

STP & I Public Company Limited

Anti – Bribery and Anti – Corruption Policy

(This policy has been approved at the Board of Directors' Meeting No. 3/2023 on 10th March 2023)

1. Introduction

STP & I Public Company Limited commits to operate with fair, transparent, and abide by related laws, regulations, notifications, ruling and requirements relevant to business operation, as well as strictly placed priority to all stakeholders. The company has stipulated the Anti-Bribery and Anti-Corruption Policy with regard to direct the company's board of directors, management, employees, subsidiary or other companies which are under our supervision. Additionally, the company has informed the Anti-Bribery and Anti-Corruption Policy to stakeholder in order to assure the understanding.

Anti-Bribery and Anti-Corruption Policy

The company's board of directors, management, employees, subsidiary or other companies which are under our supervision, must strictly adhere to the Anti-Bribery and Anti-Corruption Policy in order to ensure that they will accomplish their duties with integrity and refrain from direct and indirect bribery or corruption of all sorts. The company has emphasized the policy across all areas of the company's operation, as well as to comply with the applicable laws, regulations, notifications, ruling and requirements relevant to business operation. In this regard, the company will not penalize those who refuse to take bribery or corruption although such action would cause the company to lose business opportunity.

2. Definition

The company has declared the definitions that explain the Anti-Bribery and Anti-Corruption Policy as follows;

Dishonesty : To do an act in order to procure, for himself/herself or the other person or the company, any advantage to which he/she is not entitled by law.

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- Corruption : The exercise of power in office or in the course official duty with a view to acquiring undue benefit for his/her own or for other persons or for the company.
- Gifts : Money or object which is transferable to money (such as gift card, voucher, cashier's check, etc.) or stuff or privilege (such as discount, premium, etc.) being handed between the company and those dealing with the company by courtesy, tradition or as a desirable social manner, such as gift, hamper, flower basket, calendar, stationery, sampling product, souvenir, etc.
- Charitable Contributions and Sponsorship : The giving of money or object or any other benefit to serve the charitable purpose for the government, corporation, or persons to support society, religion, and education as well as public relations and enhancing the image such as a donation of money or objects to victims of a natural disaster, donating money to foundations, food donations to underprivileged students, or supporting cultural activities, arts, education, and community health, etc.
- Political Contributions : Contributions made in money or other forms of assistance with the aims to support political activities. Financial contribution also covers the giving of loans and other forms of assistance such as the giving of objects or services, an advertisement aiming to promote or support a political party, the purchase of tickets to specific event held to found or collect donation for an organization that is close to a political party. Moreover, letting employees leave the job without paying a salary or allowing employees to represent the company in the participation of

political campaign are included in the terms of political contributions.

Conflict of Interest : Any action of stakeholders of the company that causes a conflict of personal interests and affects making a decision or being unable to professional duties objectively has the effect on the company to lose benefits or receive fewer benefits than it should.

Facilitation Payment : It is a payment made to a government official that acts as an incentive for the official to complete some actions or processes expeditiously such as applying for a license, requesting a certificate, etc.

Revolving Door : The hiring of government employees or commanding company employees to work in government organizations that may create a conflict of interest is prohibited.

3. Procedures

The Company has determined practices which relate to high risk issues that could lead to misconduct, corruption and bribery with respect to encourage the directors, executives and employees, as well as subsidiary or other companies under our supervision to operate with utmost caution.

3.1 Gifts

The company operate with fair, transparent, and abide by related laws, regulations, notifications, ruling and requirements relevant to business operation as bidding of works or projects both public and private sector, procurement liaison or activities related to the business operations of the company Therefore, the company is aware of accepting or giving gifts that may cause fraud and corruption risks, to avoid that the company has

established a policy on receiving or giving gifts, or any other benefits in writing for a practical guideline for all parties involved.

3.2 Charitable Contributions and Sponsorship

Offering charitable contributions and sponsorship to any organization must strictly do with transparent that did not contrary to the morality, code of conduct, and abide by laws and regulations of the company. The offering sponsorships or charitable contributions as the foresaid can be done after the approval by authorized person.

The offering charitable contributions, including sponsorships, to public or private sectors must not be used as a subterfuge or route for conflict of interest in both individual and company's benefits and must not be used as a subterfuge for bribery and corruption.

The approvals of offering charitable contributions to public or private sectors must strictly adhere to the regulations by writing the report attached with the offering sponsorships or charitable contributions payment for approvals and submit all related papers to the Management for considering process.

3.3 Political Contributions

The company is a politically neutral organization and does not support any political parties or politicians including enabling the Board of Directors, Management and employees not to participate in any act under the name of the company.

The company realizes that it is righteous of its people according to the liberty and rights in participating the political activities therefore, the company encourages its people to exercise their political rights in compliance with laws but prohibit using employees' status or using any company's assets as a subterfuge or route for any form to political participation or political contributions in the name of the company.

To express and giving political opinion in the company's office or job site area is penalty to the company's association.

3.4 Conflict of Interest

Prevention of conflicts of interest is the duty and responsibility of all managers, staffs, and employees who must understand, adhere and do it right by guidelines or measures as follows:

- Management and operation by adhering to morals and ethics by adhering to the principles of good governance and guidelines set by the company.
- Fully dedicate oneself and time to the Company in case it is necessary to do other work to increase income or for other purposes outside working hours, such work must not violate or be against the law and good morals, not affecting work in their responsibilities, not doing business that is contrary to the interests of the company or is it a competition or has the same characteristics as the Company.
- Do not use the secrets of the company to seek benefits both directly and indirectly.

3.5 Facilitation Payment

The Company has no policy to pay facilitation payments in any form both directly and indirectly without taking any action and does not accept any action related to facilitating the operations of the Company

3.6 Revolving Door

The company has no policy to hire government employees that is still in a position to avoid any conflict of interest.

3.7 Whistleblowing for Bribery and Corruption

The company supports its personnel to report any misconduct or non-compliance or any form of action that might result bribery and corruption by sending their enquiries to managers or other channel that open for this matter. The company has whistleblowing

and whistleblower protection policy as stated in the good governance chapter. The additional complaints channel for whistleblowing as follows;

1. Chairman of the Audit Committee or
2. Independent Director or
3. Corporate Secretary

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Whistleblowing, complaints, and suggestions will be taken into consideration or implementation appropriately on a case by case basis. The whistleblowing procedure and whistleblower protection policy are stated in Corporate Governance Policy Section 4 Disclosure and Transparency, Topic of Whistleblowing and Whistleblower Protection Measures

3.8 Human Resource Management

The Company has policies and measures against fraud and corruption. It covers personnel management processes, including recruitment, selection, promotion, training, and performance appraisal of employees with transparency including having measures not to demote, punish or harm employees who reject corruption. Even if doing so would make the Company lose a business opportunity.

3.9 Evaluation for Risk from Bribery and Corruption

The Internal Audit of the company has responsible for doing the evaluation of risk from countering bribery and corruption by evaluate, analyze, and risk management that might result bribery and corruption to be acceptable and report the evaluation result to the

Audit Committee including follow up the procedures to prevent risk from countering bribery and corruption and with the Anti-Bribery and Anti-Corruption Policy.

3.10 Countering Bribery and Corruption Awareness

The company communicates and organizes internal training for employees so that employees understand and realize the importance and strictly complying with the Anti-Bribery and Anti-Corruption Policy since the orientation started entering a new job and publicizing through various channels such as notifying employees via email, posting announcements on the website and bulletin boards at the offices and all workplaces of the company, etc.

All directors and executives must be good role models and encourage subordinates at all levels to adhere to the Anti-Bribery and Anti-Corruption policy continuously and make it part of the corporate culture.

Moreover, the company also communicates and drives subsidiaries, affiliates, business partners, and contract parties to acknowledge and comply with the policy and this guideline not to act or be involved in bribery and corruption

3.11 Punishment

The punishment is compliance with the company's regulations and/or related laws.