PL-CEO-O-COMP-003
Anti-Bribery and Corruption Policy

Document Approvals

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Responsible Executive CEO
Approver Board of Directors of Siam City Cement Public Company Limited
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## Version History

The following table records all the revisions made to this document:

<table>
<thead>
<tr>
<th>Version</th>
<th>Date</th>
<th>Description</th>
<th>Revised by</th>
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</thead>
<tbody>
<tr>
<td>0.1</td>
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<td>Initial Version</td>
<td>Pattranith L.</td>
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<td>0.2</td>
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<td>Review, Revised</td>
<td>Wutthipong S.</td>
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<tr>
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<td>Approved</td>
<td>Vorathep R.</td>
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<td>0.4</td>
<td>13 Jul 15</td>
<td>Approved</td>
<td>EXCO</td>
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<tr>
<td>0.5</td>
<td>21 Jul 15</td>
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<td>Wasana C.</td>
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<td>1.2</td>
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<td>Review, Revised</td>
<td>Prasert K.</td>
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<td>13 Oct 16</td>
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<td>Prasert K.</td>
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<tr>
<td>2.2</td>
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<td>Approved</td>
<td>Siva M.</td>
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### Managerial Approval

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<th>Responsible Executive</th>
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<tr>
<td>Siva Mahasandana</td>
<td>Wutthipong Songwisit</td>
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</table>

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Anti-Bribery and Corruption Policy

1. Objective
   Siam City Cement Public Company Limited (SCCC) and its Group companies commit to be a good corporate citizen and shall comply with all applicable laws and regulations to its business and operations. As one of the key initiatives, SCCC has participated in the anti-bribery and corruption program, namely the “Private Sector Collection Action Coalition against Corruption” to demonstrates the Group’s clear determination against bribery and corruption.

   This Anti-Bribery and Corruption Policy is established to set up the acceptable and non-acceptable guidance on how to recognize and deal with the bribery and corruption related issues.

2. Scope
   This Policy applies to all the SCCC and its Group companies’ employees, officers, management, directors as well as any person who represents or performs work on behalf of any entities under the SCCC and its Group companies.

3. Definitions
   - Fraud
     Wrongful or criminal deception intended to result in personal gain or by the law of Director, Management and employee of SCCC and its Group companies, customers, suppliers or contractors such as falsifying financial documents and disbursement, asset misappropriation, corruption
   - Corruption
     To offer, promise or give any undue pecuniary or other advantage, whether directly or through intermediaries, on order to obtain or retain business or other improper advantage.
   - Facilitation Payment
     Form of payment, or giving money to government officials for the purpose of performing or supporting the implementation to be faster than the normal procedure, or to obtain a business or advantage
   - Kickback
     Form of a bribe where a portion of the undue advantage is 'kicked back' to the person who gave the undue advantage
   - Political Contributions
     Giving or offering anything of value e.g. money, goods, or any other benefits to politician, political parties or individuals as well as political activities directly or indirectly
Charitable Donation Activities that involve spending money without tangible rewards, including spending money for projects, activities, religion and education for the benefit of the community, society and population groups.

4. Responsibilities

Board of Directors of SCCC and its Group companies shall be responsible and accountable to set up an anti-corruption policy, to provide tools to be used against corruption and to ensure that employees of SCCC and its Group companies are aware of the importance of anti-corruption and implement to be the corporate culture continuously.

Audit Committee shall be responsible to assist the Board in fulfilling its responsibility to the shareholders and the regulatory authorities relating to the financial reporting practices, the internal control systems which cover the control of anti-bribery and corruption, to ensure that the company has adequate systems in regulating and opposing against corruption and oblige under the law and ethical requirements.

Governance, Risk and Compliance Committee shall be responsible for matters of non-financial compliance, including the Company's overall corporate governance risk management, compliance, code of business conduct, and anti-bribery and corruptions as relevant and applicable to the Company and to make recommendations to the Board with respect to such policies and procedures to protect the reputation and interests of the Group.

Chief Executive Officers (CEO) of the SCCC and its Group companies have the overall responsibilities for ensuring that this Policy is complied with laws and ethical obligations and that all related activities under the SCCC and its Group companies’ control are in compliance with this Policy through the pre-approval process. Any sensitive activities shall be determined and reviewed from time to time.

The Management at all levels shall be responsible for communicating and ensuring that employees are aware and understand the policy, as well as support, encourage and control to ensure that employees and those involved with policy comply effectively.

Head of Compliance shall have the primary responsibility for implementing appropriate directives, procedures, monitor their suitability and effectiveness and deal with any queries on the Policy’s interpretation.

Each employee shall comply with this Policy and shall be responsible for reporting any suspected doing and wrongdoing related to bribery and corruption. They should first notify their Line Manager or Head of Compliance or use the INSEE
Speak Up Line as soon as it is believed or suspected that a breach of this policy or wrongdoing has occurred or may occur in the future.

5. Policy Directives

Personnel at all levels of SCCC and its Group companies must comply with the Policy and its Procedure.

5.1 Board of Directors, Management and employees has the duty to comply with local and other country’s anti-corruption laws and regulations and must not be involved in any form of corruption even though it is the benefit of the business, family, friends, or others and must adhere to the ethics strictly.

5.2 Prohibited to offer, promise or give a bribe or to request, agree to receive or accept a bribe. The bribe covers an inducement or reward offered, promised or provided in to gain or retain any commercial, contractual, regulatory or personal advantage including any financial or other advantage given or requested for improper performance of a public function or business activity.

5.3 All shall not make or arrange any form of facilitation payments or “kickbacks”. However, in certain circumstances, it may be acceptable for any facilitation payments that are typically small, unofficial payments, gifts or other advantages made to secure or expedite a routine government action by government official. The employee must therefore avoid any activity that may lead to a facilitation payment or kickback. Such activity must also be in compliance with the Gifts, Entertainment and Hospitality Policy.

5.4 No contributions including charitable donation shall be offered or made on behalf of the SCCC and its Group companies without prior approval of the CEO. Only charitable donations that are legal and ethical under laws and practices shall be made which are to be in accordance with the community program and/or Corporate Social Responsibility Program of the companies within the SCCC and its Group companies. Moreover, those organizations must be a legal and authorize to ensure that the charitable donations is not used for bribery.

5.5 The company has a policy regarding political neutrality which states that it will not assist in supporting political parties, political groups, as well as political individuals whether directly or indirectly, by prohibiting any person to support and make a donation, as well as make transactions that result in political support. The authorized person who has the authority to approve the transaction based on the regularity and rules of the company cannot approve any transaction that involves political support in all forms.
5.6 Provide a proper and regular internal control and risk assessment system to prevent the corruption situation, as well as reviewing and evaluating operational corruption risks at least once a year.

5.7 Provide a transparent mechanism for financial reporting which are international accounting standards.

5.8 Provide a Human Resources process must reflect the anti-corruption policy.

5.9 Procurement must comply strictly with Procurement Policy and Procedures for the sake of transparency and audit at every step.

5.10 Provide communication channels and ongoing training to company personnel to achieve a real understanding and knowledge about the measures taken against corruption, including the ability to report suggestions and complaints about corruption thoroughly with protection measures that identify the whistleblower clearly.

6. Compliance and Consequence for Non-Compliance

All entities within SCC and its Group companies and their employees, officers, management, directors as well as any person who represents or performs work on behalf of any entities under the SCC and its Group companies shall ensure full compliance with this Policy. They are expected not to get involved in corruption whether directly or indirectly including they have to assure that appropriate resources are available and reviews are regularly undertaken on a regular basis to ensure that the implementation and application of this Policy remain robust at all times.

Anyone who breaches the Policy shall be subject to disciplinary action, which could result in dismissal or termination for any misconduct.

7. Policy Measurement Metrics

This Policy shall be measured its effectiveness and awareness through the number of any suspected doing and wrongdoing related to bribery and corruption reported.

8. Policy Exceptions

No exceptions are permitted.

However, this policy shall be subject to a review and amendment in accordance with any changes in law and regulation issued by the authority on the subject.

Variations to this Policy shall be reviewed by the Policy’s responsible Executive and proposed to the Executive Committee and the Governance, Risk and
Compliance Committee for endorsement, prior to submitting to the Board of Directors for approval.

9. Reference
   a) Code of Business Conduct
   b) Gifts, Entertainment and Hospitality Policy
   c) Corporate Social Responsibility Policy
   d) Whistleblowing Policy

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