

Anti-Corruption Policy

**Salee Colour Public Company Limited
and Subsidiaries**

Anti-Corruption Policy

Salee Colour Public Company Limited and its subsidiaries have actively promoted anti-corruption awareness among personnel within the organization, as the Board of Directors recognizes the importance of corruption prevention. General principles relating to anti-corruption have been incorporated into the Code of Conduct since its initial establishment.

This Anti-Corruption Policy is issued to formally declare the Company's intention to prevent all forms of corruption and to ensure that everyone within the organization shares a common understanding of anti-corruption practices under a unified policy. It also aims to inform all relevant stakeholders of the Company's firm commitment to combating corruption.

Directors, executives, and employees are strictly prohibited from engaging in any form of corruption, whether directly or indirectly, for their own benefit or for the benefit of their family, friends, or acquaintances. This includes receiving, offering, or promising bribes—whether in monetary or non-monetary form—to government agencies or private entities with which the Company conducts business or has any dealings. All personnel must fully comply with the Company's Anti-Corruption Policy.

Duties and Responsibilities

1. The Board of Directors is responsible for approving policies and supporting anti-corruption efforts to ensure that all personnel understand and recognize the significance of corruption-related issues. In cases where the Audit Committee reports incidents of corruption affecting the company, the Board shall provide guidance, consider appropriate disciplinary actions, and work with management to resolve the issues.
2. The Audit Committee has the following responsibilities:
 - 2.1 Review the anti-corruption policy proposed by management to ensure its suitability for the company's business model, operating environment, and corporate culture, and submit it to the Board of Directors for approval.
 - 2.2 Consider and recommend necessary updates to the policy in coordination with management and the Company Secretary.
 - 2.3 Review internal audit reports and corruption risk assessments to ensure the internal control system minimizes corruption risks and aligns with the company's operations.
 - 2.4 Receive and investigate corruption reports involving personnel, and present findings to the Board of Directors for further action or disciplinary decisions.

3. The Internal Audit Department has the following responsibilities:
 - 3.1 Conduct audits as per the internal audit plan and report findings on internal controls and corruption risk assessments to the Audit Committee.
 - 3.2 Carry out additional investigations related to corruption as assigned by the Audit Committee beyond the approved audit plan.
4. The Management Team has the following responsibilities:
 - 4.1 Propose the anti-corruption policy to the Audit Committee.
 - 4.2 Communicate the policy to all personnel and relevant stakeholders.
 - 4.3 Regularly review and update the policy to reflect business or legal changes and submit revisions to the Audit Committee.
 - 4.4 Support the Audit Committee in corruption investigations as requested, including assigning appropriate team members to assist in fact-finding.

Anti-Corruption Practice Guidelines

All directors, executives, and employees must strictly comply with the Company's anti-corruption policy and code of ethics, regardless of whether they are directly or indirectly involved.

1. Do not engage in any conduct that suggests offering or accepting bribes in order to gain improper benefits in matters under their responsibility. The following rules must be observed:
 - 1.1 Do not give or accept gifts, cash, checks, bonds, stocks, gold, gems, real estate, or similar items from stakeholders in both public and private sectors.
 - 1.2 Do not accept any assets, gifts, or benefits that may influence your duties. Before accepting any souvenir, ensure it complies with laws and company regulations. Any gift should be of modest value and appropriate to the occasion.
 - 1.3 Do not offer any items or benefits intended to influence decision-making or create unequal treatment among business partners. Giving occasional gifts is allowed only if the value is not excessive.
 - 1.4 Do not act as an intermediary to offer money, gifts, or benefits to business partners, government officials, or other entities in exchange for special privileges or to encourage non-compliance with laws or regulations.
2. Procurement must comply with company regulations and be transparent and auditable.

3. Business entertainment and related expenses are allowed but must be reasonable and supported by evidence.
4. Charitable donations must follow these principles:
 - 4.1 Donations using company funds or assets must be made in the company's name only, to certified or reputable organizations (e.g., foundations, temples, hospitals) through proper procedures and with verifiable records.
 - 4.2 Personal donations are allowed but must not create suspicion of corruption or personal gain.
5. Sponsorships or support using company funds must clearly state the company's name, serve business or reputational purposes, and include proper documentation and proof.
6. Do not engage in internal political activity or use company resources for such purposes. The company maintains political neutrality and does not support any political party, directly or indirectly.
7. If you witness or suspect corrupt behavior affecting the company, you must report it immediately to management, the Company Secretary, or through the whistleblowing channels outlined in this policy.
8. Directors and executives must promote awareness, provide guidance, and set a strong example of integrity and ethical conduct to support compliance with the anti-corruption policy.

Types of Corruption

1. Corrupt acts involving the organization, such as offering or accepting bribes by company personnel with public or private sector officials.
2. Violations of company procedures or internal controls that may lead to suspected corruption.
3. Actions causing financial loss or reputational damage to the company.
4. Illegal, unethical, or immoral conduct that violates business ethics.

Reporting Channels

The Board of Directors has assigned the Audit Committee to receive and review any reports or complaints related to suspected corruption, either directly or indirectly, through the channels below. The report should include relevant details, the whistleblower's name, contact address, and phone number. You can report via:

1. Email to Chairman of the Audit Committee: rapee60@gmail.com
2. Email to Chairman of the Executive Committee: rach@saleecolour.com
3. Phone: 02-3232601-8 ext. 1001 (Chairman of the Executive Committee)

If the whistleblower or complainant has a complaint regarding the Management or the Company Secretary, please submit the complaint directly to the Chairman of the Audit Committee.

Persons who may report whistleblowing or complaints related to corruption include all stakeholder groups of the Company, such as shareholders, customers, business competitors, creditors, government agencies, communities, society, management, and employees. The Company will maintain the confidentiality of the whistleblower.

Whistleblower Protection and Confidentiality Measures

The Company is committed to protecting the identity and safety of whistleblowers or informants through the following measures:

1. Anonymous Reporting: Whistleblowers may choose to remain anonymous if disclosure could lead to personal risk or harm. However, revealing identity can help the Company provide updates or respond to issues more effectively.
2. Confidentiality Assurance: The Company will not disclose the whistleblower's identity or any related information unless required by law or with the whistleblower's explicit consent.
3. Protection from Retaliation: Whistleblowers will be protected from threats, intimidation, harassment, or unfair treatment by individuals impacted by the report.
4. Right to Request Protection: Whistleblowers who feel at risk or believe they may face harm may request protection from the Company. The Company may also proactively provide protection if deemed necessary.
5. Good Faith Requirement: Whistleblowers must act in good faith. Reports intended to defame, harass, or harm others without basis may result in legal action or disciplinary measures, depending on the severity.

Investigation and Disciplinary Procedures

1. Upon receiving a complaint, the management, Company Secretary, and Audit Committee will screen and investigate the facts.
2. During the investigation, a designated executive may update the whistleblower or complainant on the progress.
3. If there is sufficient evidence indicating wrongdoing, the accused will be informed of the charges and given the opportunity to defend themselves by providing supporting information or evidence.
4. If the accused is found to have committed fraud, it will be treated as a violation of the Company's anti-corruption policy and business ethics. Disciplinary action will be taken according to company regulations. If the act is illegal, legal action may follow.

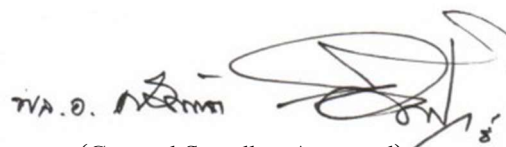
Disciplinary actions in accordance with the Company's regulations shall be final and binding as decided by the Management. In cases where complaints are made against the Management, the Company Secretary, or the Audit Committee shall be responsible for receiving the complaint, conducting fact-finding investigations, and reporting the findings to the Board of Directors for joint consideration and determination of appropriate disciplinary measures.

Policy Communication

To ensure everyone in the organization understands the anti-corruption policy, the Company will:

1. Display the policy in a visible area accessible to all employees.
2. Communicate the policy through official channels, such as the Company website and the 56-1 One Report.
3. Provide training on the policy for all new employees.
4. Review and update the policy annually.

This policy was reviewed and approved at the Board of Directors Meeting No. 4/2024 on November 14, 2024.



General Somdhat Attanand

Chairman of the Board of Directors