

Anti-Corruption Procedure

Subject Anti-Corruption

1. Purpose

Regulating this Procedure, the Company aims to execute a proper practice on Anti-Corruption and to comply with the Company policy.

2. Definitions

2.1 Company	means	Thai Cold Rolled Steel Sheet Public Company Limited
2.2 Director	means	A person who is appointed to be the Board of Directors
2.3 Anti-Corruption Committee	means	A person who is appointed to be Anti-Corruption Committee
2.4 Executive	means	An Employee who is the position of General Manager or higher up to Executive Vice President
2.5 Employee	means	An Employee
2.6 Corruption	means	The misuse of power by position, whether direct or indirect actions, to acquire money, properties, or any benefits for the Company, yourself or the others for example; give or receive bribe, other benefits, intimidate for benefit including, give or receive Gift, Hospitality, Sponsorship, Donation, Political Contribution, Facilitation Payment, Revolving Door or Conflict of Interest with Public Officer except allowed by law, regulation, announcement, rule, local tradition or trade norm.
2.7 Gift	means	Any objects or services for examples: money, properties, objects, services or other valuable benefits that is given or received from Public Officer or individuals for the purpose of getting into business relationship, with the Company, whether for an important occasion on the traditional, cultural, manner norms of the society or under local tradition.
2.8 Hospitality	means	Expenses on providing meals, drinks, accommodation and traveling fees for welcoming or servicing Public Officer or individual who may provide business relationship with the Company.

2.9 Sponsorship	means	Payment or money received from customer, vendor, business partner or individual for the purpose of supporting business, branding promotions or Company reputation, for the objective to build a credible business relationship occasionally.
2.10 Donation	means	Donation of money, objects or other benefits to individuals or juridical person that has the objective under public good such as charitable organizations, foundation, or fund.
2.11 Political Contribution	means	Helping in terms of property, objects or money including processing any support both direct and indirect to political party, party's officer, voting candidate, involving organization or individuals relate with politic.
2.12 Facilitating Payment	means	Unofficial payment being paid to the Public Officer in the terms of contribution in any forms whether, money or other benefits, to persuade the Public Officer on providing convenient in the process of government related activity of the Company to be the fastest and smoothest as possible.
2.13 Revolving Door	means	Public Officer who work for a private sector or private officer whose duty is involved in public policy in the term that destroy Company's credibility and the integrity of act on duty or public policy making of public organization that risk to be Corruption in a way of Conflict of Interest and non-neutral supervisor or the public organization.
2.14 Public Officer	means	Government Officer, Employee, contractor, a group or a person who work in administrative organization or being appointed an administrative power of the government to legally process something.
2.15 Conflict of Interest	means	A situation or an action that the Director, Executive and Employee is having a personal benefit that effects decision making or action on duty in position those responsible for, and effect general interest of the Company whether directly or indirectly.

3. Procedures

3.1 Duties and responsibilities

The Company is appointing the duties and responsibilities the of Board of Directors, Anti-Corruption Committee and Executive including related department for the duties and responsibilities of Anti-Corruption as follows.

- 3.1.1 The Board of Directors has a duties and responsibilities to set up the Policy of Anti-Corruption in any form both direct and indirect for all the organization to follow.
- 3.1.2 The Anti-Corruption Committee has a duties and responsibilities to govern, suggest and follow up the action following the Policy and Procedures on Anti-Corruption and following Procedures on Whistleblowing and Raising Concerns. Moreover, the Anti-Corruption Committee shall revise such Policy and Procedures to be up to date with the related international standards, rules, regulation and law.
- 3.1.3 Executive has a duties and responsibilities on setting up a proper and effective system on gathering measure must relate to the Anti-Corruption Procedures, including communicate to the Employee and stake holder to make mutual understanding and act in the same standard.
- 3.1.4 Internal Audit Office has a duties and responsibilities to inspect and review the action which is accurate following the Policy and Procedures on Anti-Corruption, Authorization, and Procedures of the Company to be sure that the Company has a proper and sufficient control system that complied with Corruption risk and report to the Anti-Corruption Committee.

3.2 Anti-Corruption

- 3.2.1 Director, Executive and Employee shall follow the Anti-Corruption Procedures by not involving in Corruption whether directly or indirectly.
- 3.2.2 The Company shall provide justice and standard protection for Employees who act against Corruption or individual cooperate following Policy and Procedures on Whistleblowing and Raising Concerns.
- 3.2.3 Executives and Employees who commit Corruption was considered as gross misconduct and shall be considered for a disciplinary punishment follows the Company regulation and/or being filed a lawsuit. For the Director who commits corruption, the Board of Directors shall consider his resignation and or filing a lawsuit.
- 3.2.4 The Company shall communicate the Anti-Corruption Policy and Procedures to the stakeholders of the Company.

3.3 Gift and Hospitality

- 3.3.1 Board of Director, Executive and Employee shall not give or receive Gift or other benefits that has a characteristic of Corruption. Except, giving or receiving Gift from traditional occasion or to preserve the good relationship between person or organization that does not affect the

business decision, benefit, bond, or create burden to be repay in Corruption. Gifts are allowed to be accepted as stated below.

- 3.3.1.1 Giving or receiving Gift shall be done in the Company's name transparently not in the personal name. Then reports to the commander immediately.
 - 3.3.1.2 Giving or receiving Gift in a proper traditional occasion without violating related law such as; An Announcement of the Office of the National Anti-Corruption Commission. Giving or receiving Gift shall not be in the form of money or the equivalent of money, for example, cheque, cash card. In addition, the Gift must not contain a value more than 3,000 baht or as specified in Code of Conduct.
 - 3.3.1.3 Not receive or accept Gift from spouse, children or a person related to Public Officer, customers, business partner, vendor and contacted person in the term of substitute receiver.
 - 3.3.1.4 The Company shall properly store and record payment evidence that shows the value of Gift the being given or received on every occasion for later inspection.
- 3.3.2 Reasonable business Hospitality and other payment related to the contractual obligation is allowed following the Authorization Manual of the Company including related Policy and Procedure. Thus, information about institutions that received Hospitality and the number of people attended shall be transparently saved for later inspection.

3.4 Sponsorship and Donation

- 3.4.1 Sponsorship and Donation in any form of property, object or money to individual, a group, judicial person, organization or public institution with the purpose for public good, public charity or legally public good or for the purpose of non-profit organizations only and shall not use as a reason to commit corruption. The process shall be transparent and inspectable under the approval of Authorization Manual of the Company and related Company's regulations or Board of Director's resolution.
- 3.4.2 Internal Audit shall inspect the information in 3.4.1 if there is any action following such Sponsorship or Donation project without an exchange interest. Except, a general praise following traditional custom for example logo attachment name announcement at the event or in the promotional media. Then report to the Anti-Corruption Committee.

3.5 Political Contribution

- 3.5.1 The Company is in a neutral political position, not providing any Political Contribution to any political parties or any specific political candidates.
- 3.5.2 The Company respects the political rights and liberty under democracy such as, political mob, voting, political party member, Political Contribution or attending political activity of the party. The employee who attends such activity shall attend in personal without claiming the status of Company's Employees. While attending the activity, employee shall not contradict the duty

under the Company's employment including do not make a misunderstanding that the Company is supporting such party.

3.6 Facilitating Payment

The Company does not have any policy allowing any form of Facilitating Payment both direct or indirect and shall not operate and accept any action in exchange for business convenience.

3.7 Revolving Door

The Company does not have a policy on the Revolving Door hiring Public Officer, except necessary and shall follow the following conduct.

- 3.7.1 In the event where the Company is necessary to hire Public Officer, the Company shall not hire the Public Officer for any other benefit or being given any benefit for the Company and shall be choosing, approving and setting the salary that is not violate any related law, rules and regulations.
- 3.7.2 In the event the Employee is in the position that responsible for public policy, the the Company shall set that such Employee to be not conduct any Conflict of Interest such as; disclose confident information of the Company or commit Corruption for an unlawful interest.
- 3.7.3 The Company shall disclose the Revolving Door and information of the employment, who is in the position of public policy making, in the annual report for transparency.

3.8 Conflict of Interest

- 3.8.1 Any performance in the duty of Director, Executive and Employee shall consider Company interest as important and shall avoid any activity that may create Conflict of Interest. Moreover, any performance is not sought for any benefits from data or other things that may know from possessing a position and use it to commit Corruption. Director, Executive and Employee shall report his Conflict of Interest or other related person that is involved in the interest coherent with the Company operation and/or report the ownership of the Company's share whether directly or indirectly.
- 3.8.2 Directors and Executive shall carefully, honestly, reasonably, and freely consider Conflict of Interest that intertwine between the Company, holding Company, associated Company, joint venture and related Company under good wills by considering the best interest for the Company, including disclose such information correctly and completely.

3.9 Whistle Blowing and Rasing Concerns

- 3.9.1 When any Employee see or know of Corruption or suspicious activity that maybe Corruption related to the Company, such Employee is able to seek for suggestion or raising concerns about the Corruption by follow the Anti-Corruption Procedures: Whistleblowing and Raising Concern in the contact info as follow.

3.9.2 When the Company's Internal Audit office sees or knows about Corruption or suspicious activity that maybe Corruption related to the Company, shall report following the Internal Audit Charter.

3.9.3 The Company shall encourage and communicate with the holding Company, associated Company, related Company, assigned agent, business representative or business partner to follow the Anti-Corruption Policy.

4. Related Document/Forms

- None

5. Authority / Interpretation

5.1 Vice president / Executive Vice President of the General Administration Division to be an acting position follow this procedure and shall have the authority to interpret this Anti-Corruption Procedures: Anti-Corruption as it deems appropriate.

5.2 The Company reserves the right to edit, revoke, amend and adjust as appropriate.

6. Enforcement

6.1 This Procedures shall be effective from December 21, 2023 onwards.

6.2 Any regulations, announcements and memorandums which are contradicted with these Procedures shall be voided and this Procedures shall be applied instead.