



# Anti-Corruption Policy Guideline of Global Green Chemicals Group

## Policy

Global Green Chemicals Public Company Limited and its subsidiaries (“the Group”) are committed to operating the business by placing importance on anti-corruption. It strives to comply with anti-fraud, anti-corruption and anti-bribery laws involving officials in the government and employees of the private sectors, either within or outside the country, and also promotes an anti-corruption awareness among its personnel.

The Board of Directors has therefore formulated this guideline which is deemed as part of the Corporate Governance Policy to ensure compliance of the Group. Also, the guideline is to be observed as a standard practice for directors, executives, employees, contractors and all personnel engaging in activities that are for the benefit of the Group. Any violation of laws considered inappropriate and against the Company’s policy shall be subject to disciplinary and legal actions.

## Definitions

**Fraud** means any activity in which one engages to seek illegal benefits for oneself or the others, which also includes misappropriation, creative accounting, and corruption.

**Corruption** means conducting one’s duties, whether for offering, or promising, requesting, demanding, giving, or receiving assets or other benefits to government officials or other parties engaging in a business with the Company, either directly or indirectly, with an aim for such person to conduct or abstain from conducting his/her duties, or to obtain or maintain other benefits which are not appropriate in terms of business, except those exempted by laws, rules, regulations, local traditions, or trade customs.

**Offering or Receiving Gifts** means offering or receiving money, gift, compensation or any other benefit.

**Reception and Hospitality** means spendings made on business receptions such as meals, sports competition, and other expenses directly relevant to business practices, or due to trade traditions, including provision of knowledge and understandings on a specific business.

**Donation and Contribution** means provision of financial support, free products or services to any party requesting for such support or donation. Its objective is to drive public contribution or promote the business and image of the Group.

**Political Aid** refers to offering assets and money as well as gifts, rights or other benefits to help, support or benefit political parties in any way. It also applies to politicians or any person whose duty involves politics or political activities, either directly or indirectly.

**Conflict of Interest** means any action that leads to oneself being involved or in conflict of interest with the Group, whether by engaging in communications with the Group's trade-related parties, or using opportunities or information obtained as an employee for personal gains. This includes business operations that are competitive with those of the Group or engagement in other work activities beyond those carried out for the Company which affect the responsibilities assigned.

**Facilitation Payment** means a small amount of expenses paid to a government official and is giving to ensure that government officials proceed with the process or to encourage faster action. The process does not require the discretion of government official, and it is an act with the duties of the government official of that state. This includes the right that the legal entity should have already such as applying for a license, requesting a certificate, obtaining public services, etc.

**Government Officials** mean persons holding a political position; government officials or local employees which have a permanent position or salary; employees or persons who work in a state enterprise or government agency, local administrative organization; and local council members who are not a person holding a political position; officials under the Local Administration Act; and shall include directors, subcommittees, employees of a government agency, state enterprise, or state agency; and individuals or groups which exercise authority or are assigned with the state administrative authority to carry out any act under the law, whether it is established in the government system, state enterprise or other state enterprises.

**Related Person** refers to spouses, children, parents, siblings or close relatives of Directors, Executives and Employees at all levels of Global Green Chemicals Public Company Limited and its subsidiaries.

**The Company** refers to Global Green Chemicals Public Company Limited.

**Subsidiary** refers to a company under the group of Global Green Chemicals Public Company Limited.

**Global Green Chemicals Group** refers to Global Green Chemicals Public Company Limited and its subsidiaries.

## Principle

Directors, executives, employees, contractors, as well as other parties contributing to the benefit of the Company are responsible to comply with the laws, rules, regulations on anti-corruption, and the Corporate Governance and Business Code of Conduct Handbook, policies, practices, and guidelines stipulated by the Company. They must discharge their duties with transparency, without engaging in any activity that may be considered fraud or corruption. They must not demand, proceed to, or tolerate any corruption to gain benefits of their own or those of relevant parties, including friends and acquaintances, and have to always be available and ready for performance assessment conducted by an authorized party or related agencies. In this regard, subsidiaries can apply the same policy and measures set forth by the Company as deemed appropriate.

## Measures and Operational Guidelines for the Company



1. The Company establishes an Anti-Corruption Committee, which is to be responsible for effectively enhancing the anti-corruption measures in accordance with the Company's declaration of intent to join the Thai Private Sector Collective Action Coalition Against Corruption (CAC).
2. The Company has implemented review, monitoring and amendment procedures to improve anti-corruption measures and reports the results to the Board of Directors regularly on a yearly basis. This is to evaluate efficiency, improve and develop the measures in response to the evolving corruption risks.

3. The Company conducts corruption risk assessment and has risk management measures in place, focusing on operational control, environmental control, and financial control.
4. The Group employs audit procedures in monitoring internal control system, in part that relates to financial documentation, accounting procedures and data storage with report procedures to ensure prompt and urgent reporting to high-rank executives and the Board of Directors.
5. The Company has political neutrality policy in which it will not provide any monetary, resource, or other material support, whether directly or indirectly, to any particular politician, or political party, or political group for the benefit of such politician, or political party, or political group.
6. The Company has no policy to pay facilitation payments in any form, either directly or indirectly, without taking any action or accepting any action in exchange for business facilitation.
7. The Company provides clear criteria for the procurement of government officials which are to ensure that such process is not against the No Gift Policy. Moreover, information related to the procurement of such government officials shall be disclosed to the general public for transparency.
8. The Company complies with the policies and personnel management procedures in terms of nomination and recruitment, performance assessment, compensation and promotion, which reflect its commitment in anti-corruption.
9. The Company shall not employ any demotion, punishment or any negative reinforcement against personnel who did not tolerate corruption, even though such action may lead to loss of business opportunities. Clear communication procedures are provided for the employees.

10. The Company regularly provides training on anti-corruption measures to enhance knowledge of its personnel.

11. The Company has communicated the Anti-Corruption Policy and Practices to its subsidiaries, affiliates, regulated companies, customers, suppliers, business partners, and stakeholders, as well as the general public, through several communication mechanisms for their acknowledgement and compliance with such Policy.

12. The Company has observed the Anti-Corruption Policy Guidelines on Accepting and Offering of Gifts, Hospitality, or Other Similar Forms of Reward (No Gift Policy) of Global Green Chemicals Group as a guide for its personnel and to ensure that the employees can perform to the best of their abilities.

13. The implementation of this policy shall be in accordance with the guidelines stipulated in the Corporate Governance and Business Code of Conduct Handbook, including rules, policies, regulations, requirements, and guidelines determined by the Company.

14. The Group shall undergo constant reviews of this policy every three years as to prepare its employees for joining the Thai Private Sector Collective Action Against Corruption (CAC), or within an appropriate timeframe in response to changes of applicable laws, rules, regulations. The revised policy will be proposed to the Board of Directors for approval.

## Penalty

1. The Group has appropriate punishment measures in place for noncompliance of directors, executives, and employees with the anti-corruption policy. The punishment includes redundancy for directors, or penalties based on the Disciplinary Procedures for Executives and Employees, and those in pursuit of laws, rules, or regulations, as well as the Corporate Governance in part related thereto.

2. In the case where any party related to the Group, or its customer, supplier, business partner fails to conform to the anti-corruption measures, the Group may consider terminating relationships with such relevant party, or customer, supplier, business partner.

### Guidelines for the Company's Personnel

1. Personnel at all levels must strictly comply with the Company's anti-corruption policy and processes. They must not engage in any form of fraud or corruption, either directly or indirectly.
2. Personnel at all levels must neither give nor accept bribes or any benefit in the same nature to and from officials of the government and private sectors, directly or indirectly, as incentives to influence or acquire illegitimate benefits.
3. Personnel at all levels must proceed carefully when carrying out any action that has corruption/fraud risks, especially:
  - 3.1 Giving and accepting gifts, receptions, welcome services or payments for related expenses must be done based on the Company's Corporate Governance & Business Code of Conduct Handbook, and Anti-Corruption Guideline on No Gift Policy.
  - 3.2 Financial donations and financial support are possible when done in the name of the Company and aimed at delivering public benefits, promoting businesses, or creating the good image of the Company or GGC Group. Such actions, when done, must be transparent and free from corruption. Also, they must fully comply with the Donations and Sponsorships for Public Relations Purposes Handbook of the Company and GGC Group.
  - 3.3 GGC Group's personnel at all levels must refrain from actions that involve conflict of interest. Actions taken by the personnel must be reasonable and done for GGC Group's interests. Aside, such actions must not violate applicable laws, rules, and regulations. If an action possibly constitutes a conflict of interest, a person involved must report it based on the Company's guideline and through designated channels.

3.4 Any business relation or procurements of the Company or GGC Group with government or private sectors, including any contact with the government sector, government official or any person related to the Company's or GGC Group's business operations, whether in Thailand or overseas, must be carried out in a transparent and honest manner in accordance with relevant laws.

3.5 The Company's policy of political neutrality supports political rights and freedom of each member of its personnel in line with laws. However, personnel should be aware that they must not take any action, conduct activities, or use the Company's and GGC Group's resources for political operations or activities in a way that endangers its political neutrality or damages it through political involvement or the giving of political support.

4. When hiring a person to represent or carry out work on behalf of the Company, relevant personnel shall inform that person of the Company's Business Code of Conduct related to anti-fraud and anti-corruption. Such hiring, moreover, must be done transparently, appropriately, and legally, and free from corruption or fraud.

5. The Company formulates whistleblower policy so as to set clear complaint receipt process and complaint review process. Personnel of the Company must neither ignore nor neglect any corruption practice involving GGC Group if they have witnessed. Personnel have the duty to report such practice to supervisor or a person in charge of the matter, or file a complaint with Whistleblower Channel, and provide cooperation to probes related to the complaints.

The Company shall ensure justice and protection for employees or persons providing tip-off or evidence of corruption/fraud practices related to the Company and GC Group, as well as employees who have refused to engage in corruption. Protection measures are provided to complainants or persons collaborating with fraud/corruption reporting based on its whistleblower policy.

**If you have any questions, please contact**

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