

ANTI-CORRUPTION POLICY

Chotiwat Manufacturing Public Company Limited (CMC) engages in honest, transparent and justice business practices according to corporate governance principles. We are intolerant of both direct and indirect corruption in any form, policies and legal. CMC Personnel shall act in according with this Anti-Corruption Policy.

Definition

Announcement number 52/2564

Corruption means any types of bribery; an offer, giving, promise or agreement to give, demanding or accepting money, assets or other inappropriate benefits from government officers, government sectors, private officers, private sectors or responsible persons either in direct or indirect action so that such person could proceed or disregard their functions in order to acquire, retain the business, recommend a specific company or subsidiary company to the entity or achieve any improper benefit from the business transaction. Exceptions shall apply in cases where laws, regulations, statements, standards, customs or business traditions enable us to do so.

Roles and Responsibilities

- 1. The Board of Directors, the management team, staff at every level of CMC and subsidiary company must follow the Anti-Corruption Policy by avoiding involvement with any course of corruption in a direct or indirect manner.
- 2. CMC and subsidiary company Personnel shall perform with care in receiving and providing gifts, assets, service or hospitality ensuring compliance with CMC Gifts and Entertainment Policy. However, providing and receiving gifts and hospitality must have business or custom objectives. The value of such gifts and hospitality must be appropriate and must not affect practical decision.
- 3. Granting contributions or aid must be transparent and in accordance with stipulated laws in order to assure that the granting contribution and aid will not be claimed as corruption.
- 4. CMC and subsidiary company Personnel shall not be negligent in any potential corruption involvement and must notify such act to supervisors or responsible persons provided in particular channels, including collaboration with investigative efforts.
- 5. CMC will effectively safeguard the whistleblowers information and proceed with the utmost vigilance. The personal information will use for a proper investigate and fairness, which will be carried out in a confidential manner to ensure whistleblowers who make the reports will have their identities protected. Nevertheless, whistleblowers are not required to disclose themselves.
- 6. CMC and subsidiary company shall provide fairness and safeguard staff who deny or report corruption cases relating to CMC by applying Protection Policy for appellants or persons who act in accordance with Anti-Corruption policy.
- 7. CMC and subsidiary company highly regards the importance of dissemination, communication and knowledge sharing with CMC Personnel and stakeholders to ensure clear understanding about Anti-Corruption Policy.



- 8. CMC and subsidiary company, assesses and evaluates all business transactions to ensure they are accurate and in compliance with guidelines and policy in order to assure that the internal controls are sufficient and suitable for identifying potential corruption.
- 9. Management team and staff who concern with procurement process or external interested parties must be complied with anti-corruption rules transparently.

Whistleblowing Policy

The internal auditor provides channels to report malpractice concerning all staff and stakeholders. The channels to inform are easy and effective in safeguarding the information of whistleblowers that defines 4 channels;

- 1. Website: www.chotiwat.com
- 2. E-mail: anticorruption@chotiwat.com
- 3. Letter to : Audit and risk management committee
 - Chotiwat Manufacturing Public Co.,Ltd.
 - 1069 Asia Highway Rd, Kho Hong, Hatyai, Songkhla, 90110, Thailand.

Penalty

Offenders of corruption are considered in violation of employment regulations set forth by personnel management. These offenders will receive disciplinary punishment as well as legal punishment.