



Anti-Corruption Policy

Sansiri Public Company Limited and Subsidiaries

(as amended)

Shall come into force on the 16th December 2021

Anti-Corruption Policy

Sansiri Public Company Limited is committed to conducting business with honesty, ethics, transparency, social responsibility, taking into account the interests of all stakeholders, and in accordance with the principles of good corporate governance as well as not accepting any form of corruption, both directly and indirectly. On April 10, 2017, the Company signed an intention to join the Private Sector Collective Action Coalition Against Corruption Council project, from which the Company has adopted the intention to be formulated in addition to the Corporate Governance Manual and the Company's Code of Conduct as a guideline for operations and business decisions of directors, executives and employees.

1. Definition

Corruption refers to bribery in all forms, which shall include offering, promising, giving, pledging, demanding, accepting either in monetary form, assets or other benefits that are inappropriate to government officials, government agencies, private agencies, business partners, customers, and all stakeholders, either directly or indirectly, in order to influence such person to conduct or omit any actions under their position or duty or exercise the authority under the position or duty to obtain business gains or competitive advantages or to introduce the business to a particular company or to obtain or maintain other inappropriate benefits for oneself or others or business, unless permitted to do so by laws, rules, announcements, regulations, local customs, or trade customs.

Giving of things or any other benefits refers to offering benefits in the form of money, property, goods, gifts, or other benefits as a remuneration, incentive, reward or to build a good relationship.

Giving or accepting bribes refers to offering or accepting things, gifts, prizes, or any other form of reward in order to incentivize that person to make a decision or act or refrain from taking any action or to benefit or oneself or to assist in an accomplishment of a task according to one's own will in a manner that is dishonest, illegal, or in violation of the Company's Code of Conduct.

2. Guidelines for Anti-Corruption Policy

Directors, executives, and employees of the Company are prohibited from tolerating any form of corruption, whether with government agencies, private entities, or relevant persons under duties, either directly or indirectly, in order to acquire businesses for the Company or seek personal gains unethically. These include giving or agreeing to give as well as accepting of things, gifts, receptions, solicitations, donations, and other benefits from people doing business with the company.

In this regard, the anti-corruption policy covers suppliers, customers, and all stakeholders of the Company both domestically and internationally and the Company arranges to review the operations according to the anti-corruption policy and to assess the risk of corruption throughout the organization regularly at least once a year.

3. Anti-Corruption Policies, Measures, and Practices

3.1 The Company has announced a no-gift policy during festivals such as New Year's or any other occasions in order to establish a good norm in business conduct by communicating to its directors, executives, employees, and suppliers.

3.2 The Company ensures that there is reliable financial reporting, an effective operating system and corruption risk assessment in business processes with regular monitoring to create operational transparency.

3.3 The Company places importance on disseminating, promoting and developing knowledge and understanding among individuals within the organization, especially personnel who have to perform duties with stakeholders of the Company, to build a sensible, conscious and corporate culture that does not tolerate corruption.

3.4 The Company has established channels for reporting complaints and suspicions about actions that may lead to corruption in the Company. The Company will provide protection and fairness to complainants of all cases, including employees who refuse to participate in corruption or report corruption related to the Company. The Company has set up such channels in the Whistle-Blower Channel.

3.5 The Company will regard any act, involvement, or exposure to corruption as a violation of the Company's Code of Conduct. The offender will be subject to disciplinary action set by the Company and if the act is illegal, the Company will consider taking action in accordance with the relevant laws.

3.6 Guidelines for Directors, Executives, and Employees

(1) Directors, executives, and employees of the Company must comply with the Anti-Corruption Policy and the Corporate Governance and Code of Conduct Manual and must not be involved with corruption either directly or indirectly.

(2) Directors, executives, and employees of the Company must not use the powers and duties assigned by the Company to seek personal gain or benefit for the family, relatives, or close persons either directly or indirectly throughout the business process such as acting in any way that is unfair to sell personal products or services to the Company or to compete directly or indirectly with the Company.

(3) The Company's executives and employees must not neglect or ignore when witnessing fraudulent acts that may involve the Company by notifying their supervisors or responsible persons or notifying them through the "Whistle-Blower Channel." Employees must cooperate in the investigation of various facts.

(4) The Company's executives and employees must not solicit or accept any wrongful benefits from stakeholders as stipulated in the provisions of the acceptance of things or any other benefit and the giving of things or any other benefits and must be careful and avoid accepting receptions by the Company's stakeholders who may benefit from the performance of the Company's employees or executives.

(5) Employees of the Company have a duty to clarify and request cooperation from the Company's stakeholders to comply with the no-gift policy from time to time, such as during important festivals.

(6) If employees have any doubts, hesitations or pressures to engage in corruption, they can consult with their supervisors, human resources department, or the legal office or a person designated by the Company to be responsible for monitoring compliance with the Code of Conduct at any time. Alternatively, employees can submit a complaint through the Company's "Whistle-Blower Channel." The whistle-blower or complainant will be protected fairly, and all information provided is deemed confidential.

(7) Executives and employees must cooperate in promoting good practice within the organization with the departments responsible for internal control and internal audit in providing information and monitoring results if any act of corruption is witnessed or discovered. The reporter, clarifier, or complainant will be protected fairly, and all information provided is deemed confidential.

4. Terms of action

The Anti-Corruption Policy covers all activities related to the Company's operations. Any action in accordance with the Anti-Corruption Policy shall follow the guidelines set forth in the Corporate Governance and Code of Conduct Manual and any other guidelines set by the Company to clarify the implementation of the anti-corruption policy and avoid risks that may lead to corruption. In this regard, directors, executives and employees of the Company at all levels must perform their duties with caution in the following matters:

4.1 Receiving of things or other benefits

(1) The Company requires directors, executives, and employees of the Company to refrain from receiving things or any other benefits from all stakeholders related to the Company's business operations such as accepting gifts, requesting for solicitations, requesting for a reception, or receiving donations.

(2) Employees are obliged to inform business partners and related stakeholders of the Company's no-gift policy from time to time and ask stakeholders to cooperate in doing so.

(3) In the event that there is an inevitable need to receive things or any other benefits, such as the business partner not being aware of the announcement of the no-gift policy and having already brought the item, or the employee being in the situation of not being able to refuse to receive the item for the need to maintain a good relationship between that person or organization, employees should take the following actions:

(a) Request the department manager level and above to receive items with a value of not more than 3,000 baht. If the value exceeds that amount, the Company does not permit the receipt of such things under any circumstances.

(b) Upon receipt of the item, it must be immediately delivered to the Human Resources Department for processing such item as appropriate unless the item is (1) Consumables with an expiration date within 1 month, or (2) Gifts worth not more than 500 baht, provided that the department manager has the power to consider distributing items to employees as appropriate.

(4) In the event that the Company is offered a prize, a souvenir, or any item from a contest, contract with a business partner, or an event of a commendation for the Company's work, the Company may accept it in the form of inter-organizational gift by assigning the manager level and above to be the representative to receive such items as the property of the Company.

(5) The Company allows directors, executives, and employees to receive gifts worth not more than 500 baht during traditional festivals, public relations events or various events, such as calendars, key chains, pens, notebooks, or commemorative coins with a logo of the organization or that event, where a supervisor or managerial level employee or above shall be assigned to be a representative for receiving and consider distributing souvenirs to employees as appropriate.

(6) Requests for sponsorships or items can be made in an inter-organizational manner, whereby the sponsorship process must be approved in accordance with the Company's procedures and approved by the authorized signatory only.

(7) Accepting offers for seminars, trainings, study tours or business visits at the expense of business partners can be done if it is considered appropriate and beneficial to the Company. However, factors to be cautioned of in accepting the offers are as follows:

- (a) Offers are made between individuals, not between organizations.
- (b) Offers that are not specified in the contract agreement.
- (c) Offers with the intent of tourism rather than learning.

4.2 Giving of things or other benefits

The Company stipulates that giving of things or any other benefits to stakeholders with a value of not more than 3,000 baht can be practiced during traditional festivals that are customary and are not contrary to the law, and where such practices shall be approved by managerial level employee and above to process. In addition, in order to avoid and prevent bribery acts that may lead to corruption, the Company requires the department manager level and above to check the suitability before taking action and be the representative to give things or any other benefits on behalf of the Company.

4.3 Policy for Charitable Contributions or Grants

Giving or accepting donations, solicitations, grants, items, or charitable contributions must be transparent and lawful in order to ensure that such action is not used as a pretext to give or receive bribes. In the event that the donation has a significant value, the Company will present it to the authorized director of the Company to sign for approval, whereby the appropriateness will be considered on a case-by-case basis.

4.4 Political Assistance Policy

The Company conducts business with political neutrality, does not participate in and is not interested in any political party, any politician, or any political authority and the Company shall not use any of its funds or resources to support any political party or politician or political authority, either directly or indirectly.

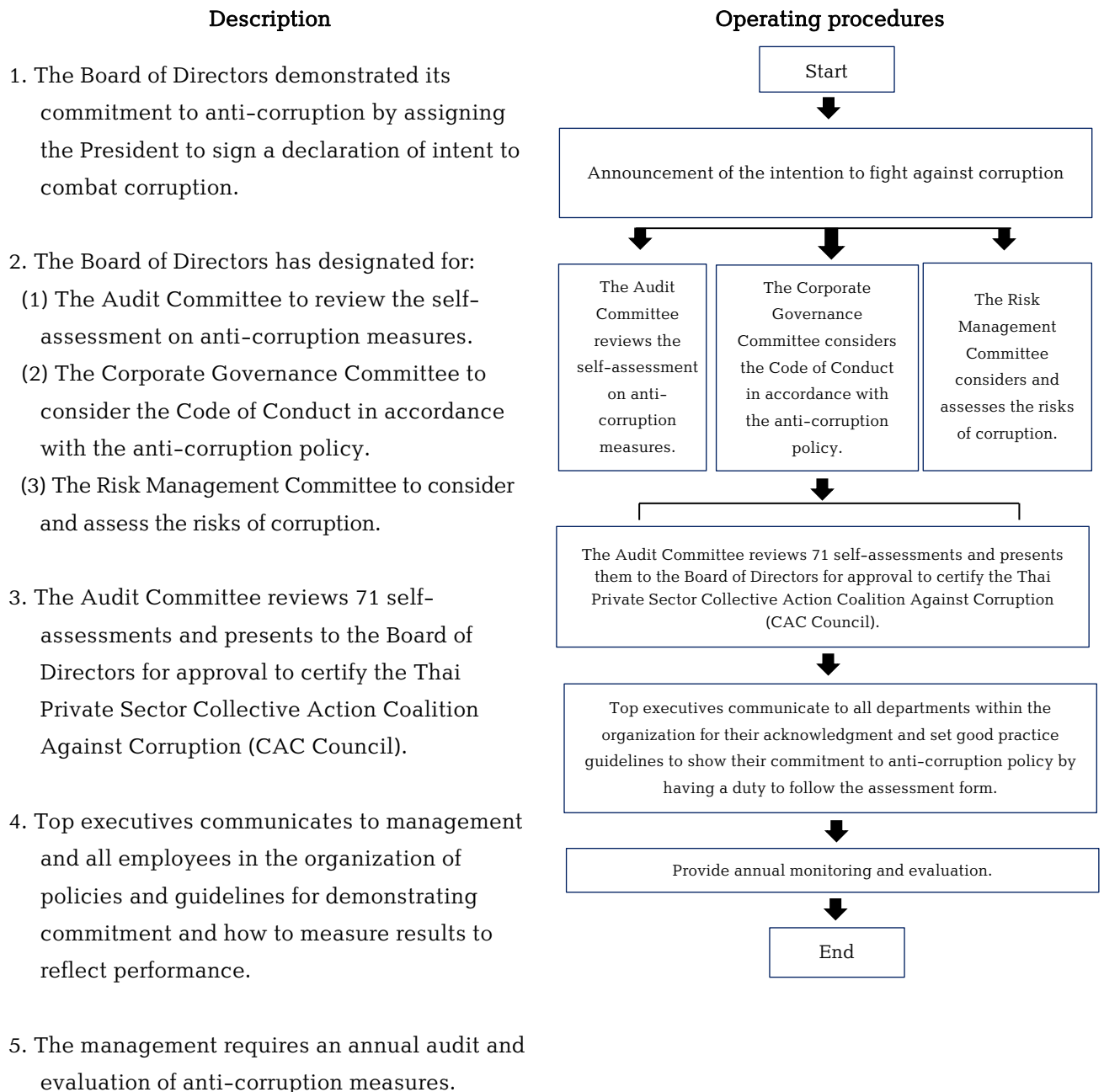
In this regard, the Company stipulates guidelines forbidding directors, executives, and employees from using their positions, duties, assets, time, or any facilities of the Company for the benefit or support of any political activity or political organization or member of a political organization. It also prohibits directors, executives, and employees from using their powers to persuade, pressure, or force colleagues and subordinates to support any political activity.

4.5 Business Relationship and Procurement

It is forbidden to give or accept bribes in any form of business operations with business partners, contract parties, or any government or private sector that conducts business with the Company and any business operations must be transparent and not contrary to legal provisions.

In addition, in supply chain management to prevent corruption with suppliers, the Company will clarify and encourage suppliers to operate in accordance with the principles and practices of the Sansiri Supplier Code of Conduct.

5. Responsibilities and procedures in accordance with the Anti-Corruption Policy



6. Whistle-Blower Channel

The Company provides channels for complaints or whistle-blowing or expressing opinions so that employees and stakeholders of all parties can file complaints or report clues or express their opinions in order to lead to personnel development and management improvement including further investigation of the facts through the following channels.

- **E-mail** CG@sansiri.com
- **Post** Address the envelope to one of the persons accepting the report as follows:
 - Chairman of the Corporate Governance Committee (Independent Director)
 - Chairman of the Audit Committee (Independent Director)
 - Company Secretary (Office of Company Secretary/Legal Office)

By sending it to the company's head office location.

- Sansiri Public Company Limited
No. 59 Soi Rim Khlong Phra Khanong, Phra Khanong Nuea Sub-district,
Vadhana District, Bangkok 10110

- **Website** <https://www.sansiri.com/eng/corporate-governance>

7. Protection and confidentiality of the complainant or related person

The Company provides for the protection of whistle-blowers, complainants, informants, witnesses, or other persons involved in the complaint, whose rights will be protected by the Company. The Company will protect and maintain the confidentiality of all information and documentary evidence that can identify the whistle-blower, the complainant, the informant, the witness, or the person involved.

The Company will not consider demolishing, penalizing, or acting in any way that has a negative effect on employees who refuse corruption in any way, even if such actions may cause the Company to lose business opportunities.

8. Disciplinary action

Any directors, executives, and employees who violate, neglect, omit, or intentionally fail to comply will be considered in violation and will be considered for disciplinary actions. The Company will consider penalties in accordance with the Company's regulations and if the act is against the law, the Company will consider taking further action in accordance with the relevant law.