



Golden Lime Public Company Limited

Latest Policy published on the Company's website	QR code to download	
<h2>Anti-Corruption Policy</h2>		<p>Scan the QR and change to EN  to download EN version</p>

Golden Lime Public Company Limited (“The Company”) aims to drive business with good governance and transparent management and to comply with good corporate governance principles; measures and guidelines for communicating with personnel within the organization and outside stakeholders have been established to ensure and enhance transparent good governance.

1. Purpose

1. To formulate policies and frameworks to prevent fraud and corruption including establishing measures or manuals for managing fraud risk in writing.
2. To be compliant with the new **Section 176 of the Organic Act on Anti-Corruption, B.E. 2561 (2018)** that imposed penalties for individuals and juristic persons who do not yet have appropriate internal control measures to prevent fraud and corruption. To set a framework and risk management to prevent fraud and corruption in the work process, therefore, is necessary for juristic persons in designing internal measures to prevent bribery fraud and corruption within an organization.

“SECTION 176 ”

Any person who gives, offers to give, or promises to give any property or benefit to a public official, foreign public official, official of a public international organization with an intent to induce such person to wrongfully perform, not perform or delay the performance of any duty in his or her office shall be liable to an imprisonment for a term of not exceeding five years or a fine of not exceeding one hundred thousand Baht or to both.

In case the offender under paragraph one is a person associated with any juristic person and the action was taken for the benefit of such juristic person, provided that such juristic person does not have in place appropriate internal control measures to prevent the commission of such offence, the juristic person shall be deemed to have committed the offence under this Section and shall be liable to a fine of one to two times of the damages caused or benefits received.

The juristic person under paragraph two shall mean juristic person established under Thai laws and juristic person established under the foreign laws which operates business in Thailand.

A person associated with a juristic person under paragraph two shall mean a representative, employee, agent, affiliated company, or any person acting for or on behalf of such juristic person, regardless of whether having the power or authority to take such action.

3. To determine the scope of action and specify the duties and responsibilities for personnel in order to acknowledge and implement to prevent, investigate and enact to corruption risks.
- 4) To define guidelines for personnel in each unit on preventive measures, and inspection to implement accurately and in a timely manner when there is any suspicious act related to corruption.

2. Scope

This policy, the scope of duties, responsibilities, and guidelines are outlined to cover all practices pertaining to the committee, sub-committees, executives, any sub-committees appointed by the executives, working panels, and personnel both in the Company and its subsidiaries as well as the stakeholders and to communicate for all to acknowledge measures to prevent and combat fraud and corruption within the organization and other relevant units.

3. Anti-Corruption Policy

The Company participated with the Office of the National Anti-Corruption Commission as a pilot company in the evaluation project of the morality and transparency of operations of private-sector agencies and no complaints were found regarding corruption from stakeholders.

The Board of Directors' policy aims to comply with the laws and set guidelines to ensure compliance with anti-corruption policies continuously. The Company is committed to support and supervise its executive, employees, agents, partners, and contractors to be aware of potential corruption and anti-corruption policies by showing its leadership in being anti-corruption. As the Company is a member of Partnership against Corruption for Thailand (PACT Network), it thus acts within the scope of definitions given by the Company as follows:



Fraud and corruption include any act for unlawful advantage and any practice or omission of duty and/or abuse of power, violations of law, ethics, regulations or policy of the Company in order to secure any form of unlawful advantage such as soliciting, receiving, offering, or giving cash or any property including cash, goods or other favors, as well as any other benefits, to government officials or individuals who engaged in doing business with the Company for the benefit of the Company, and include:

Political contributions refer to financial aid or otherwise in order to support political activities such as money lending, personnel support, providing goods or services, advertising to promote or support the political parties, buying tickets for raising funds or donating money to an organization with close ties to political parties, and so on. The anti-corruption model with;

Asset Misappropriation means the theft of an entity's assets and also involves the misuse of assets, non-cash assets, causing the Company to lose assets, opportunities or any benefits or when an individual or individuals intentionally withhold an asset or assets to use for their own means.

Fraudulent Financial Reporting includes making corrections to financial reports such as financial statements, financial records or non-financial reports to conceal embezzlement or improper actions for benefits of oneself/or others and as a result, the company's reports are inaccurate.

Bribery & Corruption includes offering or accepting things, gifts, rewards or other forms of compensation in order to persuade that person to make a decision or act or refrain from doing something for someone's benefit to achieve their wishes in dishonest, unlawful or unethical manners against the Company

Giving gifts or any other benefits mean offering bribes or offering favors in various forms such as cash, property, things, gifts, hospitality, or any other benefits as a reward, as an incentive, as a reward to build a good relationship that falls within the scope of corruption, such as nepotism, giving inside information or wrongful assistance, collusion.

Conflict of Interest occurs when an individual's personal interests could compromise his or her judgment, decisions, or actions in the workplace including improper segregation of duties, and overlapping roles, for example, if it appears that any transaction in which the employee has a conflict of interest, that employee should avoid any decision-making in that transaction, but if it is necessary and unavoidable that employee shall proceed with prudence, impartiality, and transparency. Conflicts of interest must be disclosed and notify to stakeholders or other relevant.

Guidelines for Good Practice

- 3.1 The Company encourages employees in all levels to realize and be conscious of the anti-fraud and corruption campaign. It also provides an internal control in a bid to prevent corruption and bribery extant in every country in which the Company makes an investment.
- 3.2 The Company shall create conscience, instill morality and stimulate a positive attitude among the employees requiring them to honestly adhere to the law and regulations.

- 3.3 The Company shall create an efficient and effective internal control system with audits and appropriate use of power to prevent employees from any involvement in corruption.
- 3.4 The Company's directors, executives and employees shall refrain from any behavior relating to the demand or acceptance of assets or any other benefit or from condoning corruption for themselves or families, friends and acquaintance or others which may influence toward misconduct, cause dereliction of duties or cause harm to the Company.
- 3.5 The Company's directors, executives and employees shall refrain from offering assets or any other benefits to external parties with the intent to influence such parties to engage in misconduct or abandon their duties or to pay a bribe for the benefit of the business.
- 3.6 The Company shall report its financial statements accurately and transparently.
- 3.7 The Company shall provide communication channels for employees and related parties for whistleblowing, on the condition that whistle-blowers will be given complete protection. The Company shall also appoint officers to investigate such claims.
- 3.8 In order to clarify how the operation is of high corruption risk; the Company stipulates the administrators and all staff members to strictly adhere to the guidelines as follow;
- 3.8.1) Political contributions refer to financial aid or otherwise in order to support political activities such as money lending, personnel support, providing goods or services, advertising to promote or support the political parties, buying tickets for raising funds or donating money to an organization with close ties to political parties. However, it does not include the employees who join the activities on their own right; nevertheless, they cannot present themselves as Company representatives or use any Company assets, devices or instruments for political purposes. The Company insists on political neutrality. The Company will never provide a political party, politicians or a party's candidates with financial assistance for the benefits of the Company.
- 3.8.2) Charitable contributions, donations and aid grants may result in risk to the Company as such an activity is concerned with payment without obvious profit, used as an excuse to prevent a charitable contribution with concealed purposes. The Company stipulates policy and regulation as follows:
The Company is determined to provide donations for foundations, including associations, public charity, nursing homes, schools, Red Cross society and temples all of which are registered with the government Revenue Department, and these donations can be used as a tax deduction. It also scrutinizes provided donations for annual activities organized by either the Company or the temples under the allocated amount in the budget. In the case of an emergency caused by a public hazard or natural disaster, a donation can be made after obtaining approval from the administrators. However, in order to closely monitor and scrutinize the donation, extensive details and photographs must be attached together with the donation proposal.
- 3.8.3) Sponsorships are a way to publicize the Company's business reputation which is different from donations for charity. This may be done for the purpose of business, brand or reputation of the Company which is risk because it is a payment for services or benefits that are difficult to measure and track. Sponsorships may be linked to bribery. The Company has established policies and guidelines regarding to the sponsorships, process to review and control, details as follows:
- (1) The sponsorships must be examined or proved that activities are truly carried out for social benefit or as an act of corporate social responsibility. In this case, various necessary documents including receipts, project details and logo photo must also be attached.
 - (2) The sponsorships can be calculated, such as a contribution of accommodations and food, which is not related to the benefits for individuals or any agencies except as a decoration of honor traditionally practiced.
 - (3) The sponsorships can be made only if the payee is specifically identified together with the request document so as to obtain approval from the Company's administration.
- 3.8.4) Funding expenses provided to welcome customers and other hospitality expenses.
The Company realizes how good relations with its business allies can lead to continual achievement. It therefore allows staff members to either give or receive gifts, hospitality or other benefits within conditions specified by the Company as follows:
- (1) The activities are carried out in line with the sales promotion policy, the trade conditions or the counselling service. It also includes the expenses of travelling,

- accommodations, food or gifts provided by customers or any expenses provided to welcome the customers, the investors or the shareholders who visit and observe the Company's business management. This includes the gifts occasionally provided on annual festivals.
- (2) The expense funding is in accordance with related law.
 - (3) The expense funding is for the benefit of the Company and for not the personal benefit of the employees.
 - (4) The expense funding is not a kind of cash gift or equivalent to cash such as gifts or present readily exchangeable for cash.
 - (5) Gifts or hospitality are offered in line with appropriate tradition or festivals.
 - (6) Gifts or hospitality must not be offered especially during a bidding or procurement.
 - (7) They are openly offered and not contrary to procurement ethics.
- 3.9 Anti-corruption policy covers the personnel management process including personnel selection, the promotion, the training, the working evaluation and bonus. For this reason, the superiors in all levels are required to create a right understanding among the employees and urge them to strictly adhere to this policy. They also have to closely monitor implementation of the policy to ensure operations are carried out efficiently.
- 3.10 The Company will provide justice and protection for any employee, or others, who provide notification regarding the whereabouts of or evidence related to corruption in the Company and its group company, including any employees who object to said corruption. They will be given protection under the protection measures as regulated in the whistleblower policy.
- 3.11 Those who are involved in fraud and corruption which are considered as offenses within the regulations of personnel management are to face disciplinary punishment or legal punishment if the acts prove to be legal offenses.
- 3.12 The Company will regularly examine the guidelines and operational measures in order to comply with any legal changes and the business conditions.
- 3.13 In order to closely monitor the operations in line with the anti-corruption policy, the Company administration are required to afford an annual self-assessment.
- 3.14 The Company requires all staff members, including the Board of Directors, the executives and employees to strictly adhere to anti-fraud and corruption measures and also urges its business partners to jointly carry out these measures. The co-company or sub-company, if likely to be set up in the future, is also to adhere to this policy.

4. Responsibilities and Control

- 4.1 Board of Directors is responsible for formulating a policy and supervising anti-corruption process to ensure that the management recognizes and places importance on corporate governance in order to ensure transparency for shareholders and co-investors as well as relevant stakeholders.
- 4.2 The Board of Directors, executives and personnel including all stakeholders are required to comply with anti-corruption policies, and put these policies into practice.
- 4.3 The Board of Directors has authorized the Managing Director to set up sub-committees. At present, the Managing Director has established sub-committees including a Safety and Health management committee, the sustainability development committee, the environment management committee, the energy preservation management committee, Quality management committee, and Management Committee and working groups to manage various projects by assigning duties to help each other consider various aspects of work to ensure that operations and practices are in line with the good corporate governance policy.
- 4.4 The Audit Committee consists of independent directors who are responsible for reviewing internal control system and giving their opinion about internal control system, as well as ensuring that the Company complies with related laws.
- 4.5 The Audit Committee is in charge of assigning an internal auditor to review the internal control system. If the internal auditor is an external agent, the Audit Committee shall appoint a person who can coordinate with the internal auditor or assign the Committee's secretary to act as the coordinator.

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- 4.7 The Internal Audit Coordinator shall be responsible for receiving any complaints or any claims and coordinate with the internal auditor to review and report to the supervisor or Manager or Audit committee about complains.
- 4.8 **Receipt of Complaints and Whistleblower**
- Independent website provider receives complaints through the complaints channel on the website by forwarding to complaint@goldenlime.co.th
 - Supervisor / Supervisor in each department that employees trust
 - Company Secretary or Secretary to the Audit Committee
 - Coordinator with internal auditors or financial control manager
 - Human Resources Department
 - Public relations officer

5. Whistle-blowing or Complaint-making Policy

To supervise a mechanism for receiving complaints and taking action in the below topics through the complaint channel on the website where people find suspicions or offensive can notify the company through the channels provided

5.1 Whistle-blowing or Complaint-making matters

- Found fraud and/or concerns within the Company
- Meet operations / activities that are not transparent to Shareholders
- Personal data privacy
- Code of conduct
- Human Right
- Discrimination
- Sexual harassment
- Non – sexual harassment
- money laundering
- violations to the laws
- misconduct of employees
- Detecting anomalies in financial statements, insufficient internal control system, various potential risks
- Reputational damage and loss of credibility
- financial damage and damages to infrastructure and assets
- Others

Any of the complaints mentioned above done by personnel can be reported by employees and stakeholders including inaccurate financial reports I, flaws of internal control in order to involve personnel as well as stakeholders in monitoring efficiently.

▪ **Filing a complaint**

Filing a complaint should back up with as much provable fact or information as to be considered as complete complaint filing for further investigation process taken by the Company. The complete and acceptable complaint shall be composed of;

Basic facts mean facts of the situation that may, in fact, be extremely important in getting complaint correctly investigated and resolved. Basic facts should be as accurate as possible in order to establish complaint credibility so basic facts should include:

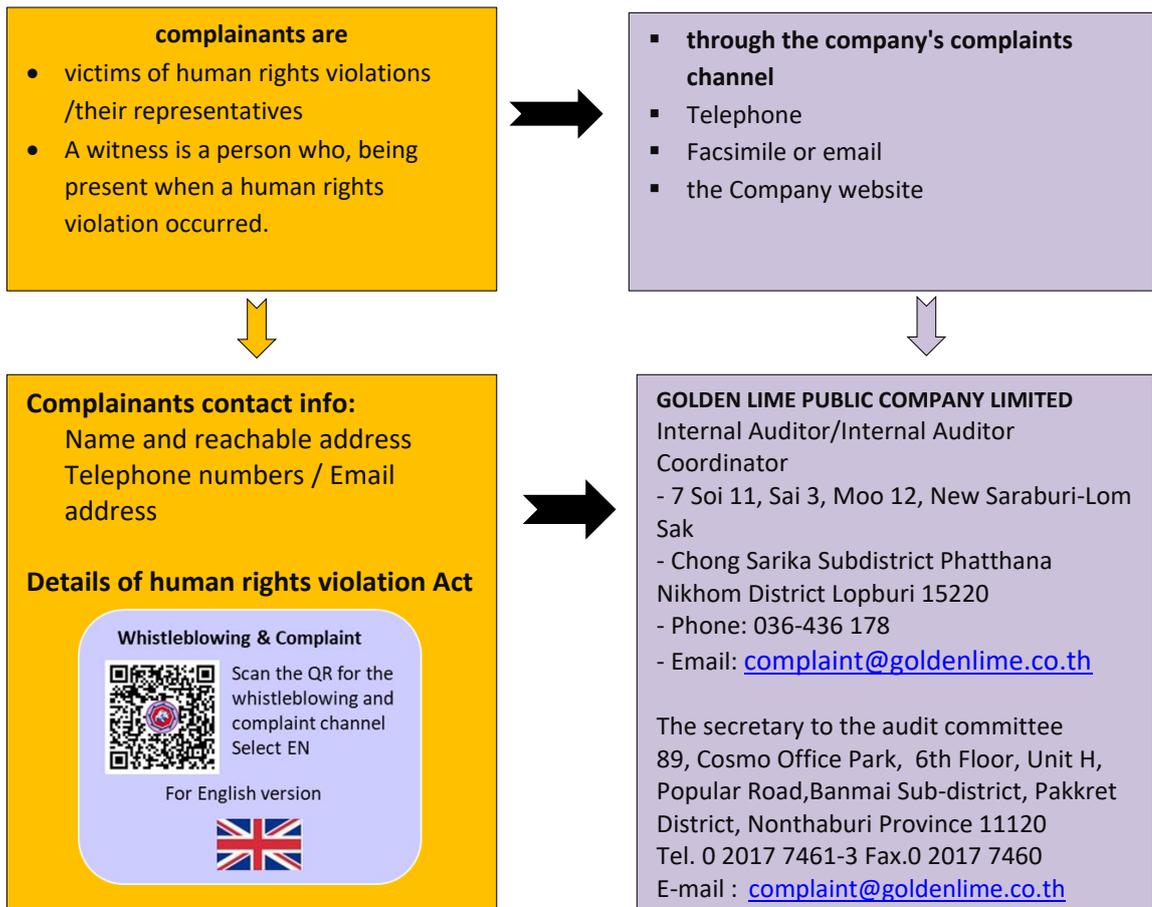
- Time and date
- Place

- The individual(s) or group(s) involved which may comprise not only those who are responsible for actions, policies of the Company, etc., but also subcontractors or operators involved in the complaint, potential witnesses, and others who may be needed to supply testimony or information.
- Relevant addresses, phone numbers, e-mail addresses, websites, etc.
- The number of incidents, and/or the duration of the problem, if it's ongoing.

Besides, during investigation process, in case a complaint lacks essential information, the Company will seek and request for any of the following forms of additional details.

- Photographs
- Testimony of whistleblowers or other eyewitnesses
- Testimony of people affected by the subject of the complaint
- Legally obtained memos, letters, e-mails, or other documents confirming the substance and details of complaint
- Logs, or audio- or video records of conversations
- The testimony of experts - psychologists, environmental scientists, economists, public officials, etc.

Others channel by SUTHA



▪ The website of the Company

goldenlime.co.th/ir_index.asp?complaints

GOLDEN LIME PUBLIC COMPANY LIMITED

Home About us Products & Service Sustainability Good CG Investor Relations Communcations Job Opportunity Contact

Chairman's Statement History Profile

Communcations

Channel Complaints Whistle-blowing or Complaint-making Policy [CLICK here for more details](#)

If you did not receive a fair investment, or found guilty of Acts of unfair competition on the company and investors, The Audit Committee and / or Board of Directors will performed with a complaint and clues that you inform us as soon as possible to be fair to investors

Please complete the form below, your information will be submitted to the Board / Audit committee who was appointed by CEO. Your information will be protected as confidential.

Category*

Description *

Attach File

Reply to complainant

Name *

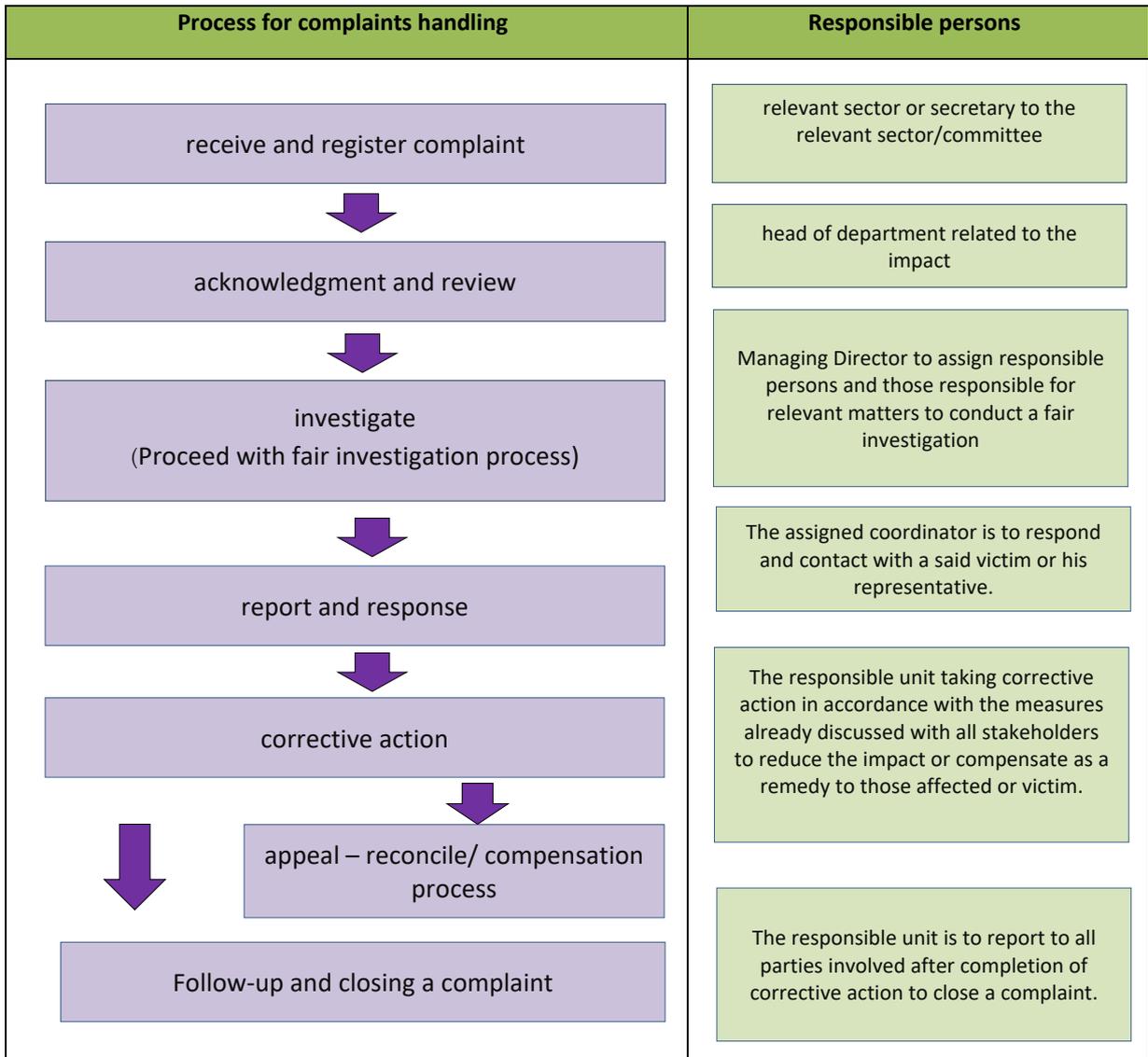
E-mail *

Telephone/Mobile

Other

I have read and accepted terms and conditions specified in the [Privacy Policy](#) and do hereby consent to the collecting, processing and/or disclosing of the personal data provided by me to fulfil the above-said purposes.

Filing a complaint should back up with as much provable fact or information as to be considered as complete complaint filing for further investigation process taken by the Company.



5.3 Responsibility and follow-ups

The follow-up process starts with receiving issues from the responsible unit to notify the chief or supervisors. Then in case the issue is considered a high-risk or high-severity issue, it must be reported in order from the department level, to the Managing Director to the meeting of the executive committee or any relevant committees depending on the impact and severity of the issue. If the issue is considered high or very high risk causing a big impact on outsiders, its impact and damage should be brought into the mitigation plan for implementing correction, mitigation, and remedies, compensation to provide relief to those affected or to have corrective action to get back to normal state or the risk level is reduced to an acceptable level. In the case of a complaint related to fraud or violating the code of conduct, there will be a process to investigate and verify the issue, If true, an employee shall be subject to penalties and reported. If the Company can contact those who address a complaint, the Company should report the complaint treatment status within 30 days. If the complaint closure requires longer days than previously identified, the Company shall report continuously until its closure.

5.4 Protective Measures for Whistleblowers and Investigative Participants.

To provide appropriate protection measures for whistleblowers, the following guidelines have been established.

- 1) The complainant can choose to remain anonymous for safety reasons. On the contrary, the Company can report progress and clarify the facts.
- 2) A Complaint Recipient shall
 - Set up a database for the confidential information of whistle-blowers and establish punitive measures against the officers in charge of keeping such a database if the confidential information is leaked.
 - This database must be made accessible to executives at the level of senior executive management only.
 - The Committee is determined to provide protection for the administrators or employees who report corruption or who adhere to anti-fraud and anti-corruption policy, which may otherwise result in the loss of business opportunity. It also seeks prevention for the employees from any penalty or position downgrade as a result of strictly adhering to the guidelines.
 - It falls under the authority of the superiors or supervisors of all those accused to give proper directives to protect whistle-blowers, witnesses, and those who provide evidence to the investigation to keep them out of danger, difficulties, or unfairness due to their making complaints, serving as witnesses, or giving information.

5.5 Questions or Recommendations

Any question or recommendation on corporate governance and anti-corruption policies should be addressed to the Secretary to the Audit Committee and Secretary to the Board of Directors, Telephone Number 0 2 017 7461-3 or Email: glmis@goldenlime.co.th

5.6 Punitive Measures

- 1) Those found guilty of serious misconduct will be dismissed from the Company and face legal punishment if they are found to be guilty of legal misconduct. Those found guilty of minor offences will face score reduction or a suspension from duties without any wages. They will also face a score reduction for job evaluation as well as the restriction from promotion and the restructure of income rate.
- 2) The superiors are to reprimand those found in violation of the Company's ethics including by score reduction for job evaluation, restriction from promotion or the restructure of income rate.
- 3) Those found in violation of the Company's regulation will receive a written reprimand from the Human Resources Department including score reduction for job evaluation, restriction from promotion or the restructure of income rate.
- 4) In case the offenders are the high-ranking administrators or on a Company committee, findings of the investigation must be forwarded to the Board of Directors in order to determine the penalty. The penalty will be based on legal considerations and good corporate governance.

6. Training and Communication

- 6.1** The Company communicates the anti-corruption policy and reporting channels via the orientation of directors, new employees, annual training and seminars, public relations boards, disclosure or annual report of the Company, internal communication platform, etc. so that everyone in the organization knows the practices and measures to strictly combat fraud and corruption.
- 6.2** The Company communicates the anti-corruption policy and reporting channels to the public, subsidiaries, relevant business partners, and stakeholders through annual information disclosure 56-1 One Report or the annual report, the Company's website, and notice board to educate and raise awareness in the anti-corruption as everyone's duty.
- 6.3** If any questions arise, please contact supervisors, accounting and finance manager, senior managers or the company secretary or audit committee

7. The Company specifies the guidelines to prevent corruptions as follows:

7.1 The Assessment of Corruption Risk

The Company has regulated the risk management system based on business operation in a bid to prevent and suppress corruption or any activities of high risk from corruption likely to occur as a result of the Company’s business operation. It also evaluates the risk level including its chances and effects as well as regulates the anti-corruption measures based on evaluated risk including the achievement evaluation and resources to be used to lessen the risk and follow up on the performance appraisal.

7.2 Guidelines to Monitor Supervise and Prevent Any Involvement in Corruption Risk

The Company has regulated guidelines to monitor, supervise and monitor the risk on fraud and corruption as follows:

- (1) Procedures, including an internal control system and risk management, which cover important work systems such as the sales and marketing system, procurement, control, budget management, account record and payment. This aims to prevent as well as monitor the risk on fraud and corruption and provide appropriate suggestions for solutions.
- (2) Provide a channel of information including evidence or complaint of a legal offense or a violation of the Company’s business ethics, as well as guidelines to prevent any involvement in corruption, suspicions on the financial report or the internal control system. The Company is to provide protection for those who submit information or evidence. The information is to be treated as confidential. The Company must exercise disciplinary or legal punishment. Protection will be granted to those who submit evidence or complaint by means of written statement.
Heads of each department are in charge of monitoring the operations and informing the persons in authority.

The anti – corruption policy and guidelines were established in 2014 and revised No. 1 to be announced on April 6, 2023, proposed to the Board of Directors Meeting No. 4/2023 on May 12, 2023 for acknowledgment of the annual policy review.



Mr. Sripop Sarasas
Chairman of the Board of Directors

Revision listing of policies for annual review.

Item	Document number	Prepared by documentation	Annual Review	Reference the Board of Directors Meeting to reviewed
1	CS20220801	17 August 2022	Annual Review	Proposed in the Annual Report and the Company Website
2	CS20220801_Rev.1	6 April 2023	12 May 2023	The Board of Directors Meeting no. 4/2023