



## Golden Lime Public Company Limited

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Fraud and supply chain corruption Risk assessment		Scan the QR and change to EN  for EN version

To monitor and ensure compliance with the Anti-Corruption Policy, beside the assigned persons specified in the No.4 of the Policy, the Board of Directors prescribes the anti-corruption as the duty and responsibility included in the business ethics requiring directors and all executives and employees shall acknowledge, understand, and comply with the policy and the code of conduct as defined in the business ethics and its policy by not doing anything that is illegal and contrary to good ethics. To prevent any form of corruption, the preventive measures are as follows.

**Fraud risk are 2 categorized into 2 types;**

- **Risk from internal corruption**  
Caused by personnel using public office for private unlawful gain; folks and families by misappropriating the company's assets, document forgery, embezzlement, accepting bribes, inappropriate gifts, double-dealing, etc.
- **Risk from external corruption**  
Caused by persons outside the organization but impacted the company, such as false cheques, fake financial documents, fraud, etc.

## 1. Definitions for mutual understanding of corruption.

### Acts classified as fraud

as a guideline for risk assessment, acts are classified as fraud, for example

- > Dishonest conduct or intentions to commit fraud
- > Misuse of company assets for the benefit of oneself or others
- > Misappropriation or theft of company property
- > Deliberate misrepresentation or concealment of information
- > Deliberately misreporting financial information or financial transactions.
- > Editing of accounting numbers, such as fake receipts, concealing debts or expenses, etc.
- > Falsifying Documents, changing non-financial reports such as changing data, employee qualifications, altering internal documents or modifying disclosed documents with the intention of misleading a person or company for reputation damage to the company or the relevant
- > Disclosure of information that is considered confidential or trade secrets of the Company to third parties
- > Seeking, soliciting or accepting valuable deal or gifts from business associates
- > Offering valuable gifts to officials, government agencies, or acting in an unlawful practice

The above examples are partial. In case any employee finds any activity suspicious or fraudulent, he/she can contact below unit.

- Supervisor, manager or top management according to the chain of command
- Accounting and Finance Department or Human Resources Department or management
- Audit Committee

## 2. Elements of corruption

4 elements of Corruption

### (1) Motive

A corrupt person may be an employee or outsider who may be dissatisfied with the organization or have financial problems, influenced by debts to commit fraud.

### (2) Attraction

Profit and/or benefit attract corrupt people to commit fraud as they desire such gain despite of illegal gain.

**(3) Opportunity**

Opportunity means the likelihood or opportunity that a corrupt person can commit a fraud. Preventive control such as an internal controls system can helpfully reduce such opportunity especially with those dealing with cash.

**(4) Concealment**

The fraudster or perpetrator is to manipulate or hide his dishonest acts differently from explicit stealing or hijacking.

**3. Forms of fraud and preventive measures**

<b>Examples of corruption patterns</b> <b>Fraud and corruption risks assessment in the value chain</b>						
<b>1</b>	<b>2</b>	<b>3</b>	<b>4</b>	<b>5</b>	<b>6</b>	<b>7</b>
Raw material supply or sourcing	Industrial And Production Management	Quality Control & Assurance	Storage & Packing	Outbound Logistics	Services or Sales and Marketing	Customer Use
<b>1) Procurement, sourcing, hiring</b>						
<ul style="list-style-type: none"> <li>- Asking for private gain or benefit from seller or service provider by consenting to the seller or service provider conspiring to offer a price that is higher than the market price, or the average price, or too much expensive; or</li> <li>- Authorized person seeking forbidden private benefits from the contractor/service provider by contracting them regardless of the company procurement system steps in the procurement</li> <li>- Procurement of products / raw materials that do not meet requirements or order more than the amount required for demanding or obtaining benefits but the company has to pay more or higher</li> </ul>						
<b>2) Contract / Sub-contractors Outsourcing</b>						
<ul style="list-style-type: none"> <li>- Hiring unqualified subcontractors who lack skills or expertise not suitable for the job by requesting money or other benefits from sub-contractors with such low quality.</li> <li>- Allowing higher wages, reimbursements of wages than actual performance causing more expense and damage to the company</li> </ul>						
<b>3) Sales fraud</b>						
<ul style="list-style-type: none"> <li>- Deliberately mis-invoicing as pre-approving the sale of goods to create fake sales for incentives or commissions then cancelling such invoices</li> </ul>						
<b>4) Bidding</b>						
<ul style="list-style-type: none"> <li>- Bidding with government agencies or private agencies with offering bribes to government officials/employees, government agencies/private agencies so that the company wins the bidding or shortcut the process</li> </ul>						
<b>5) Mutual benefits between companies and government officials / employees Government agencies / government employees</b>						
<ul style="list-style-type: none"> <li>- offering or providing benefits, directly or indirectly, to a government official for the purpose of influencing official action or inaction, inducing an unlawful act, or to secure an improper advantage.</li> </ul>						
<b>6) Provide compensation in various forms</b>						
<ul style="list-style-type: none"> <li>- to contractors / subcontractors or agents / brokers beyond the agreement of the company as sharing such extra compensation with the contractor / sub-contractor or that agent/broker</li> </ul>						
<b>7) Fraudulent sales of scrap or idle assets</b>						
<ul style="list-style-type: none"> <li>- Authorized persons or related persons request benefits in return from buyers or use inside information in auctions to offer lower or higher prices.</li> </ul>						

<b>8) Cash fraud</b>
- Cash is the most liquid asset because it is used for buying and selling goods and services instantly without losing its own value unlikely to other assets. However, the company prescribes selling products and any scrap by means of payment to a bank account in the name of the company only.
<b>9) Material or asset corruption</b>
- take high-value materials or assets from the storage due to their high price
<b>10) Travel expenses fraud</b>
- Forgery of travel orders and invoices for reimbursement, even though there is no actual travel or making a list of expenses higher than the amount actually paid

#### 4. Fraud Risk Assessment Duty

Personnel at all levels of the Company and its subsidiaries must comply with business ethics and work practices and are responsible for assessing fraud risks including reviewing fraud risks in each process that may occur. The fraud risk assessment review shall be done at least every 2 years.

#### 5. Fraud Risk Assessment

Fraud Risk Assessment is considered preventing corruption in the organization in 4 steps as follows:

**Step 1:** To determine the risk impact and the likelihood of occurrence, the acceptable risk level (Risk Appetite).

**Step 2:** To Identify fraud risks, cause, impact, severity, likelihood then internal control measures.

**Step 3:** To assess existing internal control systems, the severity, and likelihood after the risk treatment to ensure efficient risk mitigation to an acceptable level.

**Step 4:** To establish risk mitigation measures to an acceptable level for the organization in the case that the current internal control measures are insufficient to prevent fraud risks

#### 6. Risk Assessment Criteria

Assessing the severity of the risk by evaluating that each factor How much is likely to happen? And if it happens, how severe will it affect the organization? By evaluating the likelihood of the likelihood of occurring ( Likelihood Score ) and the level of impact ( Impact Score ) by taking all the identified risks into consideration in order to prioritize the risks and the risk assessment is divided into 2 dimensions:

- (1) **Likelihood / frequency of occurrence ( Likelihood : L )** means the probability of one (or more) event(s) in a given time frame

**Table 1 : Opportunity/Frequency Criteria**

Level	Probability / Frequency	Probability or Likelihood			
		frequency	Probability	Likelihood	Estimated from the status of actual events.
5	Severe	1 - 3 months	More than 80 %	Very Likely	The incident has been reported and is currently under investigation.
4	High	4 - 6 months	70 % - 80 %	likely	Incidents under management
3	Moderate	7 - 9 months	60 - 69 %	Possible	incident managed
2	Minor	10 - 12 months	50 % - 59 %	Unlikely	The exact cause of the incident is being resolved.
1	Possibly	More than 12 months	less than 50%	Very Unlikely	The exact cause of the incident has been resolved. (Lower chance of recurrence)

( 2 ) **Impact level ( Impact : 1 )** mean the violence caused by the incident or predict that that event will occur and when it occurs, there will be an impact Severity rated into 1-5 and the damage caused by risk **factors in various aspects** by considering how serious it is , as the following table

**Table 2-1 Financial Impact**

Level Rating	Effect/ Impact	Financial Impact Consideration Criteria	
		Impact on EBIDA targets	Effect the cost
5	Severe	More than 10% of EBIDA	from 5,000,000 baht or more
4	High	5.01-10 % of EBIDA	1,000,000 – 4,999,999 baht
3	Moderate	1.01-5% of EBIDA	750 ,000 - 999,999 baht
2	Minor	0.51-1% of EBIDA	500,000 - 750,000 baht
1	Possibly	Less than or equal to 0.5% of EBIDA	Less than 500,000 baht

**Table 2-2 Operational impact**

Level Rating	Effect/ Impact	Consideration Criteria on Operation/Operation Impact	
		The effect causes the process to halt.	Impact on the progress of the project
5	Severe	Business interruption more than 1 month	delay more than 20% of the plan
4	High	Business interruption about 1 month	delay 15-20 % of the plan
3	Moderate	Business interruption for several weeks or significant disruption	delay 10% - 15% of the plan
2	Minor	Partial impact less than 1 month or low impact on an operational process	delay 5% - 10% of the plan
1	Possibly	Not measurable (Negligible impact) or no interruption in the process.	delay less than 5%

**Table 2-3 laws / rules / regulations impact**

Level Rating	Effect/ Impact	Criteria	
		non-compliance /negligence	impact
5	Severe	suspend business license arising of legal disputes	criminal prosecution / prosecution against organization claims for damages and/or suspension of any transaction other
4	High	loss, penalty, surcharge or an expenditure budget of more than 10 million baht.	internal investigation, expelled / to prosecute a right or a claim, pay fines
3	Moderate	Implementation is not standard controlled. but can fix	Not a serious offense warning or parole / prosecution against legal organizations
2	Minor	expenses exceeding 3 million baht incurred in order to meet regulations, requirements, laws or obligations.	internal investigation / a lawsuit enforced to comply with the law.
1	Possibly	less than 1 million baht	Non-significant impact

**Table 2-4 Impact on customers / partners / business partners**

Level Rating	Effect/ Impact	Criteria	
		risks or impacts	Satisfaction based
5	Severe	key customers loss, interrupted demand growth.	Dissatisfaction, complaints
4	High	Loss or damaged relationship with key customers, significant cost occurred, interrupted demand growth.	Dissatisfaction, discontinue purchasing, no repetitive purchasing
3	Moderate	Loss or impact to relations, moderate costs occurred	negative comments on products or services or the company's processes.
2	Minor	Very low impact on customer relationships some costs occurred	don't understand and dissatisfied with the quality of the product or the quality of the service provided by the company
1	Possibly	Very few complaints, no cost impact	inconvenient product or services

**Table 2-5 Reputation/ corporate image**

Level Rating	Effect/ Impact	Criteria for consideration of impacts in name of risk / corporate image
5	Severe	a derogatory or negative news on local and global media, social media, electronic media
4	High	a derogatory or negative news on local media
3	Moderate	Negative news through local media but rectified within 1-3 days
2	Minor	local reputation or stakeholders but not released to the media
1	Possibly	controversial but not go to the public

### Prioritizes risks

After evaluating the likelihood of occurrence (Likelihood Score) and impact score of various risk factors, the organization should calculate the level of risk (Risk Exposure) to classify the severity of the risk (Degree of Risk) to be a basis for considering the measures to respond to various risks. The calculation is the multiplication of the likelihood and the impact level.

**Table 3 Degree of Risk matrix**

Likelihood	Impact				
	1	2	3	4	5

5	5 (5x1)	10 (5x2)	15 (5x3)	20 (5x4)	25 (5x5)
4	4 (4x1)	8 (4x2)	12 (4x3)	16 (4x4)	20 (4x5)
3	3 (3x1)	6 (3x2)	9 (3x3)	12 (3x4)	15 (3x5)
2	2 (2x1)	4 (2x2)	6 (2x3)	8 (2x4)	10 (2x5)
1	1 (1x1)	2 (1x2)	3 (1x3)	4 (1x4)	5 (1x5)
<b>Degree of Risk (D) = Likelihood (L) x Impact (I)</b>					

**Risk: D)**

Likelihood multiplied by the level of impact (Impact) , which has 3 levels of risk, namely, low, medium and high, with

level of risk severity = (Probability of events) x (Effects of events)

**Table 4 Level of risk severity (Degree of Risk)**

Level Rating	Level Score	Effect/ Impact	Meaning
Severe	16-25	(red)	unacceptable level of risk /Immediate risk mitigation to an acceptable level due to its impact on business operations such as finance, performance, stakeholders or sustainable business operations
High	9-15	(orange)	unacceptable level of risk but probable / risk mitigation to an acceptable level in a given period of time due to its highly likability and impact on most of the business operations.
Moderate	5-8	(yellow)	acceptable level of risk/ controlled measures shall be taken to prevent the risk to elevate to a higher level as it may happen sometimes in business.
Minor	3-4	(green)	acceptable level of risk/ Low chance of occurrence /controlled measures taken to manage
Possibly	1-2	(White)	Low chance of occurrence / acceptable level of risk / acceptable risk level without risk control or additional measures

High-risk activities shall be controlled as corporate risks. Activities associated with medium and low risk can be controlled and mitigated at a departmental level by reporting to the departmental chief and then reporting risk to the Managing Director or Executive Committee to ensure no higher elevating. Risk exceeding level 9 will be upgraded to corporate risk which responsible shall conduct formal risk mitigation and control to report to the managing director or the Risk Management Committee (RMC), respectively.

**7. Key risk indicators**

There are probably several indicators depending on the cause of risks to measure activities that may associate with risk.

**A. Key Risk Indicators: KRI**

KRI acts as Early Warning Sign. Good indicator has a Predictable Power to develop as a Leading Indicator to find a way to reduce the chance of occurrence ( Lagging Indicator) to find ways to adjust the risk action and control indicators ( Control Indicator) to reduce the impact and damage that will affect to the organization.

**B. Key Performance Parameter: KPP**

KPP is the rating of risk after treatment according to key risk indicators ( Key Risk Indicator: KRI), divided into 3 levels:

- **Acceptable - green**

Operations are back to normal situation no probable risk occurred in such area

- **Trigger - yellow**

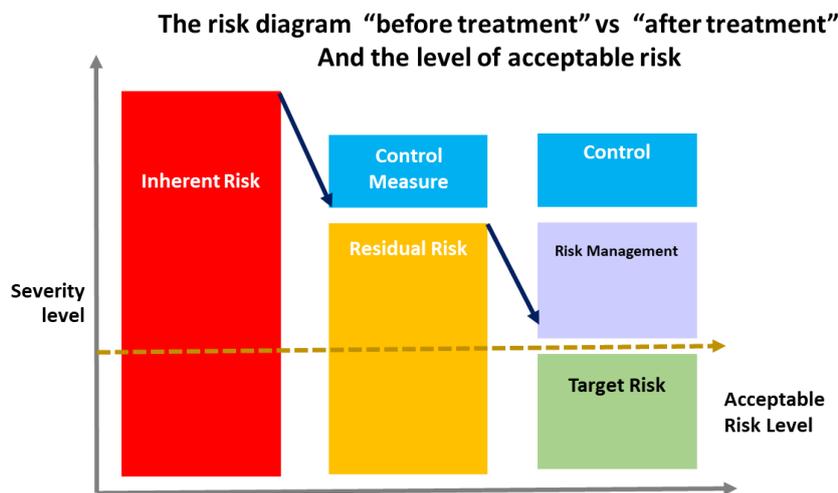
It is a signal of possible danger or a risk of achieving the organization's objectives in that matter. It is necessary to do something or modify operational strategies to manage those risks.

▪ **Risk - red**

Operation is not in line with the goals and plans greatly. Special attention must be paid to addressing existing problems and obstacles or changing strategies and methods to reduce the impact and the damage that will occur.

**8.Implements Risk Responses**

**Risk Management (Risk Mitigation or Risk Treatment)** Measures are taken to prevent the likelihood of risks and mitigate damage from incidents that may occur. A risk management plan is the selection of appropriate strategies to manage each aspect of the risk that the organization is facing. The risk management plan will be presented to the Risk Management Committee (RMC) meeting for consideration and approval of the allocation of resources required by selecting strategies and the most appropriate risk management approach to consider Risk Tolerance and the cost incurred compared with benefits, legal and other requirements as well as the responsibility to society and all groups of stakeholders.



**2. Risk Management Strategies**

**1 Accepting the risk ( Accept)** is to accept the risks arising from operations and organizational decision making. Sometimes businesses choose to accept risks and not spend any resources on avoiding them. The Company might decide to accept a level of risk as benefits of taking the risk greatly outweighs the possible damage.

The cost of treatment is much higher than the potential results of the risk.

**2. Risk reduction (Reduce)** is to take some action to reduce the likelihood of a risk or mitigate the impact and damage on the organization to an acceptable level

**3 Risk avoidance ( Avoid)** is a cancellation or avoid doing certain activities that may lead to risks that will affect and damage to the organization

**4 Risk Transfer ( Sharing / Transfer)** is a partial or all-risk transferred to other agencies

**5 Diversification** by implementing multiple options to reduce the risk in the event that one of the options fails.

**Factors in determining risk management strategies** are as follows:

**- Assessment of impacts and opportunities based on the implementation of risk management strategies.**

To assess each risk management strategy, management must understand that risk management activities that may result in different effects and likelihood of risks, for example:

Hedging exchange rates in advance is an activity that can reduce the impact of exchange rate fluctuations but not be able to reduce the chance of exchange rate fluctuations.

On the other hand, purchasing more from locals can reduce the chances of foreign exchange rate impact but not reduce the impact that may occur etc.

An assessment of the impact and likelihood of risks may change before deciding on choosing a strategy, so that the risk level is in line with the acceptable risk level of the company

**- Assessment of costs and returns of implementing a risk management strategy.**

Since the company's resources are limited, it is necessary to assess the costs and returns generally incurred. Costs can then be quantitatively calculated by calculating direct and indirect costs. Costs can also be viewed in terms of time and resources needed to perform such risk management strategies. For the sake of returns, other advantages can be included in achieving the relevant objectives.

In case that performing any risk, management activity is not worth the cost , executives may consider to transfer such risks (Sharing) in order to share costs with external agencies such as insurance or joint ventures, etc. executives may choose just one method or a combination of several methods to manage the risk to the desired level.

**10. Risk treatment Plan**

To predetermine how to choose a strategy to deal with potential risks by specifying which action, how, when, who. Risk management methods include:

**1 Risk Acceptance** It is acceptable to have a certain level of risk due to the cost of risk management or risk control may cost more than its outcome. But there should be monitoring and supervisory such as determining the acceptable level of impact, preparing a risk management plan, etc.

**2 Risk Reduction / Control** is to improve the work system or redesign to reduce the chance of occurrence or reduce the impact to an acceptable level such as installing safety equipment, training to develop skills for the operators ,setting proactive measures in various matters, etc.

**3 Risk Diversification** takes relevant corporate assets, sources of income, service providers, raw material sellers types of products sold, markets, customer groups, etc., into consideration to reduce risks associated with over-reliance on income, service providers, return on investment from any one source, etc.

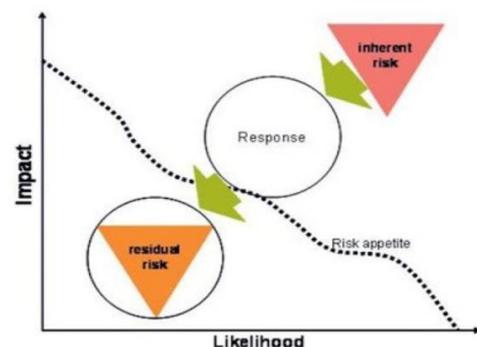
**4 Risk Sharing / Risk Transfer** reduces potential large losses, such as insuring property to transfer some of the risk to an insurance company, outsourcing suppliers to do some work instead, warranty from sellers such as machinery, electrical equipment, computers installed in corporate projects, etc.

**5 Risk Avoidance** Stopping or changing events associated with risk such as refraining from risky but unnecessary steps and , modification and reduce the scope of operations, etc.

**11. Evaluation of Residual Risk** means a risk assessment and management of the Inherent Risk and acknowledges some Treated Risks that can be controlled by risk control measures and acknowledges other remaining risks ( Residual Risk) that shall be addressed and opened for monitoring.

The Residual Risk assessment is for the Risk Management Committee (RMC), executives and related persons to aware and understand that the organization may not be able to control or eliminate 100% of all risks. Despite of excellent control measures, there is always a residual risk. Any decision must always be made with awareness and understanding of the this.

**12. Control activities** are policies and procedures established to help management ensure that risks are managed effectively. As each organization has its own objectives and implementation techniques, the control activities are different. Controls reflect the organization's internal environment, nature of business, structure and culture of the organization. if the



information technology involves the operation, the general control of the information technology system and particular controls for each system should be in place.

**Type of control activity**

**1) Preventive control** A pre -arranged process or control to reduce the likelihood of adverse outcomes/impacts, e.g.

- segregation of duties
- granting password
- training

**2) Detective control** is a process or control to identify root cause of error or abnormality that occurs , such as

- Review Report
- Confirmation
- Asset data
- Bug report

**3)Corrective control** to remedy the damage or reduce damage caused by mistakes or irregularities such as account reconciliation

**4) Directive control** is An action or control that promotes or encourages the achievement of a desired objective, such as rewarding good performers. Control activities ensure that risk management activities are carried out in an appropriate and timely manner. In some cases, one control activity may be associated with a number of opposite risk management activities. One risk management activity may involve multiple control activities, and in some risk management strategies, a control activity may be the same activity.

Control activities for information technology systems can be grouped into two categories:

- general control and
- system-specific controls cover information technology infrastructure and management; IT security, procurement of ready-made programs, program development, and maintenance. System-specific controls are designed to ensure the integrity of the data that is recorded and processed correctly and tangibly.

Control activities are important for management in achieving the company's objectives as per its particular set of objectives and their techniques are company-specific; therefore, control activities differ. Controls reflect the environment, nature of business, internal structure, company history and culture.



Golden Lime Public Company Limited Fraud and corruption risk assessment within SUTHA 's business chain process			Like li hood (L)	Impact /*(Average only for risk)					Ave. (I)/*	Severity Level ( Lx I ) Rounded up	Responsible /Relevant unit		Doc#CS20220801_Form
Item	Event	Risk		Operation	Finance	Regulations	Customers/ partners	Reputation			external	internal	Preventive and control measures
			Risk Assessment date 16 May 2023										
1. License													
1.1	- to apply for Factory License(Ror.Ror. 4) Renewal	- authority representative asks for compensation or other benefits for - expedite the process - complete renewal before the license expires - certify the audit as required by law.	2	2	2	3	3	2	2.4	5 moderate	Provincial industrials office Lopburi / Saraburi	Plant admin (Ms.Panadda)	Ror.Ror.4 - Pay Yearly fee annually - Renew every 5 years - Master List to monitor license expiry date - budget allocation for each requirements
1.2	- to build a building or building extension	- to bring up an offense in case of non-compliance with the requirements; and -to issue a license within the deadline	1	2	2	3	2	1	2.0	2 Very low	Municipality/Subdis trict Administrative office in the area where the establishment is located (Mechanic Division)	Plant admin (Ms.Panadda)	- a written workflow to apply for a permission - an operational plan by the plant management to renewal license as per the annual budget allocation on related factory licenses
1.3	- Apply for or renew an annual building inspection license		2	2	2	3	2	1	2.0	4	Local Municipality/Subdis trict Administration (Mechanic Division)	Plant admin (Ms.Panadda)	
1.4	- Apply for or extend a license to operate a		2	2	1	3	3	2	2.2	4	Local Municipality/Subdis trict Administration	Plant admin (Ms.Panadda)	

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	business that is harmful to health										(Mechanic Division)		
1.5	- Applying for or renewing a trademark		1	1	0	1	0	1	1.0	1	Department of Intellectual Property	Office admin (Ms..Kannika)	
1.6	- Application for or renewal of a limestone concession certificate		1	5	5	3	2	1	3.2	3	Independent consulting firm	Thai Marble Co., Ltd. (Subsidiary) managed by a contractor	
2.	<b>Sales and Marketing</b>												
2.1	- project bidding; or auction or Selling scrap metal, scrap, unused goods	- unlawful advantages ; illegal rebates, bribes, kickbacks and under-the-table payments.	5	1	1	1	1	3	1.4	7 Moderate (KRI) Sales volume and average price	customers either government or private sectors	Procurement, Production, Finance Dept. (Ms.Amornpan)	- auction every 3 months - guarantee deposit payment - at least 2 executives or management level from at least 2 departments are required to approve all transaction
2.2	- Contracting	- Determining terms and conditions in favor for the benefit of the company ; payment , delivery	5	2	3	4	2	3	2.8	14 High (KRI) number of delayed contracts or non-compliance	customers either government or private sectors	buyers / purchaser / accountant corporately asses	- Code of Business Ethics - Anti-Corruption Policy - Whistleblowing Policy - Review and assessment of fraud risks - For various contracts, there is a template or a standard draft of a contract for guidance to be used in various cases. The draft has been reviewed by legal experts to assess both the completeness under the relevant laws and the best interests of the company to be used as a standard draft.
2.3	- Job inspection	- collusion under imperfect / noncompliance result	5	5	5	3	3	3	3.8	19 Very High (KRI) number of noncompliance			

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			Risk Assessment date 16 May 2023											
									compared to averaged delays			- In the case of an important contract, the draft will be submitted to a legal advisor to review the conditions and contractual obligations to cover in order to reduce risks and maximize benefits to the Company		
2.4	- Approval of adding or removing the delivered work	- Approval is false, unreal	3	1	3	2	2	2	2.0	6 Moderate				
<b>3. Procurement / sourcing / hiring</b>														
3.1.1	- Buyers / sourcing goods and raw materials	- accept offers of gifts, benefits or hospitality from those who submit bids that vary significantly from others or choose a supplier whose bid was well above the expected cost/favor a quick procurement over following proper process	3	2	1	2	2	2	1.8	5 Moderate	customers either government or private sectors	Procurement (Ms.Natchanok)	- Business Ethics / Procurement Code of conduct - Internal guideline and control for each serial process; receiving raw materials, production, delivery with a clear authority between the requester, the approver, and the bookkeeper via Win speed program - Accounting system and internal controls, separated process between vendors and money collector including payment evidence	
3.1.2														
3.1.3		- choose a supplier whose bid was well above the expected cost/non- compliant product or	1	2	1	1	2	2	1.6	2 Very Low				

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		raising purchase orders after receiving invoices											
		- unusually higher price offer in order for price gap benefit	1	2	1	1	2	2	1.6	2 low			
3.2	- Sourcing Contractors, Subcontractors - Outsourcing such as transportation or trucks services to deliver goods, etc.	- Authorized personnel seeks unlawful benefits for themselves or others from contractors/service providers by allowing them to work aside the process of procurement.	4	1	3	2	2	2	2.0	8 moderate	Private sectors contractors	Logistics Dept. and planning (Ms.Natchanok)	- Selection criterion and process for sourcing suppliers - Procurement flow ; price comparison, bidding
3.3	Application for investment promotion certificates (pre-start and operation)	- Offer benefits to responsible staff to speed up the promotion certificate approval process	2	3	1	2	2	2	2.0	4 น้อย	BOI	Plant Admin (Ms.Pannada) or outsource	- workflow of BOI application - Submit online to BOI
3.4	- Import of all machinery permitted for use in the promoted project	- Offer benefits to responsible staff to expedite customs procedures or formalities to	1	3	2	2	0	1	2.0	2 Very low	customs / BOI	selected contractors or outsourced agent work with (Mr. Ekkawat)	- procedures in import - Compliant to Customs Acts, Royal Decree on Tariffs customs regulations - but in force majeure if imported



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			Risk Assessment date 16 May 2023										
		shorten the time , pay less											
3.5	- Exemption or reduction of import duty for machinery	- Offer benefits to officials by asking for approval to import machinery or equipment speedily or high taxed imports to pay less tax	1	3	2	2	0	1	2.0	2 Very low	customs / BOI	and financial accounting department)	The product has arrived. It turns out that problems of discretion Interpretation of customs officials does not match what the company declares Arrested should not bribe. for the staff to direct convenient to follow regulations or laws Correct, for example, if the coordinates are entered incorrectly have to pay more taxes pay additional taxes, or If a license is required to be attached have to apply for a permit from relevant agencies provided correct etc.
3.6	- Import of goods	A bribery to release the goods. or certain types of raw materials that require particular clarification or permission, or prohibited goods or make a false statement or hiding the actual tax rate or declare a lower price for the benefit of invalid tax deductions etc.	1	3	2	2	0	1	2.0	2 Very Low	Customs	Finance Accounting / procurement and Mr. Ekkawat	
3.7	- export/export of goods	- Personnel offering bribes	1	1	2	1	0	1	1.3	1 Very low	Customs	Export personnel	- procedures in export sales

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Item	Event	Risk		Operation	Finance	Regulations	Customers/ partners	Reputation			external	internal	Preventive and control measures
													Risk Assessment date 16 May 2023
		or other benefits to officials to expedite the goods from the port faster than usual, or the declaration of false items that mismatch imported goods or declarations - Sales or export officials try to underestimate the import tax of the destination country through DAP										cooperate with external expert (Mr.Eakawat)	- hiring external expert in international shipping - HS Codes of the company for assignment and verification
4.	Product delivery												
	- Delivery of goods to customers	- Violating traffic rules for driving at a speed beyond the law, overloading, and bribing, unqualified personnel bribes for any offense ,logistics queue-jumping for high-priced goods in particular.	3	1	1	4	1	1	1.6	5 Moderate	External Supplier	Logistics (Ms.Pannarat)	- work procedure - monitor car condition, driver and goods before leaving to deliver goods - effective management of queue in different locations using GPS as a medium

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											external	internal	Risk Assessment date 16 May 2023
5. Screening and employment													
5.1	- Training courses submission to Labor dept.	- A bribery for non-compliance	1	1	1	1	1	1	1.0	1 Very low	Provincial Skill Development Center	Human resources Dept. (Ms.Ponsuree/ Ms.Parichat)	- Annual work plan - work procedure - training courses provided at no cost by Association of Listed Companies. , the Office of the Securities and Exchange Commission and the Stock Exchange of Thailand including free online training courses
5.2	- Hiring people with disabilities	- A bribery for non-compliance	1	1	1	1	1	1	1.0	1 Very low	Office of Social Development and Human Security		
5.3	- monthly payment of contribution and addition	- a bribery for noncompliance to Social Security Act BE 2533 1990	1	1	1	1	1	1	1.0	1 Very low	Social Security office	Human resources Dept.	- Monitor and control payroll over the Thai soft program
5.4	- Annual health check	- A bribery for noncompliance in pre-employment health check-ups and annual health check-ups according to the regulations of the Ministry of Labor	1	1	1	1	1	1	1.0	1 Very low	Hospitals	(Ms.Ponsuree/ Ms.Parichat)	- Annual plan and procedure - Annual budget allocation for health checkups program according to age and gender
5.5	- Hiring expats - Visa application / Renewal - Work permit application/Renewal - Notification of staying in the	- A bribery for non-compliance with immigration law / labor law	1	1	1	2	0	2	1.5	2 Very low	- Immigration Bureau  - Provincial labor office	HR Dept. Ms.Kannika/Ms .Panchalee	- Master plan to monitor application and renewal - Visa and work permit process - Annual plan for Visa and work permit - back up documents

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			Risk Assessment date 16 May 2023										
	Kingdom over 90 days										- Visa One Stop Service (BOI)		
6.	Environmental control												
6.1	- A permit to remove sewage or non-hazardous materials for disposal such as rags/paper/contaminated containers, or waste lubricating oil, etc.	- A bribe offer to bureaucrats who issue permits	2	1	1	2	1	2	1.4	3 Low	Office of Industrial Waste Management ,Local authorities, and private contractors who have a waste carriers license	Plant Admin (Ms.Jetsita) /	- procedures to monitor data input while issuing invoices of hazardous waste shipment
6.2	- A permit to remove sewage or unused material that is not hazardous waste for disposal such as scrap metal, scrap wood etc.	- a supplier may pay or accept a bribe in connection with such scrap materials or personnel paying a bribe for not complying with relevant applicable laws and regulations	2	1	1	2	1	2	1.4	3 Low			
6.3	- Environmental and safety report such as - Effluent Analysis - dust and contaminated air	- Personnel wrongfully offering to give bribes or other benefits to the officer	2	1	1	3	2	1	1.6	3 Low			

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			Risk Assessment date 16 May 2023										
	- noise detection - crane works - electrical equipment - safety electrical system - health check-up - risk from work - building inspection control and signage	in case of non-compliance with the requirements										audit by URS for various ISO standards for environment, safety and energy	
7.	Taxation process												
7.1	tax refund - VAT refund	- Personnel offering or accepting bribes or other benefits to claim tax refunds by forging the account, tax report, sales tax, filing P.P. 30 form incorrectly	1	0	3	0	0	0	3.0	3 Low	revenue department & local revenue office	Accounting (Mr.Thaninthorn)	- segregation of duties according to the internal control process - monitoring system on tax reports, sales tax, and original documents - a review of the report.
7.2	tax payment - property and land tax, signboard tax, and local maintenance tax	- Paying bribes to reduce taxes or not to pay tax	2	3	3	2	2	2	2.4	5 Moderate	municipality SAO	Plant Admin (Ms.Panadda)	- Yearly plan for annual payment