

## Anti-corruption Policy

### SCG PACKAGING PUBLIC COMPANY LIMITED

SCG Packaging Public Company Limited (“the Company”) conducts its business with fairness based on a philosophy that the Company shall demonstrate a keen sense to social responsibility and the best interests of its stakeholders in alignment with the principle of Corporate Governance, SCGP’s Code of Conduct, and stakeholder engagement policy and guidelines. In 2020, the Company has become a member of Thailand’s Private Sector Collective Action Coalition Against Corruption (CAC).

In order to provide clear guidelines for business operations and develop the Company into an organization of sustainability, the Company has reviewed the previously issued Anti-corruption Policy and implemented this revised Anti-corruption Policy to ensure that the Company has in place a policy that defines responsibilities, guidelines, and appropriate operational requirements to prevent corruption in all of the Company’s business activities and that all decisions on business operations potentially incurring risk of corruption are considered and executed with due circumspection. The meeting of the Board of Directors no. 211 (7/2019) has, therefore, established the written Anti-corruption Policy to provide clear guidelines for business operations and develop the Company into an organization of sustainability. The meetings of the Board of Directors no. 224 (8/2020) and no. 229 (5/2021) then have resolved to further review the written Anti-corruption Policy for better adequacy.

#### Definitions

Corruption refers to 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.

Facilitation Payment refers to a small amount of expenses unofficially paid to the government officers simply to ensure that the government agencies will carry out the business in an orderly manner or to expedite the process.

The Company’s personnel refers to directors, executives, and employees of the Company and its subsidiaries.

A subsidiary refers to a subsidiary company in accordance with the consolidated financial statements of the Company.

## **Anti-corruption Policy**

The Company will not accept any form of corruption. The Company's personnel is to strictly comply with the Anti-corruption Policy and is prohibited from engaging in or accepting any form of corruption, either directly or indirectly. This shall apply to 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 establishing 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 Corporate Governance and Nomination Committee has a duty and responsibility to oversee that a proper anti-corruption policy for business operation is implemented.

3. 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, currency, and effectiveness. The Audit Committee is also in charge of handling submission of information regarding corruption involving the Company's personnel, conducting fact-finding investigations, 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.

4. The Chief Executive Officer, the Management and 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 measures to ensure alignment with changes in business, rules, regulations and legal requirements.

5. The Internal Audit Director is responsible for reviewing risk assessment and offering recommendations on the formulation of corruption risk prevention procedures and approaches to present to the Audit Committee and the Board of Directors. The Internal Audit Director is also responsible for auditing and reviewing operations to ensure their compliance with policies, guidelines, Delegation of Authority, procedures, laws, and requirements of regulatory agencies and make certain that the Company's control systems are suitable, prudent, and sufficient for handling potential corruption risks. Outcomes of such audits and reviews shall be reported to the Audit Committee.

## **Anti-corruption Guidelines**

1. The Company's personnel and subsidiaries shall follow the Anti-corruption Policy and SCGP's Code of Conduct and avoid any direct or indirect involvement with corruption.

2. The Company's personnel shall not be negligent to take action upon detecting an act involving the Company which can be construed as corruption. It is their duties to notify their supervisors or responsible persons of such incidents and give full cooperation in the fact finding investigation. Should there be any inquiries or questions, they may consult their supervisors or persons designated to oversee compliance with SCGP's Code of Conduct through various channels provided.

3. 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

4. The Company recognizes the importance of disseminating, 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.

5. The Company strives to foster and maintain an organizational culture with zero tolerance against corruption in transactions with both public and private sectors.

6. The Company's Risk Management Committee is responsible for preemptively assessing potential corruption risks. The Internal Audit Office has put in place appropriate and efficient audit processes and internal control systems for processes, finance, accounting, record keeping, and others, which are subject to regular review.

7. The Company shall comply with laws related to anti-corruption in Thailand and every country where it conducts business.

8. The Company and its subsidiaries shall consider taking appropriate action to ensure that its agents, contract counterparties, or any person acting on behalf of the Company and its subsidiaries are informed of the principles set forth in this Policy.

## **Rules of Practice**

1. This Anti-corruption Policy shall also apply to human resource processes, including nomination or 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 SCGP's Code of Conduct, Corporate Governance Handbook, stakeholder

engagement policy and guidelines, as well as relevant rules and operational handbooks, and additional guidelines to be formulated in the future.

3. Ensure clarity regarding activities involving high risks of corruption, the Company's personnel shall exercise caution and comply with SCGP's Code of Conduct and guidelines as follows:

3.1 Gifts and Hospitality

Any offering or accepting of gifts and hospitality shall comply with SCGP's Code of Conduct.

3.2 Donations or Sponsorship

Any offering or accepting of donations, sponsorships or assets shall be transparent and legal. It must be made certain that such donations, sponsorship or assets shall not be used as a pretext for bribery.

3.3 Facilitation Payment

All facilitation payment to government employees, both directly and indirectly, is prohibited.

3.4 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 SCGP's Code of Conduct in relation to political action.

3.5 Hiring of government employees (Revolving Door)

The hiring of government employees or former government employees who have retired from their positions for no more than two years to hold any positions that may create a conflict of interest is prohibited. The Company shall set forth the procedures for disclosing the hiring of government employees or former government employees to ensure transparency and verifiability.

3.6 Business relations and procurement with public and private sectors

Any offering or accepting of bribery is prohibited in all business activities. Any dealing with public and private sectors shall be transparent, honest, and in compliance with relevant laws.

**Communication and Training**

1. The Company shall communicate and disseminate the Anti-corruption Policy to the Company's personnel through various channels, such as orientation for new directors and

employees, training sessions or seminars, as well as internal public relations within the Company's workplaces and electronic systems. The Company shall also periodically communicate to the Company's personnel various forms of corruption, risks of being involved in corruption, and how to submit information. This is to ensure that the Company's personnel acknowledge and implement the policy.

2. The Company shall communicate and disseminate the Anti-corruption Policy as well as the Company's whistleblowing channels to the public, subsidiaries, associates and stakeholders via various channels, such as websites, annual reports, and annual registration statements, to foster an understanding and support anti-corruption efforts

3. The Company's personnel who have any inquiries about this policy may consult their supervisors, Secretary to the Audit Committee, or the Internal Audit Director

### **Disciplinary Action**

The Company's personnel who fail to comply with this policy are subject to disciplinary action and may also be subject to legal punishments if they commit an offense under the law.

### **Whistleblowing Measures and Channels**

The Company has established mechanisms for whistleblowing, complaint handling, and the processing of cases related to violation of laws, rules, and SCGP's Code of Conduct or to behavior of the Company's personnel that may be suspicious of corruption. The Company has also prescribed appropriate whistleblower protection measures according to the Whistleblowing Policy to provide a clear guideline and enhance the efficiency of corruption and misconduct complaint handling.

This Anti-corruption Policy was revised according to the resolution of the Board of Directors' Meeting on July 27, 2021 and effective from July 27, 2021 onwards.

**Announced on July 27, 2021.**

*-Signed by-*

**(Mr. Prasarn Trairatvorakul)**

**Chairman of the Board of Directors**