



บริษัท สากล เอนเนอจี้ จำกัด (มหาชน)

SAKOL ENERGY PUBLIC COMPANY LIMITED

เลขทะเบียนบริษัทเลขที่ 0107559000443



## Policy and guideline on anti-corruption and bribery

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**Sakol Energy Public Company Limited**



## Anti-corruption and bribery

The company's ideology is the administration based on transparency and ethics by adhering to the governance and abiding by the relevant law of preventive and anti-corruption and bribery to the officers of government or private sectors. The company has prepared the policy and the guideline on anti-corruption and bribery. This **"anti-corruption policy"** has formed in order to clearly specify organizational structure; responsibility, work procedure, and chain of command in each sector. This is to counterbalance the authority, to have prudence in appropriate verification, and to be the clear approach for organizational administration and development to sustainability.

### 1. Definition on anti-corruption policy

Corruption is any form of bribery in promising to give or offer, demanding, or accepting money, properties, or any other inappropriate benefits with the officers of government or private sectors, any direct or indirect authorities for omission in order to maintain or recommend business to specific business or to acquire or maintain any other inappropriate business benefits, except for the consent law, guideline, announcement, local tradition or commercial custom.

### 2. Guideline on anti-corruption

- 2.1 The committee, executives, and the company officer are not allowed to conduct or accept any forms of direct or indirect corruption which covers all relevant businesses and sectors.
- 2.2 The company will manage a constant check, as well as, a review on the guideline and operation measure in conforming to the change of rules, regulations, and legal requirements.
- 2.3 The committee, executives, and the officers of all positions should not ignore any doubtful acts which are concerned to the corruption in the company. The supervisor or all concerned must be reported and cooperate in the investigation. If there's any questions, consult with supervisor or persons in concern.
- 2.4 The company gives fair treatment and protect the employees who deny or report the corruption in the company by applying the protection measure to the antis and the co-operative persons.
- 2.5 Any person who performs corruption is deemed to violate the company's regulation which needs to be inquired as determined by the company. Moreover, if that act is considered to be a guilt, legal punishment will be executed.



- 2.6 The company realizes the importance in educating and understanding other people who have to perform their duty, which is concerned or might affect the company, in following anti-corruption policy.
- 2.7 The company aims to build and maintain organizational culture which doesn't accept the corruption in the transactions with both government and private sectors.
- 2.8 The company doesn't have policy in demoting, punishing, or badly treating the employee who rejects corruption, despite the loss of business opportunities which might occur from those acts.

### 3. Operation measure.

- 3.1 This anti-corruption policy covers the process of human management; from recruiting, screening, promoting, training, employee's performance evaluating, and compensation payoff. It's determined that the commander of all levels must communicate and make understanding with the employees in order to apply it in business activities which are under their responsibility and ensure the efficient practice.
- 3.2 Receiving gift and welcoming party must be transparent, legal, and followed the regulations and relevant guideline of the company. A person of each position can receive gifts within the limited amounts, as the followings
- General officer: 5,000 Baht
  - Manager: 20,000 Baht
  - Committee: 50,000 Baht

### 4. Penalty of violation or omission of anti-corruption policy

- 4.1 If the committee violates or defies this policy, the company will appoint the commission of inquiry in order to promptly investigate the fact about that act. That commission will consist of all company's independent directors.

If there's an independent director who violates or defies this policy in any investigation, that director must not be part of the commission. If it can be proved that the director is the violator or doesn't abide by the policy, the commission of inquiry must appropriately consider the penalty from the evidence, fact, and environment in each case, and report the results, as well as consider the penalty (except the commission that violates or defies anti-corruption policy). However, if the violation or the omission is illegal, the penalty must be executed.





4.2 If the executives or the officers of the company violate or omit this policy, disciplinary penalty will be executed based on the facts and environment. If the violation or omission is illegal, the penalty must be executed.

4.3 The company uses all intra-communication systems in order to inform the penalty resulted from the omission of anti-corruption measure, as well as to clearly create awareness on the non-negative effect on the officer who rejects corruption, despite the loss of business opportunities which might occur from those acts.

4.4 The company creates awareness among general officers on the implementation of anti-corruption policy of one or more officers; such as the acknowledgement or reward etc.

#### 5. Issue clue or complaint

The company has formed the measure in issuing clue or complaint of any illegal and immoral acts, or any risk acts which signify corruption or wrong acts of the people in the organization, officers, and other interested persons. Those acts include, but not limit to, the preparation of wrong financial report, or the defective internal control system. The company has mechanism in protecting the informers to encourage the interested persons to cooperatively inspect the company's benefits more efficiently.

##### 5.1 The clues and complaints

- Dishonest acts or corruption which are illegal and violate the relevant company's regulations and guideline.
- The suspicious financial report or the deficient internal control system.
- The issue which affects the company's benefits or reputation.
- Other relevant issues

##### 5.2 Notification channel

The company's executives and officers or any other interested persons are allowed to contact the company's board in order to inform the clues or complaints of wrong acts or corruption via these following channels;

- **Post:** Define the clues and complaints of corruption on the letter head and send to "Sakol Energy Public Company Limited 15 Moo.1 Tumbon Chiangrak noi Amphoe Samkok, Pathumthani 12160"
- **E-mail:** Define e-mail subject of the corruption clues and complaints and send it to [thanapon\\_s@sakolenergy.com](mailto:thanapon_s@sakolenergy.com)
- **Phone:** Contact Human Resource Department 02-593-7217 ext. 203
- **Suggestion box:** Placed at the entrance of the office



### 5.3 Informer protection mechanism

To ensure the safety of the informers, the company pays attention to store clues and complaints confidentially. The complaint procedure and investigation have been explicitly determined. Those complaints will be acknowledged among persons in charge and all concerned only. If that information has been disclosed, the company will inquire and punish the person who unveils it.

## 6. The implementation by the company and all concerned

- 6.1 The company will inform and encourage the subsidiaries, associates, and other entitled companies (if any) to implement anti-corruption measure.
- 6.2 The officer must not hire business agency or middleman for the sake of corruption.
- 6.3 The company will ensure the fair and transparent purchasing and service, as well as the evaluation for strictly recruiting distributors, service providers, and contractors following the procurement regulations. Those distributors, service providers, and contractors will also be informed about anti-corruption policy of the company.
- 6.4 The company reserves the rights to terminate procurement and contract if the distributors, service providers, and contractors perform act of corruption or bribery.

## 7. The publication of anti-corruption policy

- 7.1 The company will post the announcement of anti-corruption in the obvious places.
- 7.2 The company will publicize anti-corruption policy via the company's communication channels; such as the company's website, intranet system or floppy dishes to notify public.

## 8. Risk assessment method

The company will constantly assess the risk from the act of corruption (at least once a year), as well as review the implemented risk management measure to be appropriate enough to control risk within the acceptable range. With risk assessment, the company can define the risk resulted from the corruption, the possible effects, the must-be-implemented measure, success indicators, and resources to be used for minimizing risk.

## 9. Data storage

- 9.1 The company has policy to follow the measure, principle, as well as the enforced laws about accounting and financial data reports.
- 9.2 All types of expenses must have referential documents and approval by authorization. Data storage must follow the relevant laws, regulations, and manuals.





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9.3 The company doesn't allow the record of any faulty or incomplete data record or window dressing. There must not be off-balance sheet which supports or covers up the inappropriate payment.

#### 10. Human resource management

The company will inclusively implement anti-corruption policy with human resource management procedure; from recruitment or selection of staff, promotion, training, staff's work-assessment, and compensation. The supervisor of all levels will have to make understanding with the subordinates of their control to ensure the effective implementation.

#### 11. Training and communication

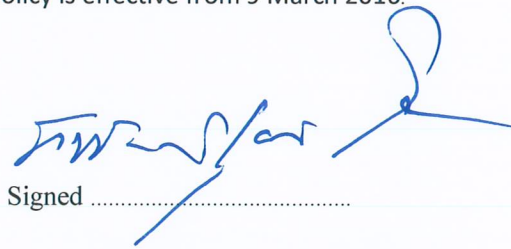
##### 11.1 Board of management and the executives

Board of director, executive committee, and management must be the role model to perform against the corruption and have the role in supporting anti-corruption policy in order to communicate to staff and all concerned. They must review the appropriateness of the policies and measures to be correspond to the change of business, regulations, rules, and laws.

This anti-corruption and bribery policy is effective from 9 March 2016.



บริษัท สากล เอนเนอจี้ จำกัด (มหาชน)  
SAKOL ENERGY PUBLIC COMPANY LIMITED

  
Signed .....

(Mr.Chatchai Sumetchotemetha)

Presidents of the Board of Directors

Sakol Energy Public Company Limited