

Sahamirt Pressure Container Public Company Limited



Anti-Corruption Policy

(Approved from the Board of Directors' Meeting No. 5/2018 dated November 8,2018)

Policy and procedure anti-corruption

(For enclosing at the end of contract)

Anti-corruption policy

The company does not accept all kinds of corruption covering all business and items in all countries and all related units. Meanwhile, the company sets the operational steps for anti-corruption in order to comply with this policy and the company will review such operational steps regularly to correspond with the change of business law and maintain the reputation of the company, directors, management, and all staff have to adhere to this policy.

Definition under the anti-corruption policy

Corruption means the action to seek illegal benefits by duties or by legal to serve their benefits, friends and/or others by proposing, promising, requesting, demanding, giving or bribery, diverting into illegal acts directly and indirectly, making false document, taking company's assets for personal use, conflict of interest action.

Operational procedures in accordance with anti-corruption policy

1. Directors, management, and staff of the company do not accept or support all kinds of corruption directly and indirectly.
2. Directors, management, and staff do not ask, demand, and give any objects or benefits to the related persons with the company except to give or to obtain by the local tradition or trade tradition with the value not exceeding Baht 5,000, not in cash or cash equivalents, not illegal and not leading to corruption.
3. The company does not pay and obtain the fee of bribery in business operation directly or arising via persons on behalf of company, consultant, broker, contract party, partner, or intermediary under the company's control directly.
4. Procurement must be honest, legal, follows the regulation of government sector and must have price comparison from seller/service provider with transparency and fairness to all parties.
5. The company has no policy to demand or receive, offer or give financial benefit or other benefits to supplier/service provider in order to obtain the objects/service which the quality does not meet the purchase order or agreement.
6. Those who commit corruption will be punished according to the regulations defined by the company and may be punished by law if the act is illegal.
7. The company provides a mechanism for transparent and accurate financial reporting as well as provide an appropriate internal control system that is effective to prevent inappropriate action.
8. The company has channel that employees or those related persons can have access to advise on the implementation of the policy against corruption, to report misconduct or complaints by ensuring that the informer will be suitably protected as follows:

■ **Request for recommendation**

If anyone has any questions or need advice on the implementation of the policy against corruption, you can consult "Human resources manager."

1. Telephone 02-895-4139
2. Send letter to: 92, Thientalay 7 (4th Intersection), Bangkhunthien-Chaitalay Road, Samaedam, Bangkhunthien, Bangkok 10150

■ **Clue or complaint**

If anyone has a clue about corruption, legal offense code of conduct or see any system of internal control deficiencies, which could cause risk/damage to the business, you can notify clue or recommendation directly to the Chairman, Chairman of audit committee, independent director and/or audit committee as follows:

1. Send letter to: 92, Thientalay 7 (4th Intersection), Bangkhunthien-Chaitalay Road, Samaedam, Bangkhunthien, Bangkok 10150
2. Send email to the company's secretary, Email : cs@smpcplc.com

The clue or complaints must use polite words and should have detail such as name - surname of the complaining person and the person being complained, facts about the misconduct, evidence sufficient to demonstrate the wrong-doing. When the company has evidence that the whistleblower has dishonest intention: the employee will carry out an investigation to determine the punishment according to the Company's regulation. If it is a third party and the company has been damaged, the company may consider taking legal action against the whistleblower or complaint too.

The company will keep the information obtained from the whistleblower or complaint confidential and will not disclose to those who are not involved except that it is necessary at this stage of the investigation, prosecution, as witness, testifier or any cooperation to the court or government agency that is authorized by law.