

Anti-corruption Policy

**Sherwood Corporation (Thailand) Public Company Limited
and Subsidiary**



Approve By.....

(Mr. Sirinat Chayanan)

President

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Resolution of the Board of Directors Meeting No 4/2561 on 20th September 2561 approved Anti-corruption Policy.

Sherwood Corporation (Thailand) Public Company Limited and Subsidiary conducts its business with fairness based on/ in alignment with applicable laws and regulations of Thailand and other countries, achieve acceptance from various stakeholders. In 2017, The Company participated “Collective Action Coalition in Anti-corruption Policy enacted by Thai Private Sector” in order to corroborate the Company’s standpoint and emphasize on every Anti-corruption case in direct or indirect manner. The Anti-corruption Policy was written in order to conduct for Board of Directors, Executive and all Staff

Anti-corruption Definition

Corruption means conducting, or abstaining from conducting one's duties, or exerting one's power improperly in any types of bribery, whether for the giving, promising or agreeing to give, demanding or accepting money, assets, or other inappropriate benefits from the government officers, government sectors, private sectors, or responsible person either in direct or indirect action so that such person could proceed or disregard his/her function in order to acquire, retain the business, recommend specific company to the entity, or achieve any improper benefits in business transaction. Exception shall be applied in case of laws, regulation, statement, standard, custom, or business traditions enable to do so.

Purpose

The Board of Directors, all Executive and staffs of The Company are committed to conducting operations in compliance with applicable laws, good governance and Anti-corruption guideline.

Roles and Responsibilities

1. The Board of Directors is responsible for determining the policy, monitoring, and forming an effective system supporting Anti-corruption act in order to affirm that the Management Team intensively concerns, emphasizes, and cultivates Anti-corruption mindset as the company’s culture.
2. The Audit Committee is responsible for revision of financial and accounting reports, internal control, internal audit function, and risk management so that such operations are concise, appropriate, effective, and conformed to global standard.
3. Managing Director and All Executives are responsible for determining Anti-corruption system, promoting, and encouraging Anti-corruption manner conveyed to all staff and related parties. This also includes reconsideration on system or regulation in order to best adjust with business changes, regulation, standard, and laws.

4. The Directors and all staffs are responsible for understanding and complying with the policy of the Company. All are required to avoid any activity that might lead to breach the policy of the Company. The Company shall arrange internal communication through training, orientation to staffs and announcement on the board of the Company. The Company shall publicly disclose on the Company's website and communicate to all stakeholders.

Anti-corruption Guidelines

1. The Board of Directors, all Executive and staff must follow with Anticorruption Policy and the Code of Conduct by strictly avoiding involving.
2. All staffs shall not be negligent in any corruption conditions involved directly with the Company. All staffs must notify such act to supervisors or responsible person. Any queries or questions are needed to be consulted by the supervisor or a responsible person who monitors the Code of Conduct compliance provided in particular channels.
3. The Company shall ensure fairness and protection of its staff who denies or informs clues and evidence corruption cases relating to the Company by applying Protection Policy for appellant or persons who incorporate with Anti-corruption information as stated in the Whistleblower and Protection Measure.
4. A person who commits the corruption under the name of the Company. This means such person is needed to consider discipline followed by the Company standard. Conviction on laws may be applied in case such act violates the laws.

Operative Measures of the Company

All staffs must follow every policies of the company which were set by the Board of Directors and communicated to them. All policies of the Company includes: The Board of Directors establishes various policies. For personnel at all levels to adhere to as a guideline and to communicate with relevant employees to be informed of the policy of the company which the company policy consists of

- Good Corporate Policy
- Anti-corruption Policy
- Stakeholders Policy
- Sustainable Policy
- Open Data Integrity and Transparency Policy
- No Gift Policy, Donation and Political assistance
- Procurement
- Code of Conduct and Employee Disciplinary
- Welfare Manual
- Whistleblower and Protection Measure
- Code of Conduct

Whistleblower and Protection Measure

The Company will ensure fairness and protection of its staffs including those who act as whistleblowers who report clues and evidence about corruption involving the Company and its subsidiaries. Additionally, Staffs who refuse to cooperate will also be protected. Our protective measures have been provided to whistleblowers as well as those who give the full support to making a corruption report as stipulated in our Whistleblower Policy. Offenders of corruption are considered those who violate employment regulations in regard to personnel management. These offenders will receive disciplinary punishment as well as legal punishment if such offences are also against the law.