



SIAM GLOBAL HOUSE PUBLIC COMPANY LIMITED
AND SUBSIDIARIES

Anti-corruption Policy



SIAM GLOBAL HOUSE PUBLIC COMPANY LIMITED
232 moo 19 tambon robmuang amphur muang roi-et 45000



Call Center

1160

✉ callcenter@globalhouse.co.th

🌐 www.globalhouse.co.th



Anti-corruption Policy
Siam Global House Public Co., Ltd

1. Introduction

Siam Global House Public Company Limited (“The Company”) realizes to the importance of Anti-corruption by conducting business with integrity, honesty and transparency under good corporate governance principle. As well as responsibility towards society, environment and all stakeholders.

To demonstrate commitment and determination to combat all forms of corruption. The company has established a written anti-corruption policy as a clear guideline for conducting business that may be at risk of corruption and is carefully and fairly considered and treated. The Company use internal communication channels to foster the correct knowledge and understanding for employees. This will lead to the creation of a corporate culture that opposes and rejects all forms of corruption, serving as a good basis for sustainable organizational development.

2. Definition

The company	Means	Siam Global House Public Company Limited, Subsidiaries, joint ventures, other companies that the company has controlling power over, and business representative.
Personnel	Means	Director, executives, employees of the company
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, abuse of power in office, 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 gifts	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.
Entertainment/ Hospitality	Means	Hosting of meals, beverage, or any reception services, whether shows, sport entertainment, and other expenditures directly related to trade custom.
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 expecting anything in return.

Sponsorship	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	Engaging in any activities that involve personal interests or those of related individuals, whether directly or indirectly, through blood relations or any other means, that may influence decision-making and potentially hinder the maximum benefits of the company.
Facilitation Payment	Means	Facilitation payment refers to a small amount of money paid to government officials unofficially and it is just to make sure that Government officials will either act as per the process or encourage faster responses.
Revolving Door	Means	The act of individuals who are or have been officials of the state/politicians/ advisors to state agencies and have transitioned to work for private companies, relying on relationships or insider information to benefit the private company, may lead to conflicts of interest in the performance of duties between the state organization or regulatory body and the company under supervision. The consequences of such actions aim to create unfair business advantages or establish policies favoring former state officials who are now working in the private sector.

3. Policy and Operational Guidelines

- 1) Employees of the company must adhere to the anti-corruption policy and must not act or engage in corruption, whether directly or indirectly. And shall regularly review compliance with this anti-corruption policy, along with a review of the practices and requirements to comply with changes in business, regulations, rules, and legal requirements.
- 2) Employees of the company and individuals acting as business representatives of the company are strictly prohibited from requesting, engaging in or accepting any form of corruption for benefit to the company, themselves, or others (such as family, friends, acquaintances), whether directly or indirectly. This prohibition extends to all businesses in every country and related entities, both in the public and private sectors. They are also prohibited from taking any actions that may damage the company's reputation.
- 3) Employees of the Company should not neglect or ignore if they find any acts involving corruption with the company. They are required to report such incidents to their supervisors or responsible person through the various channels specified by the company and cooperate in the verification process.
- 4) The company is committed to creating and maintaining a corporate culture that adhere that corruption is unacceptable, both in transactions with the government and the private sector.
- 5) 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.

- 6) 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.
- 7) 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.
- 8) Conducting risk assessments regarding the company's corruption and implementing appropriate and effective internal control processes, on processes, finance, accounting, and data recording, including regular reviews.
- 9) The Company shall support business partners, parties, other companies that the Company has controlling power over, and business representatives, or any individuals acting on behalf of the Company in acknowledging the principles pursuant to this policy.

4. Responsibilities

The Board of Directors

Is responsible for policy setting and oversees a system that supports Anti-corruption effectively to ensure that employees of the Company realize the importance of anti-corruption principles and cultivate such values as a part of the organizational culture.

The Audit and Risk Management Committee

Is responsible for reviewing the financial reports and accounting system, internal control system, internal audit system, and risk management system in order 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 consider a disciplinary action or resolve such problems, as well as giving consultation and ensuring compliance with this Anti-corruption Policy.

The Sustainability and Corporate Governance Committee

Is responsible for considering, establishing, reviewing, and improving policies and practices related to Anti-corruption, as well as overseeing compliance with policies and practices related to anti-corruption.

Executive Committee

Is responsible for promoting and supporting anti-corruption policies, communicating to employees and all stakeholders, and reviewing the appropriateness of systems and measures to align with changes in business, regulations, and legal requirements.

Internal Audit Office

Has the duty and responsibility to audit and review the performance of work in accordance with the policy, guidelines, in order to ensure that the control system is appropriate and adequate for any potential corruption risk. And directly reporting to the Audit and Risk Management Committee and fulfilling the duties assigned by the Audit and Risk Management Committee regarding the examination of corruption-related matters concerning the company, beyond the scheduled audit plan.

Risk Management Working Group

Is responsible for conducting risk assessments related to the corruptions and proposing measures and practices regarding Anti-corruption adequately to the Sustainability and Corporate Governance Committee, and the Audit and Risk Management Committee.

Employees at all levels of the company

have responsibilities to do understand and perform their duties in accordance with the anti-corruption policies and measures.

5. Related measures and practices

5.1 Giving or Receiving Gifts, Hospitality, or Reception related to the Company's business

- 1) The Company's personnels must not request, accept to participate in social activities, sports events, hospitality, reception, gifts, or incentives for benefits of themselves or others from persons involved in the business.
- 2) If it is unavoidable, managers and employees may accept benefits or gifts for business advertising or customary practices in case the value of the benefits or gifts does not exceed 3,000 Baht. In cases where the value exceeds 3,000 Baht, managers and employees must notify supervisors in writing and submit the benefits or gifts to the company.
- 3) In the event that managers and employees act as representatives of the company and join entertainment events or social activities of business partners or travel for off-site training or work-related activities, and receive benefits or gifts exceeding 3,000 Baht, whether obtained through raffles, draws, or commemorative items, they are to adhere to the same guidelines as mentioned above.
- 4) Expenditures for entertainment and business hospitality, such as hosting meals and beverages, hosting sporting events, and other related business or trade customs, are permissible as long as they are reasonable and do not compromise decision-making in the performance of duties. Such expenses should not result in conflicts of interest and must comply with legal regulations, following the certification criteria specified by the company.

5.2 A Charity Donation and Sponsorship

The giving or receiving of donations or sponsorships to any organization with objectives for the benefit of society, carried out on behalf of the company, must be transparent, following the company's procedures and complying with the law. Additionally, it must be ensured that the donated funds or sponsorships are not misused for corrupt purposes, adhering to the code of conduct and business ethics of the company.

5.3 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 Code of Conduct of the Company.

5.4 Conflict of Interests

- 1) The Company's personnel must perform their duties with honesty, avoiding any actions that could create conflicts of interest with the company. And refrain from conducting any action that may compromise the company's interests or seek personal and/or related-party benefits, adhering to the business ethics and code of conduct of the company.
- 2) The company has policies for the recruitment or selection of personnel, promotions, training, performance evaluations, and compensation that are fair and sufficient to prevent conflicts of interest that may lead to internal corporate corruption.
- 3) The Company's personnel are prohibited from engaging in making decisions involving transactions in which they or related parties have a personal interest or stand to gain or lose in the matter.

5.5 Facilitation Payment

The company does not have a policy of providing any form of facilitation payment, either directly or indirectly. By not engaging in any action and will not accept any conduct in exchange for business facilitation.

5.6 Hiring Government Officials (Revolving door)

The company has no policy of hiring government officials unless necessary under specific circumstances. The board shall consider the selection criteria based on appropriateness to ensure that there is no conflict of interest prior to the appointment. Additionally, the company will disclose the background information of such individuals in its published documents, following the guidelines of the relevant regulatory authorities.

5.7 Procurement

The company shall conduct the procurement transparently and auditable, and strictly comply with policy, procurement regulations of the Company. By setting clear budget limits and approval authority for procurement, distinct division of responsibilities to ensure a balance of power and appropriate checks and balances between each other. In this process, all transactions must be supported by complete and clear documentation, and regular audits are conducted to verify accuracy consistently.

5.8 Risk Assessment

Risk Assessment in providing benefits to government officials is a crucial step for the company to establish appropriate internal control measures. The company designates the risk management working group to assess the risks associated with various transactions between the company and government agencies, which may involve procedures or processes for providing benefits and corruption. The risk assessment is conducted at least annually, along with a review of the existing risk management measures to ensure that the risks are maintained at an acceptable level.

5.9 Internal Control and Audit

The company has established an internal audit and control system to ensure that the specified processes or operational procedures will help prevent corruption in the business operations. This includes the efficient storage and maintenance of data, supporting documents, financial reports, and financial data backups in a computer system, ready for auditing and verification to comply with anti-corruption measures.

5.10 Human Resource Management

- 1) This anti-corruption policy extends to the human resources management processes, including the recruitment or selection of personnel, promotions, training, performance evaluations, and compensation, to ensure transparent and fair human resources management operations in line with the measures Anti-corruption.
- 2) New employees will receive orientation on the 1st and 16th of each month to be informed about the contents of business ethics and code of conducts, including Anti-corruption policy. This ensures that employees at all levels understand and are aware of the importance of adhering to the anti-corruption policy.
- 3) All employees will receive regular training on anti-corruption practices to enhance knowledge, understanding, and apply correctly. The training also emphasizes the reporting channels for raising concerns, reporting cases, or suspicions of giving or receiving benefits or engaging in corruption.

5.11 Communication

- 1) All employees can access the company's anti-corruption policy through the company's internal communication channel (SharePoint) and the company's website www.globalhouse.co.th. The company will notify employees of any significant changes to the information.
- 2) The company will communicate this policy to business partners, business representatives, service providers, contractors, and other stakeholders through the company's website and the annual report (56-1 One Report).

6. Whistleblowing and measures to protect whistleblowers.

Whistleblowing and complaints channels

Channels	Details	The person in charge
E-mail	secretary@globalhouse.co.th	Company Secretary
Company's website	https://globalhousenews.com/whistleblower-with-complaints/	Company Secretary
Complaint submission box	Complaint, suggestions submission box in store	Company Secretary
Post Mail	Audit Office Siam Global House Public Company Limited 232 Moo 19, Rob Muang, Muang, Roi Et, Thailand 45000	Audit Office

Protection Measures for whistleblowers or complainants

- Whistleblowers or complainants can choose not to disclose their identity if they believe it may impact their job responsibilities or if they feel that disclosure may not be safe. In cases where the name is disclosed to the company, the company will report progress and provide the facts to the complainants.
- The company will keep related information confidential, considering the safety and well-being of the complainant. Protection measures have been established for the whistleblower or complainant and/or the information provider and/or the cooperating party in verifying the facts. They will be protected against unfair practices, such as changes in job position, job nature, workplace, be suspended from job, harassment, interference with work, termination, resulting from the reporting of complaints.

Procedures for receiving a whistleblowing

1) Receiving report and gathering facts

When receiving a report of misconduct or a complaint, the recipient in various channels should notify the whistleblower or complainants, in case the whistleblower reveals their identity. Additionally, the recipient should gather relevant facts and forward the matter to the investigation committee for further inquiry. The investigation process should be completed within 45 days from the date of receiving the report or complaint.

2) Investigation and action taken against the complainant

The investigation committee is responsible for conducting a factual examination, processing, and screening the information received to consider the impact, as well as appropriate processes and management methods for each case. The committee must report the results of the investigation of reported misconduct or complaints to the Audit committee and/or the executive committee for consideration. The investigation and conclusion of facts must be completed within 45 days from the date of receiving the complaint or report of misconduct.

The Audit Committee considers and summarizes the results of actions regarding complaints or clues of wrongdoing to the Board of Directors for consideration of penalties.

In this regard, the procedures of investigating facts have established measures to take actions to suspend violations or non-compliance with Code of Conduct and mitigate damage to those affected. This considers the overall severity of the damage, including specifying necessary measures to protect complainants or whistleblowers and those who assist in the fact-investigation process, who may be impacted.

3) Summarizing and reporting results

The Investigation Committee reports the results of the consideration to the complainant or whistleblower (in case of self-disclosure) to be acknowledged within 7 working days from the date of conclusion.

7. Disciplinary Action

Employees of the company engaging in corruption are in violation of the Business Ethics and Code of Conduct. They will be subject to disciplinary action according to the Company's regulations and may also face legal punishment if such actions violate the law.

In this regard, the company will not demote, penalize, or yield negative consequences to directors, executives, and employees who refuse to engage in corruption, even if such actions result in the company losing business opportunities. Disciplinary measures imposed by the company's regulations will be considered final decisions by the board of directors.

8. Reviewing the Policy

The company will ensure that there is a review and improvement of the anti-corruption policy at least once a year to ensure that the measures and guidelines for anti-corruption are appropriate and aligned with changing corruption-related risks.

This anti-corruption policy has been considered and approved by the Sustainable Corporate Compliance Governance Committee. And also, has been approved by the board of directors' meeting No. 1/2024 on February 9, 2024. This policy shall be effective from February 9, 2024 onwards.



(Mr. Apisit Rujikeatkamjorn)

Chairman of the Board of Director

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