

# SaleeColour

## Anti-Corruption Policy

Salee Colour Public Company Limited

---

## **Anti-Corruption Policy**

Salee Colour Public Company Limited has promoted anti-corruption acts among personnel in the organization according to the fact that the Board realizes the importance of reducing corruption. Overall content has been written in the Company's business ethics since the start of its proposal. Anti-corruption policy according to this announcement aims to declare the Company's intention to prevent all kinds of corruption and educate all employees to understand the anti-corruption acts under the same policy. Other related persons are also included to acknowledge the Company's intention on preventing such acts.

## **Anti-Corruption Policy**

The board of directors, management team, and staff are prohibited from undertaking any action that involve corruption whether making direct or indirect benefits for whoever covering family, friends, and other acquaintances. Corruption also means any types of bribery; an offering, giving, promising or agreeing to give money, assets, or other inappropriate benefits to the government or private sectors involved with business operations or other contacts. Everyone is required to comply with the anti-corruption policy strictly.

## **Roles and Responsibilities**

1. The board of directors is responsible for considering and approving the policy and supporting the Company's anti-corruption act in order to affirm that everyone in the Company intensively understands and are concerned about the problems arising from corruption. Furthermore, in a case where the audit committees report corrupt acts that affect the Company, the board of directors are responsible for giving advice and recommendations for punishment and working together to find solutions for the president.

### 2. Roles and responsibilities of the audit committees

2.1. To consider the anti-corruption policy raised by managing director and revise to ensure that the policy fits into the Company's business environment and culture before presenting the final policy set to the board of directors for their final approval.

2.2. To assess any changes in the anti-corruption policy offered by managing director and the Company secretary and do the presentation to the board of directors for their final approval.

2.3. To review reports on internal control systems and make risk evaluations relating to corruption according to the internal audit department's proposal. This is to ensure that these systems will minimise risks leading to corruption that will affect the Company's financial status and performance and fit into the Company's business operation patterns.

2.4. To hear and record any clues relating to corruption that internal personnel are involved with and to verify the facts being heard and to inform the board of directors for their assessment on what penalty to give or to provide other applicable solutions.

3. Roles and responsibilities of internal audit unit

3.1. To act as the internal auditing plan defines and present the board of directors a report on internal system verification and control and risk assessments related to corrupt acts caused by the internal system verification process.

3.2. To act per the audit committees' designation regarding corruption verification relating to the organization besides the internal auditing plans previously defined.

4. Roles and responsibilities of managing director

4.1. To stipulate the anti-corruption policy and present it to the audit committees

4.2. To communicate the policies to personnel and related parties in the organization

4.3. To review the anti-corruption policy to make sure it fits into new business practices or the principle of law and present it to the audit committees

4.4. To assist the audit committee in searching for more facts regarding complaints or other assignments from the audit committee relating to corruption investigations. In this regard, the president is allowed to assign work to management team that has potential to search for related facts or clues.

**Anti-Corruption Guidelines**

The board of directors, management, and employees of the Company must perform their duties in compliance with anti-corruption policy and business ethics in both direct and indirect manners as follows:

1. Refrain from any acts that indicates an intent to give or take bribes from stakeholders through the work of personnel carried out under their responsibility, either directly or indirectly in order to gain benefits. Guidelines include the following:

1.1. Do not take or give any cash gifts/ souvenirs, banknotes, stocks, gold, jewelry, properties or similar assets to related parties carried out under their coordination either in government or private sectors.

1.2. Do not take any asset or gift or other benefit that leads to refraining from performing duties. In this regard, before taking any gift, one should make sure he or she has already acted in compliance with the law and the Company's regulations. The value of given assets or gifts should not exceed the limit and should suit each occasion.

1.3. Do not give any asset or gift or benefit to influence a business partners' decision or denial to act in compliance with business codes of conduct. However, value of given assets in each occasion must not overly exceed.

1.4. Do not act as an agent to present cash, assets, items, or other benefits to business related parties, government sectors or any organization to exchange with undeserved privileges and do not act in any way to let the government officer refrain from performing his or her duties in accordance with regulations or principles of law.

2. The procurement process must be carried out in a manner that complies with the Company's regulations and adheres to transparency rules.

3. Expenses in business hospitalities and other expenses related to business commitment must be carries out in a reasonable and transparent manner.

4. Practice in donating money to a charitable organisation is as follows:

4.1. In regard to monetary donations for charitable purposes, such contributions must be made on behalf of the Company only. The donation must be given to a foundation, non-profit organization, temple, hospital or social benefit organization and performed in a transparent and lawful manner through the specified procedures of the Company.

4.2. Monetary donations for charitable purposes can be carried out in a personal manner but must not indicate any intent of corrupt acts and must not expect any benefit.

5. Spending of the Company's budget or assets must be made to support the projects on behalf of the Company only and with a purpose to support business operation, corporate image, and reputation. However, reimbursement must be declared with objectives and transparent evidence.

6. Refrain from any acts in any way that involve the internal political issues of the Company and do not use any company resources in order to perform such actions. Nevertheless, the Company is an organization that adheres to political fairness and supports adherence to law and democratic governance with no policies to support any political party in either direct or indirect manners.

7. When seeing any acts that involve or could lead to corruption that can affect the Company in both direct and indirect manners, one must not neglect to report suchacts to the President or the Company's secretary immediately or report the information through whistle-blowing channels defined in this policy.

8. Board of directors and management must be aware of the importance in communicating knowledge and advice among subordinates to give them better understanding relating to corruption and allow them to perform duties in compliance with this anti-corruption policy and act as a role model encouraging loyalty and ethical behaviour.

### **Scope of Complaint and Whistle - Blowing**

1. Acts of corruption relating to an organization in both a direct and indirect manner, such as witnessing a person giving/ taking bribery for the government/ private sector officers.

2. Violation of the Company's regulations or a person who affects the internal control system of the Company can be suspected of corrupt practices.

3. Any acts that cause the Company a loss in benefits that affect the Company's reputation.

4. Violation of laws, business morality and ethics.

---

### **Complaint-Making and Whistle-Blowing Channels**

The Board of Directors have assigned the audit committees to take action when receiving complaints or information from whistle blowers that can cause suspicion of corrupt practices in both direct and indirect manners through the channels defined in this policy. In this regard, complainants must be able to specify details of whistle blowing issues together with addresses and reachable telephone numbers and report them through the following channels:

1. Email of chairman of audit committee: [rapee60@gmail.com](mailto:rapee60@gmail.com) or
2. Email of president: [peerapun@saleecolour.com](mailto:peerapun@saleecolour.com)
3. Tel. 02-3232601-8 ext. 2005 (Human Resource Department)
4. Comment box (entrance of the canteen)

However, in case the complainants have certain issues to propose to the president or the Company's secretary, they must present those issues directly to the chairman of the audit committee. Complainants are those being affected by the company's business namely stakeholders, customers, business rivals, creditors, the government sector, the community, society, and employees. In this regard all complaints through any channels mentioned above will be disclosed by the Company.

### **Confidentiality Protection Measures**

In order to protect the rights of complainants and information providers carrying their honest intentions, the Company will disclose their addresses or any kind of personal information that can specify their identities and will keep their information strictly confidential. In this regard, only the officers in charge of complaints' verification will be allowed to access this confidential information.

However, those who receive the information relating to the complaints must keep the information on complainants and their related documents confidential. It is prohibited to disclose this information to other persons whose duties are not related, except when the disclosure must be done in compliance with the principles of law.

#### **Investigation process and penalty**

1. President, Company's secretary, and audit committees will be responsible for fact screening and the investigation process upon receiving the whistle blowing.
2. During the investigation, the president, the Company's secretary, and the audit committees may assign a representative (management) to inform complainants with progress periodically.
3. After the investigation, if the information or evidence are found to support the fact that the accused committed corrupt act, the Company will give them the right to acknowledge the accusation and prove themselves innocent by providing information or additional evidence proving they are not guilty of the accused acts of corruption.

4. If the accused truly commits corruption, this corruption is regarded a violation of the anti-corruption policies of the Company's business ethics. The accused must receive disciplinary punishment as defined by the Company. And if the corruption is illegal, the person may receive legal punishment.

However, according to the Company's disciplinary punishment regulations, the president's judgment will be regarded as final. In cases where the president is informed directly of complaints, the Company's secretary or the Audit Committees must be responsible for the information search and verification per informed in order to report to the Board of Directors asking for their consideration and to stipulate the punishment deemed appropriate.

#### **Anti-corruption Policy Disclosure**

The Company will perform the following duties in order that everyone in the organization acknowledges the anti-corruption policy:

1. The Company will set up a bulletin board containing anti-corruption policy announcements at a place where everyone in the organization is able to read it.
2. The Company will disclose the anti-corruption policy through their various communication channels, namely website, annual disclosure report (56-1) and annual report (56-2)
3. The Company will arrange training on the anti-corruption policy for newcomers.
4. The anti-corruption is reviewed on annual basis.