
Anti-Corruption Policy

SVI Public Company Limited

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Anti-Corruption Initiatives

SVI Public Company Limited is determined to operate the business with integrity, with a focus on social responsibilities, meeting its obligations to all stakeholders, and adhering to the principles of good corporate governance and a code of business conduct. The company designed policies and regulations to eradicate corruption and dishonest practices.

To ensure that all employees comprehend the business practices, operating policies, and procedures aimed at preventing corruption in all business activities, it is crucial to ensure that they are aware of their appropriate responsibilities. The company has properly documented “anti-corruption policies,” which serve as clear guidelines for business operations.

Definition of Corruption

Corruption refers to engaging in any form of bribery, which includes offering, receiving, committing, or inducing someone into illegal acts; making promises; and requesting and receiving money, properties, or any other interests deemed inappropriate from government officials, public and private sector organizations, and any duty bearers, either directly or indirectly. This is done to enable an individual to carry out an act or refrain from performing their righteous duties, with the aim of acquiring or maintaining a business, referring specific business opportunities to the company, or obtaining or maintaining other business-related benefits deemed inappropriate. The only exception to this is where the rules of law, regulations, notices, principles, local customs, and commercial practice would allow such conduct.

1. Anti-Corruption Policy

The company believes that corruption is illegal and undermines the reputation of its business operations. Therefore, the company has formulated policies to combat all forms of corruption. Whether directly or indirectly, cover all business and transactions related to the company to avoid causing harm to the company. They emphasize good corporate governance within a management framework of good ethics, transparency, and accountability. In particular, the company has developed anti-corruption policies below.

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- The company prohibits directors, executives, and employees from requesting or receiving benefits or assets that could trigger action, or from neglecting their own responsibilities in a manner that could result in the company losing those benefits.
 - The company directors, executives, and company employees are prohibited from providing or offering any benefits or assets to third parties in order to persuade them to take action or avoid any illegal or unlawful behaviour.
 - If there is a fraudulent action, the company will consider taking action against that person in strict accordance with the company's regulations or the law.

2. Duties and Responsibilities

- 2.1 The board of directors has the responsibility and obligation to formulate policies, supervise and support an effective anti-corruption system, and ensure that the management recognizes and cultivates it as a corporate culture.
- 2.2 The audit committee is responsible for reviewing financial and accounting reporting systems, internal control systems, internal audit systems, and risk management systems to ensure compliance with international standards.
- 2.3 The CEO has the obligation and responsibility to establish a system and ensure the promotion and support of anti-corruption policies so as to communicate with relevant staff, including reviewing the applicability of the system and the measures taken to comply with business regulations, rules, and legal requirements.
- 2.4 The audit manager is responsible for carrying out duties and responsibilities related to inspection and review. The audit manager correctly carries out the work in accordance with policies, guidelines, authority, regulations, laws, and regulatory agency requirements, ensuring a control system that is appropriate and adequate for potential corruption risks, and reports this to the Audit Committee.
- 2.5 Directors, executives, and employees at all levels of the company must strictly comply with anti-corruption policies. Failure to comply with this policy will result in disciplinary action.

3. Guidelines for Anti-Corruption

- 3.1 Directors, executives, and employees of the company at all levels must abide by the anti-corruption policy and the company's code of conduct. strictly. They must not be involved in corruption, either directly or indirectly.
- 3.2 Directors, executives, and company employees shall not neglect or disregard any corrupt company behaviour. You must notify the supervisor or person in charge and cooperate with the investigation. If you have any questions or concerns, please consult the supervisor or designated person responsible for follow-up, and adhere to the company's code of conduct through designated channels.
- 3.3 The company takes protective measures against complainants, ensuring fairness and protection for employees who deny or report company-related corruption or individuals who cooperate in reporting fraud as specified in the company's Corporate Governance Handbook.
- 3.4 Directors, executives, and employees who commit corruption are considered violations of the company's ethics. According to the company's regulations, this must be considered disciplinary action.
- 3.5 The company acknowledges the significance of disseminating, instructing, and comprehending the principles outlined in this anti-corruption policy to individuals who carry out their responsibilities within the company or could potentially influence it.
- 3.6 Directors, executives, and employees of the company shall not demand, implement, or accept any form of corruption for their own interests. For the benefit of oneself, family, friends, and acquaintances.

4. Guidelines for Giving or receiving gifts, Sponsorship and Hospitality services

Giving or receiving gifts refers to giving or receiving property or any other benefits to establish a good relationship, whether it is money, goods, services, gift vouchers, etc.

Sponsorship means providing food and drinks, performing, watching sports, participating in sports activities such as playing golf, recreational activities, etc.

Hospitality service means welcoming and providing assistance to visitors in a friendly manner, while paying attention.

The Company follows the policy that prohibits it from giving or accepting gifts in any form or in cash to individuals who do business with the Company and its subsidiaries, unless such actions meet the reasonable standards of maintaining good relations with business contacts. Additionally, the Company does not want to accept any specific services or remuneration that do not comply with the code of business conduct.

Giving or accepting gifts and sponsorship shall meet the following criteria:

- Must be in accordance with the traditions and customs that exist.
- Must be approximate, infrequent, and suitable for the occasion.
- Must not violate laws, regulations, and comply with good corporate governance and company policy in related matters.
- Directors, executives, and employees shall not receive any financial or personal benefits from clients, business partners, or anyone else who represents the company. If the value surpasses 2,000 Thai baht, the supervisor must report it, unless they cannot refuse, and send a gift as a reward or voluntary donation.
- Directors, executives, and employees are prohibited from lending, borrowing, or soliciting money. The company does not accept items from customers or individuals conducting business with it, unless they borrow money from a bank or financial institution on behalf of a customer.
- Our company does not have any financing policies, incentives, or offers preferential treatment to customers, our partners, external institutions, or any individuals in any form, except for providing traditional commercial sponsorship, commercial discounts, and our promotion plans.

5. Donation

5.1 Definition

Donation refers to providing or receiving money, goods, or any other benefits to government agencies, private sectors, or foundations without asking anything in return.

5.2 Objectives

The company has established policies and criteria regarding charitable donations to encourage and develop underprivileged youth to have an educational basis that is appropriate to their abilities and intelligence, to create careers that are appropriate for their locality, and to operate for the public benefit without expecting any benefits in return. The company has established the following policies and criteria for charitable donations, as well as for the investigation and control processes:

- 5.2.1 Proof is required to verify the actual activities taking place and that the desired objectives of the campaigns have been successfully achieved and benefit has been provided for the betterment of society.
- 5.2.2 Proof is required to verify that such charitable donations have nothing to do with any reciprocal benefits to any specific persons, organizations, or groups.

5.3 Guidelines

- 5.3.1 The company shall make donations with caution upon request, advice, or recommendation from government officials or business partners, because paying donations to such organizations may be seen as indirect bribery to obtain or maintain commercial contracts. Decisions related to government licensing, taxation, customs, or commercial interests are crucial.
- 5.3.2 The company has developed a plan to determine goals, donation amounts, and organization through the responsible person before submitting approval to management.

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- 5.3.3 Donations must be approved by the company's senior management, abide by the Code of Conduct against Corruption, and receive clear and accurate receipts every time.

The main purpose of donations is to promote and develop disadvantaged young people, provide them with an educational foundation that is suitable for their abilities and intelligence, provide them with jobs that are suitable for the local area, and reward them in the public interest.

6. Sponsorship Guidelines

Sponsorship is the act of paying or receiving funds from customers, partners, or business partners in exchange for commercial gain. The company's brand or reputation is at risk due to the payment of services or benefits that are difficult to measure and track. Sponsorship could be linked to corruption. Therefore, the company has established sponsorship policies and rules for workmanship.

- 6.1 The applicant for financial support must demonstrate that they have actually carried out activities in line with the project, that these activities support the project's objectives, and that they genuinely benefit society, not just the group or any individual.
- 6.2 It must be proved that any monetary grant or other benefits, such as accommodation, etc., have nothing to do with the reciprocal benefits paid to any individual or entity, except those declared according to ordinary business practices.
- 6.3 The company shall provide funds with caution when requested, advised, or recommended by government officials or business partners. This is due to the potential perception that providing sponsorships to these organizations could be interpreted as indirect bribery aimed at securing or retaining commercial contracts, as well as decisions related to government licensing, taxation, customs interests, or other commercial interests.
- 6.4 The company has developed a plan to determine goals, donation amounts, and desired organizations with the responsible person before submitting it to management for approval.

6.5 Financial support must be approved by senior management of the company and comply with the guidelines for anti-corruption measures of various charitable organizations. Tax Bureau or Ministry of Finance.

7. Political Contributions Policy

Political contributions encompass the provision of financial support, goods, and/or participation in activities, as well as the encouragement of employees to engage in political activities on behalf of the company, with the aim of obtaining commercial benefits. Employees may participate in activities in accordance with their personal freedom rights, but they cannot secretly claim their identity or take away the company's property, equipment, and tools for any political action.

The company has a clear policy that does not encourage any political party, party officials, candidates, organizations, or individuals to participate in political activities. The company refrains from supporting political parties, party officials, candidates, organizations, or individuals, either directly or indirectly, unless it aligns with the relevant laws.

7.1 The company prohibits employees from using company assets to support politics, political parties, or power groups. Employees cannot receive direct or indirect privileges or undue benefits in exchange.

7.2 According to the Constitution and other democratic laws, employees have the right and freedom to participate in political activities as citizens. Employees utilize their personal resources and time to engage in political activities.

7.3 Directors, executives, and employees are not allowed to participate in any activities, nor are they allowed to express any opinions that may lead to the understanding that the company is involved in or supported by any political party, political party, or power group, or any opinions that may lead to disharmony and reconciliation within the company and the country.

8. Facilitation Payment

A facilitating payment, facilitation payment, or grease payment refers to a payment to government employees to speed up an administrative process, such as when applying for licenses, certificates, and public services.

The company has no policy of paying convenience fees directly or indirectly in any form, and it does not take or accept any action in exchange for convenient business.

9. Revolving Door

The company does not have a policy of hiring government employees as employees, as this may lead to conflicts of interest, and it does not comply with the company's rules and regulations.

10. Corruption Report

All employees must notify their supervisors or responsible persons when any corrupt behaviour related to the company is discovered and cooperate with the investigation. If there are any questions or concerns, please consult the supervisor or the designated person responsible for follow-up. Ensure compliance with the SVI Code of Conduct through designated channels.

The company guarantees all employees protection from retaliation and rewards for honest reporting, communication, and information disclosure.

The company conveyed information related to anti-corruption measures to various stakeholders through the following channels: new employee training, SVI news, public relations committee, annual report, and other appropriate methods.

The company discloses information to stakeholders through annual reports and annual registration statements (56-1, company website or other appropriate means to ensure that it has transparent anti-corruption measures, and it will review its anti-fraud and corruption policy regularly every year to ensure compliance with criteria, laws, and various guidelines.

11. Complaint / Reporting Channels

The company has established channels for complaints, reporting illegal behaviour, or violations of anti-corruption policies. The organization's personnel, including employees, executives, and stakeholders, may engage in behaviour that could potentially lead to corruption or improper behaviour and establish channels for consultation, advice, or inquiry regarding the implementation of anti-corruption policies.

If personnel have any questions or need advice on complying with anti-corruption policies, they can directly approach the supervisor or use the company's designated reporting or complaint channels.

11.1 Purpose

In order to encourage management and employees to conduct business in a correct, transparent, fair, and auditable manner in accordance with good corporate governance principles and the corporate code of conduct, the company expects everyone to honestly report any violations or suspected violations. The company is committed to providing regulatory authorities with accurate, fair, transparent, and just information provider protection, while adhering to the security laws and stock exchange of Thailand, a principle it has also adopted.

11.2 Scope of filing complaints and notification of clues

If there are uncertainties or suspicious actions that violate the Code of Good Conduct, such as disregarding the principles and guidelines of good governance policies, anti-corruption policies, breaking company rules and regulations, and subjecting employees to unfair treatment in the workplace.

11.3 Reporting or complaint channels can be reported through the following two channels:

- Internal auditor (audit_committee@svi.co.th)
- The human resources department (suggestion box) sends it through electronic systems, email, or other appropriate and secure channels.

11.4 Conditions and considerations for clues or complaints

The detailed information on clues or complaints must be true, clear, or sufficient for investigation. The information received will be confidential and will not disclose the whistleblower's name. Individuals who report or complain without public consent, regardless of their employment status, will receive protection. Third parties, complaint recipients, and those involved in the investigation process must keep the relevant information confidential when investigating the facts. For safety reasons, we will disclose it when necessary.

11.5 Process

11.5.1 After receiving the complaint, we maintain a level of confidentiality based on the nature of the case and send it to the supervisor for investigation. The Human Resources Department receives a preliminary copy of the matter to formulate suggestions for disciplinary action or other actions. Finally, a copy of the case will be sent to the management and audit committee for a final decision.

11.5.2 Gather information, direct the complaint department to conduct an investigation, and recommend appropriate actions or practices for the relevant personnel. If disciplinary action is necessary, consult the human resources department to ensure it aligns with the company's regulations. Submit the facts, implementation results, and disciplinary orders (if applicable) to the management and the audit committee for the relevant authorities' understanding or consideration.

11.5.3 If a complaint comes from an anonymous person and the complaint handler is unable to find sufficient additional information, they will send a report of the investigation's results, including information and opinions, to management through the relevant supervisory authority in accordance with the steps to request the appropriate course of action.

If it is determined that the complaint cannot be processed, it will be closed. The complaint handler will then send a copy to the complaint coordinator for further reporting to management and the Audit Committee. If the complaint handler examines the facts and determines that the complainant is not at fault, that a

misunderstanding caused the matter, or that they have advised the complainant or those involved of appropriate conduct, they should close the matter without any punishment. The complaint handler must present the matter to the superior for approval before closing it. The complaint handler must also forward a copy of the matter to the complaint's coordinator for the complainant's information and report to both the management and the Audit Committee.

11.5.4 If the complainant and the human resources department believe that disciplinary action is necessary, an investigation will be conducted. The management will receive reports for confirmation and guidance in adhering to company regulations.

11.5.5 Report the summary results to the complainant, improve the complaint handler's performance in accordance with management's orders, provide recommendations for appropriate further action, report the results of the operation to the complainant, and record the results of actions taken regarding the issue. The complainant provides the committee with the necessary details.

If reporting, complaining, providing statements, or providing any information is proven not true, then the complaint channel is either dishonest or incorrect. If the individual in question is a company employee, they will be subjected to disciplinary action. If a third party engages in such behaviour, the company will also consider suing the person.

11.6 Measures to protect whistleblowers or complainants

11.6.1 The company will keep confidential the information and identities of the whistleblower, complainant, and respondent. When necessary, the company will disclose information, taking into account the safety and damage to the informant or related personnel, and will implement appropriate and fair procedures to mitigate the damage.

11.6.2 The company provides protection for employees who refuse or report corruption related to the company. The company's policy is not to demote or have a negative impact on rejected employees, report corruption related to the company, even if such behaviour may lead to business losses, and clearly communicate this policy with all employees. Notify via public relations committees, brochures, websites, annual reports, or other appropriate methods, including insertion during annual events. Employee training, etc. All departments of the company must strictly comply with this policy.

12. Communication

The company disseminates a variety of information about anti-corruption measures to various stakeholders, including employees, management, subsidiaries, shareholders, customers, partners, and other business-related individuals. This information is disseminated through monthly management meetings, bulletin boards, website flyers, annual reports, and other appropriate channels, such as interference with annual activities and employee training.

13. Information Disclosure

The company discloses information to employees, executives, shareholders, clients, partners, all stakeholders, and related parties through annual reports. You can check the annual report on the company's website or use other suitable methods to guarantee transparency in the company's and its subsidiaries' operations.

14. Data Storage and Preservation

The company conducts information-related work in accordance with policies, with the goal of maintaining standards for work systems and computer systems. The data communication system is an

important foundation for establishing an effective control system that will perform a variety of tasks for the group's business. To fulfil the aforementioned commitments, devise diverse control measures with varying forms and costs, taking into account the suitability of information, work processes, and computer systems. The following standards and regulations should be implemented:

- 14.1 Determine the responsibilities of users and data custodians of the entire system and all computer systems.
- 14.2 Assess risks and create a risk control system suitable for the changing environment.
- 14.3 Establish a data protection system, a work system, a computer system, and appropriate personnel.
- 14.4 Create a data protection system to prevent data entry, editing, and illegal data operations, regardless of whether they happen accidentally or intentionally.

15. Audit Process and Internal Control

Every year, the company collaborates with the internal audit department to arrange internal audit procedures. The company provides independent and unrestricted operations for internal auditors. In addition, according to the regulations of the Securities and Exchange Commission, certified public accountants conduct audits quarterly and annually.

The Audit Committee is in charge of implementing control measures to guarantee that the business operates within a suitable scope, adhering to the relevant policies and laws. The Audit Committee monitors and verifies whether employees have complied with relevant policies or procedures and have always complied with the requirements stipulated by laws and regulations.

16. Tracking and Reviewing

The company requires all relevant parties to regularly monitor and review policies and practices according to their responsibility structure and be responsible for monitoring and reviewing performance.

Report any suspected violation of this policy, laws, or regulations through reporting or complaint channels to the Managing Director or relevant personnel.

16.1 Guidelines for general notification to those involved

- 16.1.1 The company's website contains public relations information.
- 16.1.2 Production of brochures or announcements
- 16.1.3 Manage public relations using the company's network, which includes email, journals, and public relations.
- 16.1.4 Create any media, items, or symbols representing anti-corruption policies.
- 16.1.5 Organize joint activities or publicity activities among employees, managers, subsidiaries, customers, partners, other stakeholders or the public, with the purpose of promoting the policy of supporting anti-corruption.

16.2 Notifying customers and partners

- 16.2.1 Provide information about anti-corruption measures in the commercial contract between the company and the parties or customers as a condition for informing customers. For instance, upon the commencement of business between the parties or customers, neither the "tenant" nor the employee or agent of the tenant may request or accept any money or property in the car rental service contract. This allows the employee or agent to decide whether to conclude a commercial contract or rent a car with the tenant in accordance with the terms of the contract. If any party engages in such behaviour, they must promptly notify the other party in writing, and both parties retain the right to terminate the commercial contract or car rental contract without having to pay rent.
- 16.2.2 Print a statement outlining our company's policy program against all forms of corruption, and encourage all parties to adopt the same approach. Include this statement on all business documents, such as the order receipt. "Our company has a policy of opposing and not tolerating all forms of corruption, and we encourage all parties to take the same approach and work together to build a clean society."

16.2.3 Provide any symbols or media to indicate the anti-corruption policies and guidelines on the articles for customers or partners to use, for example, during various festivals, commercial occasions, or in promoting the company's sales.

16.2.4 Prepare letters or documents to inform all customers and partners about the policies regarding the receipt or giving of gifts, as well as sponsorship opportunities. During festivals or business opportunities, it is important to provide partner certification and rewards, among other things.

16.3 Communication with employees, executives, directors, and their subsidiaries

16.3.1 Publish company policies, anti-corruption measures manuals, and related documents on internal communication tools. For employees who are not on the network, the human resources department is responsible for printing and distributing information on computer equipment.

16.3.2 Post announcements on anti-corruption news and policies on the employee bulletin board, so that employees can understand various events and act in a correct way.

16.3.3 Arrange at least two meetings annually between executives and employees, and use this opportunity to communicate anti-corruption policies. This includes asking and answering practical questions, identifying problems that arise, and finding appropriate solutions.

16.3.4 The company's new employee orientation should explain its anti-corruption policy to new hires.

16.3.5 Organize communication through the company's channels, including the public relations board.

17. Guidelines for Human Resource Management

17.1 The company places a high value on personnel management factors and will carefully consider selection, training, performance evaluation, promotion, compensation, and various rewards for employees. The company will strictly consider anti-corruption measures.

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- 17.2 The company imparts knowledge on anti-corruption policies and measures to both the board of directors and employees on anti-corruption policies and measures. The company will inform employees of the policies and penalties for violations during onboarding training.
 - 17.3 The company continuously communicates and trains on anti-corruption policies and measures. To enable employees to fully understand anti-corruption policies and measures, the company continuously communicates and trains.

18. **Guidelines for Complying, Monitoring, and Evaluating Anti-Corruption Policies**

The company has established the following guidelines to monitor and evaluate the implementation of anti-corruption practices:

- 18.1 Directors, executive directors, and staff are required to regularly self-evaluate their compliance with the company's Handbook on Corporate Governance and Business Ethics, which includes corporate governance policies, business ethics, anti-corruption work involving managers and staff, a code of conduct for preventing corruption, and employee behaviour and welfare.
- 18.2 Establish an internal audit department that will inspect the internal control system, risk management, corporate governance, and provide continuous feedback by carrying out inspections in accordance with the plan. The Audit Committee will approve annual audits and report significant audit results and recommendations to the Audit Committee.
- 18.3 The Risk Management and Internal Control Department is responsible for continuously testing and evaluating fraud and corruption risks, ensuring effective implementation of anti-corruption measures, and regularly monitoring, reviewing, and improving anti-corruption measures. Submit the evaluation results to the Risk Management Committee and report to the Board of Directors in a timely and regular manner.

This policy has been updated and is effective on May 14, 2024.

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Mr. Prasert Bunsumpun
Chairman of the Board of Directors
SVI Public Company Limited