

## **The Siam Cement Public Company Limited**

### **Anti-corruption Policy**

SCG conducts its business with fairness based on a philosophy that the Company shall demonstrate a keen sense to social responsibility and the best interests of its stakeholders in alignment with the principle of Corporate Governance, SCG code of conduct, and Stakeholders' Guidelines. In 2012, SCG participated "Collective Action Coalition in Anti-corruption Policy enacted by Thai Private Sector" in order to corroborate the Company's standpoint and emphasize on every Anti-corruption case.

To ensure that SCG has a proper policy determining responsibility, guideline, and regulation as a tool to prevent corruption from all business transactions, SCG has arranged a written guideline called 'Anti-corruption Policy' in order to prudently make a decision on any course of action that could possibly lead to corruption and to serve as an apparent guideline in performing business and effectively developing to sustainability organization.

### **Anti-corruption Definition**

Corruption means any types of bribery; an offering, giving, promising or agreeing to give, demanding or accepting money, assets, or other inappropriate benefits from the government officers, government sectors, private sectors, or responsible person either in direct or indirect action so that such person could proceed or disregard his/her function in order to acquire, retain the business, recommend specific company to the entity, or achieve any improper benefits in business transaction. Exception shall be applied in case of laws, regulation, statement, standard, custom, or business traditions enable to do so.

### **Anti-corruption Policy**

Director, Management Team, and SCG staff are prohibited from operating or accepting every type of corruption both in direct or indirect manner covering every business and related department in every country. The Anti-corruption Policy is needed to be reviewed regularly, including with a possible revision of such policy and implementation provision in order to accord with business changes, regulation, standard, and laws.

### **Roles and Responsibilities**

1. The Board of Directors is responsible for determining the policy, monitoring, and forming an effective system supporting Anti-corruption act in order to affirm that the Management Team intensively concerns, emphasizes, and cultivates Anti-corruption mindset as the company's culture.
2. The Audit Committee is responsible for revision of financial and accounting reports, internal control, internal audit function, and risk management so that such operations are concise, appropriate, effective, and conformed to global standard.
3. Presidents, SCG Top Executives, and the Management are responsible for determining Anti-corruption system, promoting, and encouraging Anti-corruption manner conveyed to all staff and related parties. This also includes reconsideration on system or regulation in order to best adjust with business changes, regulation, standard, and laws.
4. Internal Audit Director is responsible for auditing, assessment, and evaluations in business transactions whether they are accurate and complied with guidelines, Approval Authority, standard, laws, and policy in such monitored department in order to assure that the internal controls are sufficient and suitable for probable risk in corruption. This shall be directly reported to the Audit Committee.

### **Anti-corruption Guidelines**

1. The Board of Directors, the Management Team, and SCG staff in every level must follow with Anti-corruption Policy and the SCG Code of Conduct by avoiding involving with any course of corruption in direct or indirect manner.
2. SCG staff shall not be negligent in any corruption conditions involved directly with SCG. All staff must notify such act to supervisors or responsible person, including collaborate with investigation. Any queries or questions are needed to be consulted by the supervisor or a responsible person who monitors the SCG Code of Conduct compliance provided in particular channels.
3. SCG shall provide fairness and safeguard staff who denies or informs corruption cases relating to SCG by applying Protection Policy for appellant or persons who incorporate with Anti-corruption information as stated in the Whistleblower Policy.
4. A person who commits the corruption is equivalent to misconduct in the SCG Code of Conduct. This means such person is needed to consider discipline followed by SCG standard. Conviction on laws may be applied in case such act violates the laws.
5. SCG concerns the importance of dissemination, knowledge sharing, and communications with other people who involve or affect SCG so that those parties shall conform effectively to the Anti-corruption guideline.

6. SCG strives to create and sustain organization's culture representing that corruption is unacceptable in every business transaction dealing with both public and private sectors.

### **Provision in Implementation**

1. This Anti-corruption Policy covers to Human Resource Management process starting from recruitment, promotion, training, evaluation, and benefits provided to staff. Every supervisor in every level must communicate to staff in order to apply in business transaction under their responsibility and to monitor such implementation to be the most effective.
2. Implementation on Anti-corruption Policy should be followed by guidelines in the SCG Code of Conduct, Corporate Governance guidelines, Stakeholders' Guidelines, standard, every SCG related operation manual, and additional guidelines which will be formulated afterward.
3. To stress the attention on processes which incur a high risk in corruption, the Board of Directors, the Management Team, and the SCG staff must conform carefully in the following course of action.
  - 3.1 Gifts, Hospitality and Expenses  
Giving or accepting gifts, entertainment and hospitality activities must be complied with the SCG Code of Conduct.
  - 3.2 Charitable Contribution or Aid  
Granting contribution or receiving the aid must be transparent and in accordance with stipulated laws by confirming that such transaction shall not be claimed as a bribery act.
  - 3.3 Business Relation and Procurement Process with the Public Sector  
All types of bribery or illegal payments are prohibited in all business transactions, SCG operation, and connection to the government. Such implementation must be proceeded transparently and in alignment with related laws and regulations.

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Approved by SCG Board of Directors

on 29 May, 2013