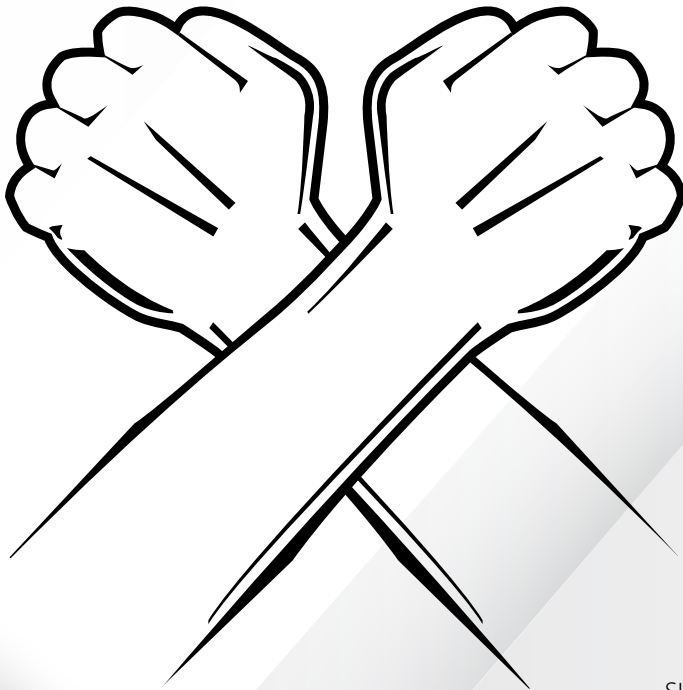




SIAM GLOBAL HOUSE PUBLIC COMPANY LIMITED
AND SUBSIDIARIES

Anti-corruption Policy



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Anti-corruption Policy

Siam Global House Public Company Limited

Siam Global House Public Company Limited (“The Company”) realizes to the importance of Anti-corruption by conducts its business with integrity, honesty and transparency under good corporate governance principle including responsibility towards society, environment and all stakeholders, to demonstrate its intent and determination to combat all forms of corruption. The company has established a written anti-corruption policy to provide clear guidelines for business operations and also aims to all the Company’s personnel to be strictly followed.

Definition in accord with Anti-Corruption Policy

The company	Means	Siam Global House Public Company Limited and Subsidiaries
Personnel	Means	Director, executives, employees of the company, subsidiaries and joint ventures
Executives	Means	Executives of the company from the position level of assistant to the Vice-CEO upwards.
Employees	Means	Employees below executives’ level
Corruption	Means	Any types of bribery whether in the form of offering, promising to give, giving, agreeing to give, requesting, or accepting money, assets, or other benefits to or from a government officer, a government agency, a private organization, or a responsible person, either directly or indirectly, in order that such person acts or refrains from acting in the exercise of his or her duties in order to obtain or retain business or recommend a specific business to the company, or obtain or retain other undue business advantages, except where such act is allowed by laws, rules, notifications, regulations, local customs, or business customs.
Giving or accepting assets	Means	Giving or accepting assets, gifts or other benefits which may count as money from personnel or juristic person, giving in special days, festival season or tradition.
Give a dinner of welcome / Give a reception	Means	Treat for a meal, beverage or any reception services whether in shows, exhibitions, sports events or entertainment activities, etc. which is organized in traditional special occasions.

A charity donation	Means	Donating of money or anything that can be counted in money to the public organization such as school, hospital, temple, foundation, organization for public benefits to the society without <i>expecting anything in return</i> .
Subsidy	Means	Giving or accepting money, things or other benefits that can be counted in money for the purpose of business, product brand or company's reputation, for benefits in building business credit, building business relation and giving in a suitable occasion.
Political Contributions	Means	Political contribution activities, either in form of money and not money, to the politicians, political party's members, political party either directly or indirectly.
A conflict of interests	Means	A set of circumstances that creates a risk that professional judgement or actions regarding a primary interest (the principal goals of the profession or activity) will be unduly influenced by a secondary interest (includes personal benefit or third party by blood relatives that either directly or indirectly)
Facility Fee	Means	Unofficial payments to government officers with the intention to ensure that they will complete some action or process expeditiously.

Anti-Corruption Policy

The company's personnel are prohibited from engaging in or accepting any form of corruption both directly or indirectly cover all businesses in every country and all agencies involved. Compliance with this policy shall be regularly reviewed. Relevant operational guidelines and requirements shall also be revised to ensure alignment with changes in business, rules, regulations, and legal requirements.

Duties and Responsibilities

1. The Board of Directors is responsible for determining an anti-corruption policy and putting in place effective anti-corruption systems in order to ensure that the company's personnel recognize the significance of anti-corruption efforts and cultivate an anti-corruption mindset as part of the company's organizational culture.
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 their compliance with international standards as well as their prudence, suitability, and effectiveness. The Audit Committee is also in charge of handling submission of information, whistle blowing regarding corruption involving the company's personnel, conducting fact-finding investigations, and presenting the matter to the Board of Directors to determine disciplinary action or solutions, as well as giving consultation and ensuring compliance with this Anti-corruption Policy.

3. The Executives are responsible for implementing the Anti-corruption Policy by putting in place relevant systems and promoting the policy as well as communicating it to all employees and related parties. They are also charged with reviewing the suitability of relevant systems and guidelines to ensure alignment with changes in business, rules, regulations, and legal requirements
4. The Audit Manager is responsible for auditing and reviewing operations to ensure their compliance correctly with policies, guidelines and make certain that the control systems are suitable, prudent, and sufficient for handling potential corruption risks. By reporting directly to the audit and risk management committee and perform duties as assigned to audit corruption related to the company beside of the determinate audit planning.

Anti-Corruption Guidelines

1. The company's personnel must follow the Anti-corruption Policy and must do not take action or avoid any direct or indirect involvement with corruption.
2. The company's personnel are prohibited to request or receive any benefits from partners, visitors, or any contacted person who do business with the company.
3. The company's personnel must avoid to give or receive anything from the business contacted person, business partners, except the giving or receiving in occasionally festivals, local customs or business customs.
4. The company's personnel must avoid to treat company's partners for a meal or give a reception for anyone who is going to do business with the company, except the adequate reasons and that treat is in form of general reception.
5. The company's personnel shall not neglect to take action upon detecting an act involving the company that can be construed as corruption. It is their duties to notify their supervisors or responsible persons of such incident and give full cooperation in the fact-finding investigation.
6. The company shall ensure fairness and provide protection to the company's personnel who refuse to engage in corruption or report corruption cases related to the company through a protection procedure which is intended for those who follow the Anti-corruption Policy, file complaints, or cooperate in reporting corruption as defined in the Whistleblowing Policy.
7. The company recognizes the importance of educating and fostering an understanding among third parties whose duties involve or may impact the company on matters where compliance with the Anti-corruption Policy is required.
8. The company determines the compliance assessment following to the *Anti-Corruption Policy* by the Internal Audit Office, who is responsible for monitoring and concluding the compliance for reporting to the Audit Committee. To ensure that mentioned compliance get respond from the related person.
9. The company intends to build and maintain an organizational culture with zero tolerance against corruption in transactions with both public and private sectors.
10. The company shall comply with laws related to anti-corruption in Thailand and every country where it conducts business.

Rules of Practice

1. This Anti-corruption Policy shall apply to cover human resource processes, including recruitment or personnel selection, promotion, training, evaluation, and remuneration. Supervisors at all levels shall communicate the policy to staff so that they can apply it to business activities within their scope of responsibility and supervise its implementation to ensure efficiency.
2. Any implementation of the Anti-corruption Policy shall be in compliance with guidelines set forth in Code of Conduct, Corporate Governance Principles, and guidelines, as well as relevant rules and operational handbooks, and additional guidelines to be formulated in the future.
3. To ensure clarity regarding activities involving high risks of corruption, the company's personnel shall exercise caution and comply with Code of Conduct and guidelines as follows:
 - 3.1 Political Contributions
 - 1) The company shall maintain political neutrality and shall not act in the interest of or provide financial or other support to political parties, political coalitions, political figures, or political candidates, either directly or indirectly, either at the local, regional, or national level.
 - 2) The company's personnel shall strictly comply with the Code of Conduct of the company in relation to political action.
 - 3.2 Any offering or accepting of gifts and hospitality related to the company's business
Any offering or accepting of gifts and hospitality, giving for a reception shall comply correctly in accordance with the regulations and Code of Conduct.
 - 3.3 Donations or sponsorships
Any offering or accepting of donations or sponsorships in the objective for beneficial to the society, which act on behalf of the company shall be transparent and legal. It must be made certain that such donations or sponsorship shall not be used as a pretext for bribery.
 - 3.4 Business relations and procurement with the government
Any offering or accepting improperly of assets or any benefits from partners, the business contacted person or related official staff, or private sector is prohibited in all business activities. Any dealing with the government shall be transparent, honest, and in compliance with relevant laws.
 - 3.5 Facilitation Payment
All facilitation payment to government employees is prohibited either directly or indirectly.
 - 3.6 Hiring of government officer
The hiring of government officers who may cause a conflict of interest is prohibited.
 - 3.7 A conflict of interest
The company's personnel shall perform their duties honestly, avoid any operations which may cause a conflict of interest to the company and not take action against the company's benefit or self-dealing and/or related person, adhering to the company's code of conduct and business ethics.

Communication and Publicity

The company shall communicate and publicize Anti-corruption policy to the company's employees and all stakeholders of the company to build the understanding and support regarding anti-corruption through channels as follow;

- Internal Communication by orientation for new directors and employees, training, sessions or seminars, as well as internal public relations within the company's workplaces and intranet channel.
- External Communication through the company's website and the annual report (56-1 One Report)

Whistleblowing Measures and Channels

1. Whistleblowing Channels

Channels	Details	The person in charge
E-mail	secretary@globalhouse.co.th	Company Secretary
Company's website	www.globalhouse.co.th » Investor Relations » Whistleblowing	Company Secretary
Complaint submission box	Complaint, suggestions submission box in store	Company Secretary
Post Mail	Audit Department Siam Global House Public Company Limited 232 Moo 19, Rob Muang, Muang, Roi Et, Thailand 45000	Audit Department

2. Protection whistle blower

Whistleblowers can choose to make an anonymous disclosure or inform their identity with the company, the company will keep it confidential.

3. Whistleblowing arrangements

- 3.1 The Audit and Risk Management Committee shall consider to conducts the investigation based on information including evidence received from whistleblowers and present to the board of directors to consider disciplinary action or solutions.
- 3.2 Investigation period will be completed within 7 days from the date of complaints received.

Disciplinary action

The personnel who get involved in acts of corruption which infract business ethics and the code of contract, such person will be disciplinary punished as stated in the company's regulation. Besides, the wrongdoer may be legally penalized if such act is illegal.

Supervising, monitoring and reviewing the policy

- The company determines the internal control auditing and assessment included the properly risk management for anti-corruption.
- The company determines the reviewing Anti-corruption policy annually and adjustment as deemed appropriated if there are significant factors change.

This Anti-corruption Policy was approved according to the resolution of the Board Meeting on 29 October, 2021 and effective from 30 October, 2021 onwards.



(Mr. Apisit Rujikeatkamjorn)
Chairman of the Board of Directors



Anti - corruption Policy

SIAM GLOBAL HOUSE COMPANY LIMITED