



Anti-Corruption Policy & Practices

BJC Heavy Industries Public Company Limited

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Introduction

BJC Heavy Industries Public Company Limited (“the Company”) operates its business under its ideology with the moral principle, honesty and transparency by conforming to responsibilities to societies and all stakeholders under Good Corporate Governance practices. Thus, the Company announced its determination to become a member of the Private Sector Collective Action Coalition against Corruption or CAC to express its intention in Anti-corruption directly and indirectly. The Company realizes that corruption and bribery are the obstacles in developing societies and economies. These also result in unfair business operation, ruin the Company’s reputation and make the Company unacceptable by destroying confidence of shareholders, investors and all stakeholders. To tackle that, the Company defines practices to Anti-Corruption which is considered as the supplementary part of business’s code of conduct according to the Company.

To ensure that the Company, associated companies and subsidiary companies and other companies where the Company can control (if any) have the policy taking responsibilities, practices and regulations in an appropriate manner against corruption and bribery which might take place with business operation in order to ensure that decision-making process and business operation possibly related to risk of corruption and bribery must be fully considered and taken into actions. Thus, the Company provides the written anti-corruption practices and informs as well as communicates the particle standard to the Board of Director, Executive Director and all employees of the Company, associated companies and subsidiary companies and other companies where the Company can control to conform to the guideline for business operation to develop the Company on a sustainable basis.

The Company would like all employees to fully understand abide by Anti-Corruption Policy & Practice. In addition, Anti-Corruption Policy & Practices to becoming effective since 15th August 2017 onwards is also considered as the part of working procedure.

(Ms. Pakavalee Jearsawatvattana)

Chairman of the Board of Directors

BJC Heavy Industries Public Company Limited

ANTI-CORRUPTION POLICY & PRACTICES

Directors, Management and employees of BJCHI are prohibited from directly and/or indirectly bribery/corruption in any form in order to benefit himself and related persons regardless of receiver, giver or a bribery proposer both as money or non-money items to government agencies or private sectors the Company contacts to strongly abide by Anti-Corruption Policy & Practices.

Definitions

Corruption refers to all kinds of bribery including but not limited to fraud, cheat, dishonesty such as offering, giving, requesting or receiving money, assets or inappropriate benefits with officials/government agencies, officers/private sectors, employees and/or all stakeholders directly and indirectly or from third parties such as making untrue financial documents, abstaining from conducting one's duties, utilizing the Company's assets for personal or family, distorting information leading to misunderstanding, fraud, concealment of evidence and taking actions where are beneficial for one or his/her relatives in order to perform or abstain duties. These results in gaining or keeping business, introducing business to the Company in particular including benefiting and keeping inappropriate benefits except as allowed by the laws, rules, regulations, local customs or tradition, or business customs.

Conflict of Interest means activities are conducted for personal's preference or related persons both from bloodline or others which has the influential for decision-making or even is considered as obstacles to maximize the Company's benefits

Offering benefits or other contributions refer to offering assets, rights in form of assets, money or non-money items, and other contributions as reward, gifts to build special relationship in any way.

Political Contributions refer to offering money, assets and other benefits and/or support employees to participate in political activities to help political parties , politicians or any person whose duty involves politics or political activities either directly or indirectly to receive special and unfair rights on business. However, it is not applicable for employees attending such activities as personal freedom.

Charitable Contributions refer to money or item donations or other benefits to external organizations.

Sponsorships refer to subsidy, allowance or contributions paid or received from clients and business partner on a reasonable basis under the objective to support business, promote products or the Company's reputation which are helpful for creditability, business relationship coinciding with the practices of code of conduct based on accuracy, transparency and Good Corporate Governance.

Bribery refer to offering assets, gifts, award and other benefits to a person who can perform or abstain duties to encourage one to take actions on a fraudulent, illegal or unethical basis directly and indirectly.

Gifts, award or other benefits refer to valued items which also might be mental value both as money and non-money items which are given in special events on a traditional or cultural basis with courteousness. The award is provided to honor or support one as the special rights, entertainment, leisure, travel expenses or service expenses, accommodation and food allowance or other similar aspects. In addition, this includes giving gifts such as New Year gifts, birthday gifts and gifts for job promotion.

Related persons refer to the following Persons

- 1) A person who can control the Company. In case of juristic person, this includes directors of that juristic person.
- 2) Spouse, child, father, mother, siblings, relatives of directors, executives or a persons from 1) and all employees of the Company.
- 3) Juristic person from 1) or 2) which can control the Company
- 4) Other persons with characters which is defined by the Office of the Securities and Exchange Commission.

Stakeholders refer to shareholders, investors, employees, customers, creditors, business partners, government agencies, private sectors, societies, communities and environment

Roles and Responsibilities

- 1) **The Board of Directors** perform their duties and responsibilities as well as oversee the supportive system for Anti-corruption Practices efficiently to ensure that Executive directors realize and pays attention to Anti-corruption Practices and to cultivate it as the Company's value in order for all employees to fully understand and recognize the importance of troubles stemming from Corruption and Bribery.

If Audit Committees report case of Corruption and Bribery impacting the Company, The Board of Directors has duties to advice, recommend and consider penalty and find the solution tackling the problems to Chief Executive Officer and Executive Committees.

- 2) **Audit Committees** have duties and responsibilities as follows
 - 2.1 Consider Anti-Corruption Policy & Practices assigned from Executive Committees to match with the Company's business operation and environment, culture and propose to The Board of Directors for approval.
 - 2.2 Consider and review the changes in Anti-Corruption Policy & Practices provided by Executive Committees and propose to The Board of Directors for approval.

- 2.3 Review its financial and accounting report, internal control, internal audit system and risk management system to ensure that they comply with international standard on a prudent, up-to-date and efficient basis.
 - 2.4 Receive report suspicious situations considered as corruption and bribery in which the Company's employees engage and investigate fact findings and propose to Executive Committees to mutually consider penalty or find the solution to the cited problem.
- 3) **Internal Audit** has duties and responsibilities as follows
- 3.1 Audit and review the procedure of internal audit plan that it complies correctly with policy, procedure, authority rules, regulations and law to ensure appropriate and efficient internal controls systems against risk of corruption and bribery which might take place and report to the Board of Directors.
 - 3.2 Perform duties as assigned by Audit committees related to the investigation of the Company's' corruption and bribery in addition to internal audit plan as defined.
- 4) **Chief Executive Officer and Executive Committees** have duties and responsibilities as follows
- 4.1 Define Anti-Corruption Policy & Practices as well as promote and support such that policy and practices.
 - 4.2 Communicate with employees in the organization and related persons to fully acknowledge Anti-Corruption Policy & Practices
 - 4.3 Review the appropriate system and measures including Anti-Corruption Policy & Practices to make them suitable for the changes in business environment, rules, regulation and law.
 - 4.4 Assist Audit Committees for fact findings as informed or assigned by Audit Committees about the investigation of corruption and bribery issues with the authority to assign tasks to the management if needed.

Guideline of Anti-Corruption Policy & Practices

The Board of Director , Executive Committees and employees must strictly comply with code of conduct, policy and Anti-Corruption Practices without engaging in corruption and bribery cases directly and indirectly including contractors and sub-contractors;

- 1) Do not express behavior related to receiving or offering bribery to stakeholders directly and indirectly to gain corruptible benefits as follows;
 - 1.1 Do not receive or offer gifts, souvenir, cash, cheque, bond, share, gold, jewel, real estate or the similar type of items to a person who is contacted both in government agencies and private sectors.

- 1.2 Do not receive gifts, reward, presents or any benefits resulting in abstaining him from performing duties and before receiving such items, a receiver needs to ensure that it complies by law and the Company's rules. Moreover, such items should not be expensive and suitable for each occasion.
- 1.3 Do not offer gifts, reward, presents or any benefits encouraging receivers to take different actions with other business partners. Such items which are occasionally provided must not be more expensive than a normal basis.
- 1.4 Do not act as the middleman to offer cash, assets, items and any other benefits to related persons with business, agencies, government agencies or any other organizations to exchange with special privileges in order to encourage government officers to abstain from complying with rules and regulations as well as specified law.
- 2) Procurement must follow the Company's procedure on a transparent and accountable basis.
- 3) Entertainment cost and others relevant to business contract can be done with a reasonable and accountable basis.
- 4) In case of charitable donation, the practices are as follows;
 - 4.1 Money or the Company's asset used for charitable donation must be on behalf of the Company. To make charitable donation for foundations, public and charitable organizations, temples, hospitals, sanatoriums or social organizations requires certification with trustworthiness, accountabilities and complies with the Company's rules.
 - 4.2 Personal's charitable donation can be done but not related to or caused corruptible actions to gain any benefits.
 - 4.3 The charitable donation must be transparent under law, ethics and verified with supportive evidences.
- 5) With respect to money or the Company's asset used to support a project, only the Company's name can be stated. Such utilized money must be distributed to build good images and reputation under the business objectives. Clear objectives need to be clearly defined with accountable evidences under the Company's rules.
- 6) Do not take any actions relevant to the political issues inside the Company's premises and do not use the Company's resources for such that purpose. The Company's determination on political issue is neutral with conformity to law, democratic system without any political aids to political parties directly and indirectly.
- 7) Employees must not ignore the potentially corruptible situation relevant to the Company directly and indirectly. Employees need to inform their supervisors or responsible persons to receive fact findings. If there are any questions, please consult with the supervisors or responsible persons regarding conformity to code of conduct as distributed by defined channels.

- 8) The Company shall ensure fairness and protection of employees who refuse or report corruption related to the Company by implementing measures to protect complainants or collaborators in reporting corruptible actions as defined by the Company measure of Protection Measures and Confidentiality Practices.
- 9) Directors, executives, and employees who commit fraud and corruption which are considered as Illegal acts of the Company will be considered a disciplinary action imposed by the Company. In addition, if the action is illegal, may also be punished by law.
- 10) The Board of Director, Executive Committees recognize the importance of distributing knowledge, providing recommendation and making employees and related persons understand practices to anti-corruption so as for them to comply fully with policy and practices to anti- corruption on a honest and ethical basis.
- 11) The Company determines to build and keep the corporate's cultures against corruptible actions, bribery issues which are not acceptable regardless of persons or transactions with government or private sectors.
- 12) Anti-Corruption Policy & Practices is applicable to human management process from recruitment, selection, promotion, performance evaluation and remuneration. The supervisor from all level must communicate and educate employees for such that matter using in business activities under responsibilities and governance efficiently.

Contractual practices between the Company and customers or partners

The Company has a policy of trade and investment under the Code of Conduct and good corporate governance for shareholders, stakeholders and society. The Company does not have any policy to request or offer any financial or non- financial benefits on a corruptible basis to a person or an agency to gain business contract or privileges without an ethical basis. Practices to contracts between the Company and clients or business partners are as follows;

- 1) **Honestly conducting business.**
 - The Company must not perform any action considered as corruption, extortion or misappropriation while procedures for monitoring and enforcing need to be provided in line with code of conduct.
 - The Company must not offer gifts, presents, fees, services ,discounts, special rights or other benefits for business partners' employees or families of them in order to receive special privileges from business partners excepting in case of being under local traditions and laws.
 - The Company must not offer and provide valued items including money, bribe, reception or bribery money to officials who engage in the Company's transaction including training program for directors, executives and employees according to Anti-Corruption Policy & Practices. This includes disallowing to provide bribe to gain business benefits of business partners.

- Directors, executives and the Company's employees are not allowed to receive and ask for valued items such as gifts, money and other benefits from clients or business partners. Also, the Company provides the channel to inform suspicious situation for clients or business partners who can inform any issues violating policy and practices to the Company.

2) Conflict of Interest

The Company must not engage in relationship in financial aspect or the Company's employees which might cause or be deemed as the conflict of interest. This disallows executives, directors, employees, representatives and consultants of business partners except only the case of executives' permission. Business partners need to disclose and alter potential Conflict of Interest which takes place and might do.

3) Privacy and Intellectual Property

The Company will protect against misappropriating or abusing Intellectual property and confidential information. In addition, business partners must not use such that Intellectual property and information if not approved by the Company. Business partners who gain intellectual property or confidential information must implement appropriate procedures to protect against disclosure or abuse of intellectual property and confidential information without any permission. Also, business partners need to ensure that legitimate intellectual property of employees, clients and partners is protected.

4) Business Practices and Fair Competition

The Company adheres to the principles of conducting, advertising, fair competition with all relevant laws and regulations while business partners must implement suitable procedures to protect client's information. This includes prohibiting business partners to engage in abuse of information, price estimation, tender bids or any agreement to reduce competition in all transactions for the Company in order for business partners to fully recognize and abide by relevant law with fair competition and without all monopoly frameworks.

5) Obligation and Responsibilities

The Company must comply with the determination defined in code of conduct by utilizing resources with an appropriated basis and communicating principles stated in code of conduct to business partners.

Practices in storing, accessing, recording, maintaining, and backing up financial data.

The Company aims to remain the standard of working system, Information technology as the foundation in creating the efficient controlling system. The Company will perform all issues to ensure that financial information

is prepared in an accurate, sufficient, transparent and accountable basis. In addition, the Company organizes systems of storing, accessing, recording, maintaining, and backing up financial data on a server system efficiently and ready for re-use on a timely basis including protection against using information for benefits of personal, relatives and related persons and/or businesses that compete with the Company both directly and indirectly without ethical and conscious basis.

To achieve that determination under code of conduct and good corporate governance, the Company defines practices in storing, accessing, recording, maintaining, and backing up financial data as follows;

- 1) Documents and financial data kept internally and externally are systematically for storing, accessing, recording, maintaining to prevent unauthorized access, use, modification, addition, destruction and / or misuse of information whether done by accident or intention, and to be able to examine documents and financial data subsequently.
- 2) Actions relevant information technology and communication must follow the policy and guidelines for accessing or controlling the use of information. It also includes the security of the Company's information at all times.
- 3) Evaluate the risk and establish a risk management system appropriate to the changing environment on a up-to-date basis.
- 4) Executives and employees should protect their accounts, username and password, by disallowing them to share and distribute those to others without any permission.
- 5) The Company has the right to inspect the use of computers, including related equipment, data and information technology without any permission from users.

Practices in information disclosure and confidentiality

The Company discloses necessary information to executive, employees, stakeholders and related persons on an accurate, sufficient, timely, transparent basis through the accessible channel by disclose the information in the form of Annual Information Disclosure (Form 56-1) and Annual Report (Form 56-2) including the Company's website and other appropriate channels to efficiently perform duties in accordance with rules and regulations of SEC and SET.

In addition, the Company is committed to maintaining confidentiality based on Handling confidential, market-sensitive information: Principles of good practice as the good practices for the Company and prevent the disclosure of confidential information which might cause destroy to the Company or used for the abuse of benefits with taking advantages of investors, shareholders and stakeholders in public.

Practices for dealing with confidential information that affect the price of securities are as follows.

- 1) The directors, executives and employees should comply with the Company's policy on securities trading include trading instructions by avoiding trading the Company's securities for a period of 1 month prior to the disclosure of financial statement to the public with using insider information according to the Company's code of conduct.
- 2) The Company has limited the number of persons who need to access to confidential information as less as possible (need to know basis).
- 3) The Company has a preservation copy documents related to confidential transaction on a safety basis and destroys when no need to use. There are a limited group of assigned staff or employees to get access to information.
- 4) The Company cultivates its culture by regularly communicating to ensure that all employees are aware of their duty to maintain the Company's confidentiality and also to avoid disclose that to public.
- 5) The Company reviews regularly by storing and controlling information up-to-date on a safety basis.

Practices to provide or receive gifts, presents or other benefits

To maintain code of conduct and good corporate governance, the Company then defines practices to provide or receive gifts, presents or other benefits as follows;

- 1) Forbid director, executive, and employees of all levels and/or families receive or offer gifts, presents or other benefits to clients, business partners, contractors, sub-contractors and persons who are related to the company's business. However, this does not include receiving or offering traditional gifts to keep relationship on a personal and organizational basis. Receive or offer gifts, presents or other benefits must be not influential on decision-making process for business issues.
 - 1.1 If employees provide or receive gifts, presents or other benefits with the value over 3,000 Baht, they must respectively inform their supervisors and deliver such gifts, presents or other benefits to the Company's secretary to record in a form of Report of Giving or Receiving of Gifts, Presents or Other Offerings to be used and maximize for the Company's benefits.
 - 1.2 In case, authorized persons and supervisors consider to reject gifts, presents or other benefits, such that items must be sent back immediately. If not, they must be deliver to the Company's secretary to record in a form of Report of Giving or Receiving of Gifts, Presents or Other Offerings to be used and maximize for the Company's benefits.
 - 1.3 A transaction must be done in public areas and able to disclose to employees and any persons.
 - 1.4 During the process of selecting contractors, sellers, service providers or tender bids, employees must not receive gifts, presents or other benefits, from a company or person entering into the process of selecting contractors, sellers, service providers or tender bids.

- 2) Forbid director, executive and employees of all levels receive or intend to receive or offer money, asset, items or other benefits from a person who has intention to encourage such mentioned persons to abstain from performing duties including any corruptible actions honestly.
- 3) In case of offering gifts, presents to the Company's representatives and such these items which are made as the Company's memorable milestone. All staff at all levels can be accepted on behalf of the Company. Such t items must be delivered to the Company's secretary to record in a form of Report of Giving or Receiving of Gifts, Presents or Other Offerings as the company's assets.
- 4) Keep proof of spending showing value of gifts, presents or other benefits where can be verified.
- 5) To comply with these practices must not be contrary to the Notification of the National Anti-Corruption Commission regarding the criteria for the receipt of property or any other benefits on the government's ethical basis.

Practices to welcoming party

The Company has Practices to welcoming party as follows;

- 1) Must comply with tradition as normal practices.
- 2) Must stick to sufficiency economy, be economical and suitable for occasions.
- 3) Must not violate rules and law within good corporate governance and code of conduct

Practices to charity donation

The Company will promote ethical principle to be Thai's society by providing donation for foundations or charitable organizations occasionally. However, to ensure that Practices to charity donation is efficiently executed with a transparent basis, the Company defines Practices to charity donation as follows;

- 1) Donations must be for public charity or have a clear purpose to benefit society, no hidden object or to get the improper business benefits.
- 2) Must be approved by the authority in accordance with the Company's regulations. Under the good corporate governance policy and business ethics.
- 3) Maintain evidence of donation value and clearly identify the name of the donor to be helpful for re-checking.

Practices to sponsorship

The company implements the internal control system, internal audit to ensure that money is used on a reasonable transparent basis in order to protect against corruption and bribery. The procedure for approval and funding is in line with the internal control system is as follows,

- 1) Sponsorship Objectives must be clear without any hidden agenda. Funding must be used to support business operations, promoting the brand or reputation of the company which increase business creditability or business relationship under Code of Conduct and Good Corporate Governance.
- 2) The location of the sponsored activity is clearly identified which can be verified by proof of receipt of money or official documents from the agencies who requested or received money from government or private sectors for disbursement and control of expenses as specified strictly to maximize the Company's benefits.
- 3) Clearly assign responsible persons for the activities to obtain sponsorship clearly, tracked and reported to supervisors on an accountable basis.
- 4) The information of the sponsorship must be actually gathered to be usefully analyzed, planned and served as internal information for future sponsorship approval.

Practices to political contributions

The Company is political neutrality without any preference in a specific political party, politician and strongly sticks to democratic system. The Company does not have any policy to provide money, asset, and rights or engage in political party, politician or political-related persons directly and indirectly to underpin its business. The Company recognizes that employees have rights and duties in democratic system to take part in or support political activities independently under a constitution, law and related rules. Practices to political contributions are as follows;

- 1) Directors, executives and employees have the political rights to take part in or support political activities personally outside of working hours and not on behalf of the Company. The Company's assets must not be used to support political activities, political parties or any politicians directly or indirectly with disallowing political parties to use the Company's resources to organize political activities.
- 2) Directors, executives and employees are not allowed to become members or representatives of political parties in holding public activities which might result in misunderstanding for the Company to be involved in such a political party.
- 3) Do not use authorities to invite, put and force colleagues, subordinates to support political activities of political parties or politicians either directly and indirectly.

Audit and internal control process

Audit and internal control process are mutually defined by the Board of director, executives and persons of all departments to ensure that procedures and working process will help the Company achieve its objectives and be served as tools to protect against corruption in working process of all departments.

Also, the management from each department needs to design internal control process and produce working procedures or process to manage and reduce the risk of corrupting, communicate, understand, control and monitor the operation of personnel in the unit to operate in accordance with the system of internal control on a written basis proposed to the management from each department for review and top management as assigned for approval. In addition, the duties and responsibilities of each position are clearly defined in the implementation of procedures or processes. All related documents must be gathered in order for related persons to get access to that and to be informed. Moreover, the management from each department must review working procedures or process at least every three years or once there are significant changes impacting working procedures or process to ensure that working procedures or process coincides with good internal control principles with the suitability for current working procedures.

The Company has the internal audit team responsible for reviewing compliance with the internal control system, provide feedback and solutions to improve or develop internal control effectively and efficiently, prevent and detect potential risks includes reviewing the implementation of anti-corruption procedures. The internal audit team can perform duties independently and propose report straightforwardly when significant mistakes are found to executive directors and Audit Committees. Also, the management from each department needs to take recommendation into practices to improve and develop internal control process to increase efficiency.

In addition, the Audit Committee is responsible for overseeing the preparation of financial reports, internal control system, internal audit system and compliance with laws as well as Anti-Corruption Policy & Practice.

Monitoring and reviewing

The Company requires the Board of Directors, executives and all employees to acknowledge and comply with the Company's Anti-Corruption Policy & Practice.

If there is any doubt that the activity or action may violate policy, law or regulations, it must be reported in accordance with the complaints / clues as specified. If any of the directors, executives, and employees are found guilty, they will be subject to disciplinary action. Moreover, If there are any illegal acts, rules, and regulations of the government sector, the Company will submit such breached issued to government officers onwards.

The Company defines monitoring and reviewing process on a regular basis or once significant affect the risk management on corruption to ensure that such measures are consistent with good corporate governance and code of conduct as well as rules and related laws. Also, changes need to be approved by the Board of Directors and then communication about that is needed.

In addition, Audit Committees will oversee the implementation of the Anti-Corruption Policy & Practice by reviewing measures and internal control system on a suitable basis. Then, recommendation will be provided to the Board of Directors, executives and employees of related department.

Practices to protective and confidentiality

In order to protect the rights of complainants and contributors who act with integrity, without any bias, the Company will conceal its name, address or relevant information to identify the complainant or the data provider will be kept in confidential. Only those who are responsible for investigating complaints can access such information.

- Chief Executive Officer has duties to make discretionary decision to protect one who makes complaints, witness and an information provider to gain fact finds without any troubles, dangers or unfair treatment stemming from such complaints.
- Chief Executive Officer can assign an executive management taking role in making discretionary decision to protect one who makes complaints, witness and an information provider. The assigned executive must not involve in such suspicious issues or complaints directly and indirectly (for example, accused person is an executive's direct subordinate.)
- A person receiving the information of complaints and evidences must keep information confidential and is not allowed to disclose such information to irrelevant persons except only for the legal requirement.

In case of complaints, Chief Executive Officer and/or Executive Committees, the Audit Committees will take protection actions for one who makes complaints, witness and an information provider to take fact finding in order for them not to face with any troubles, dangers or unfair treatment stemming from informing such suspicious situation or complaints. Such information is requested to submit directly to the Audit Committee.

In case of complaints which are related to directors or the Audit Committee, the Board of Directors must appoint an intermediary to take a direct investigation. Related directors are not allowed to receive information, to take roles in protecting one who makes complaints, witness and an information provider to take fact findings in order for them not to face with any troubles, dangers or unfair treatment stemming from informing such suspicious situation or complaints. A person making complaints is encouraged to inform such suspicious situations to a person who is not directly related to such complaint issues.

Practices to investigation and penalties

- 1) Upon receiving a clue. Chief Executive Officer, Executive Committee and / or the Audit Committee will be moderator Investigation facts by delegate or appoint a representative and inform the progress to one who makes complaints periodically.

- 2) If the investigation finds any information or evidence that the accused person has committed a genuine act of corruption, the Company shall grant defendant the right to know the allegation and grant the right accused of self-identification by finding additional information or evidence showing that they are not involved in corruption as allegedly
- 3) If an accused person becomes involved in corruption and considered as the violation of Practices to anti-corruption and code of conduct, that person will be investigated and imposed disciplinary penalties according to the company's working regulations. Also, if the corruptible action becomes illegal, Offenders may also be subject to legal penalties.

Protecting directors, executives and employees

The Company is confident that its directors, executives and employees will not be affected from refusing to bribe although such a rejection would lead to a loss of business benefits. The Company strongly believes that Anti-Corruption practices will help to create value for the company in the long run.

Distribution of anti-corruption practices

The company provides communication and discloses such information related to Anti-Corruption policy in order for executives, employees and related persons to fully recognize that on a suitable basis such as meeting, training, public relation notice, website, annual report and other channels to ensure that the Company does not engage in corruption including running its business on a transparent and accountable basis.

Matters related to suspicious situations and corruption

- 1) Encountering fraudulent actions involving the organization both directly or indirectly, for example, a person in the organization engages in bribery issues with government officers or private sector.
- 2) Actions violate the company's rules or have the impact on internal control system which might lead to corruptible actions.
- 3) Actions result in the loss of company's benefits and reputation.
- 4) Actions become illegal, unethical and violate code of conduct.

Communication channels to report suspicious situations or request recommendation related to anti-corruption

Reporting suspicious situations which might be involved in corruptible actions, improper, break law and the Company's regulations as well as code of conduct is considered to be one of the channel that help the Company to get information about corruptible actions faster which in turn help the Company to take immediate actions. This also helps to protect the Company's benefits of stakeholders efficiently. To do that, one who makes

complaints or request recommendation needs to specify the details of suspicious situations, complaints or issues along with name, address and telephone number. Thus, the Company defines communication channels to report suspicious situations, complaints or request recommendation about anti-corruption as follows;

- 1) Employees or stakeholders who face with corruptible actions within the Company or any suspicious actions which might get involved in corruption must immediately report such issues to their supervisors or internal audit team or responsible persons or complaint channels of the Company as appropriate. If there are any questions, please consult directly with the supervisor or internal audit team or responsible persons
- 2) Enclosed mail and send directly to Chairman of the Board of Directors as follows;

Chairman of the Board of Directors
BJC Heavy Industries Public Company Limited
594 Moo 4 Makhamkoo, Nikompattana, Rayong 21180

- 3) E-mail
 - Audit Committees : id@bjc1994.com
 - Complaint unit : spy@bjc1994.com
- 4) Opinion Box located inside the Company and working sites.

In case of one who would like to inform complaints to Chief Executive Officer or Executive Committees, please send the complaints to Chairman of Audit Committees directly.

Persons who can inform suspicious situations or makes complaints are all the Company's stakeholders composing of shareholders, customers, business competitors, creditors, government sectors, communities, society, executives and employees. The information will be kept confidential no matter what communication channels are used.

In case of urgent issues related to corruption, related persons must immediately and respectively reported and then propose to the top management to make quick decisions.

To report suspicious situations or make complaints must be made in good faith. If the Company finds fraudulent notices, intent to bully others to damage, degrading reputation, being insulted, being abhorred or being embarrassed, etc., if done by the Company's employee, the disciplinary punish will be imposed. However, if the outsider resulting in destroys to the Company, the offender will be prosecuted as specified by law.

Anti-Corruption Policy & Practices effected from 15th August 2017 onwards.