

Anti-Corruption Policy: 4th Revision

THE SIAM CEMENT PUBLIC COMPANY LIMITED

SCG conducts its business with integrity and is committed to responsibility towards society and all stakeholders in accordance with corporate governance principles, SCG Code of Conduct, as well as its stakeholder engagement policy and guidelines. Since 2012, SCG has become a member of Thailand's Private Sector Collective Action Coalition Against Corruption (CAC) to demonstrate its intent and determination to combat all forms of corruption.

In order to provide clear guidelines for business operations and develop the Company into an organization of sustainability, SCG has reviewed the previously issued Anti-corruption Policy and implemented this revised Anti-corruption Policy to ensure that SCG has in place a policy that defines responsibilities, guidelines, and appropriate operational requirements to prevent corruption in all of SCG's business activities and that all decisions on business operations potentially incurring risk of corruption are considered and executed with due circumspection.

Definition

"Conflicts of Interest" refer to a situation where an individual, in performing their duties in a position they are responsible for, has a situation that impacts the overall interests and/or those of SCG. This situation may lead to a lack of impartiality and transparency in decision-making of such individual.

"Corruption" refers to any form of bribery, whether in the form of offering, promising to give, giving, agreeing to give, requesting, or accepting money, assets, or other inappropriate benefits to or from government officers, government agencies, private entities, or individuals, whether directly or indirectly, in order that such person acts or refrains from acting in the exercise of his or her duties in a way that secures or retains business or recommends a specific business to SCG, or in a way that secures or retains other undue business advantages, unless such act is in accordance with the laws, local customs, or trade practices.

“Donation and Sponsorship” refer to giving and receiving of assets, services, or other benefits to or from individuals or entities for charitable purpose or public benefit, without expecting any return or commercial benefits from such activities, including supporting individuals or entities, which align with SCG’s policies and procedural guidelines.

“Employment of Government Officials or Revolving Door” refers to the movement of individuals from the public sector to employment in the private sector, which may give rise to corruption risks in terms of conflicts of interest for individuals who have roles in both sectors. Such situations may result in government officials performing their supervisory duties without impartiality.

“Facilitation Payment” refers to a small amount of money paid informally to government officials to ensure that they perform their duties or expedite routine administrative procedures that do not require the discretion of government officials and such procedures fall within the scope of the official's authorities and duties of which entities or individuals are entitled to receive services in accordance with the laws

“Gift and Hospitality” refer to asset, services, or other benefits.

“Government Official” refers to any individual currently or formerly serving as a public sector officer, political figure, or advisor to a government agency.

“Political Contribution” refers to giving of assets, services, or other benefits to assist, support, or otherwise provide advantages to political parties, politicians, individuals holding political office, or political activities, whether directly or indirectly.

“SCG” refers to The Siam Cement Public Company Limited and its subsidiaries.

“SCG Personnel” refers to directors, executives, and employees of SCG

“Subsidiary” refers to subsidiaries as defined in the consolidated financial statements of The Siam Cement Public Company Limited.

Anti-corruption Policy

SCG Personnel are prohibited from engaging in or accepting any form of Corruption, whether directly or indirectly. This shall apply to all businesses in every country and all agencies involved. Regularly reviews of compliance with this Anti-corruption Policy must be conducted. Relevant operational guidelines and requirements shall also be revised to ensure the alignment with changes in business, rules, regulations, and legal requirements.

Duties and Responsibilities

1. The Board of Directors is responsible for establishing an anti-corruption policy and putting in place effective anti-corruption systems in order to ensure that SCG Personnel recognize the significance of anti-corruption efforts and cultivate an anti-corruption mindset as part of SCG's organizational culture.

2. The Audit Committee is responsible for overseeing the presence of appropriate and sufficient Anti-corruption Policy for business operations and reviewing financial and accounting reporting systems, internal control systems, internal audit systems, and risk management systems to ensure their compliance with international standards as well as their prudence, suitability, currency, and effectiveness. The Audit Committee is also in charge of handling submission of information regarding corruption involving SCG Personnel, conducting fact-finding investigations, presenting the matter to the Board of Directors to determine disciplinary action or solutions, as well as giving consultation and ensuring compliance with this Anti-corruption Policy.

3. SCG's President, Management, and executives are responsible for implementing the Anti-corruption Policy by putting in place relevant systems and promoting the policy as well as communicating it to all employees and related parties. They are also in charge of reviewing the suitability of relevant systems and guidelines to ensure the alignment with changes in business, rules, regulations, and legal requirements.

4. The Internal Audit Director is responsible for reviewing risk assessment and offer recommendations on the formulation of corruption risk prevention procedures and approaches to present to the Audit Committee and the Board of Directors. The Internal Audit Director is also responsible for auditing and reviewing operations to ensure their compliance with policies, guidelines, authority, procedures, laws, and requirements of regulatory agencies and make certain that SCG's control systems are suitable, prudent, and sufficient for combating corruption and handling potential corruption risks. Outcomes of such audits and reviews shall be reported to the Audit Committee.

Anti-corruption Guidelines

1. SCG Personnel shall follow the Anti-corruption Policy and SCG Code of Conduct and avoid any direct or indirect involvement with Corruption.

2. SCG Personnel shall not neglect or fail to report relevant matters to their supervisors or designated responsible persons upon detecting an act involving SCG that can be construed as Corruption. It is their duty to give full cooperation in the fact-finding investigation of such incident. Should there be any inquiries or questions, they may consult their supervisors or persons designated to oversee compliance with SCG Code of Conduct through various channels provided.

3. SCG shall ensure fairness and provide protection to SCG Personnel who refuse to engage in Corruption or report Corruption cases related to SCG. No disciplinary action, demotion, or adverse consequence shall be imposed on such individuals, even if their actions result in the loss of SCG business opportunities through a protection procedure which is intended for those who follow the Anti-corruption Policy, file complaints, or cooperate in reporting corruption as defined in the Whistleblowing Policy.

4. SCG recognizes the importance of educating and fostering an understanding among third parties whose duties involve or may impact SCG on matters where compliance with the Anti-corruption Policy is required.

5. SCG strives to foster and maintain an organizational culture with zero tolerance against corruption in transactions with both public and private sectors.

6. SCG's Risk Management Committee is responsible for preemptively assessing potential corruption risks. The Internal Audit Office has put in place appropriate and efficient audit processes and internal control systems for processes, finance, accounting, record keeping, and others, which are subject to regular review.

7. SCG shall comply with laws related to anti-corruption in Thailand and every country where it conducts business.

8. SCG shall consider taking appropriate action to ensure that its agents, contract counterparties, or any person acting on behalf of SCG are informed of the principles set forth in this Policy.

Rules of Practice

1. This Anti-corruption Policy shall also apply to human resource processes, including nomination or selection, promotion, training, evaluation, and remuneration. Supervisors at all levels shall communicate the Policy to staff so that they can apply it to business activities within their scope of responsibility and supervise its implementation to ensure efficiency.

2. Any implementation of the Anti-corruption Policy shall be in compliance with guidelines set forth in SCG Code of Conduct, SCG Corporate Governance Principles, stakeholders engagement policy and guidelines, as well as relevant rules and operational handbooks, and additional guidelines to be formulated in the future

3. To ensure clarity regarding activities involving high risks of corruption, SCG Personnel shall exercise caution and comply with SCG Code of Conduct and guidelines as follows:

3.1 Gifts and Hospitality

The offering, giving, or acceptance of gifts and hospitality in connection with business-related parties shall comply with local customs and country-specific practices. Such exchanges must be of reasonable value and must not exert improper influence over business decisions. All activities shall conform to the standards outlined in SCG Code of Conduct.

3.2 Facilitation Payment

The Facilitation Payment to government officials, whether direct or indirect, is strictly prohibited.

3.3 Donations or Sponsorships

Any donation or Sponsorship must be made transparently, in accordance with applicable laws and regulations, and must not be intended to improperly influence or obtain business advantages. Donations or Sponsorships must not be used as a means of bribery or Corruption in any form.

3.4 Employment of Government Officials or Revolving Door

The Employment of Government Officials in any position that may lead to a conflict of interest or violate applicable laws and regulations is prohibited.

The recruitment of individuals who were formerly government officials to serve as directors or executives must comply with relevant laws and SCG's established principles, to ensure that such employment is not made in exchange for any improper favor or advantage. The recruitment process must be conducted with due consideration of necessity, justification, and in accordance with SCG's recruitment principles.

The names and backgrounds of appointed individuals directors or executives who were formerly government officials shall be disclosed in SCG's annual report for transparency purposes.

3.5 Business relations and procurement with public and private sectors.

Any offering or accepting of bribery is prohibited in all business activities. Any business dealings with public and private sectors must be carried out with transparency, honesty, and in compliance with all applicable laws and regulations.

3.6 Political Contributions

- (1) SCG maintains a neutral political stance and shall not engage in or support any political activities, whether through financial contributions or any other form of support to political parties, political coalitions, political figures, or candidates for political office, whether directly or indirectly, at the local, regional, or national level.
- (2) SCG Personnel shall strictly adhere to SCG Code of Conduct in relation to political activities.

3.7 Conflict of Interest

Employees shall perform their duties in compliance with applicable laws and ethical standards, and must avoid any actions that may create a conflict of interest which could affect their decision-making. All actions shall comply with the SCG Code of Conduct.

Communication and Training

1. SCG shall communicate and disseminate the Anti-corruption Policy to SCG Personnel through various channels, such as orientation for new directors and employees, training sessions or seminars, as well as internal public relations within SCG's workplaces and electronic systems. SCG shall also periodically communicate to SCG Personnel various forms of corruption, risks of being involved in Corruption, and how to submit information. This is to ensure that SCG Personnel acknowledge and implement the Policy.

2. SCG shall communicate and disseminate the Anti-corruption Policy as well as SCG's whistleblowing channels to the public, subsidiaries, associates, and stakeholders via various channels, such as websites, annual reports, and annual registration forms, to foster an understanding and support anti-corruption efforts.

3. SCG Personnel who have any inquiries about the Policy may consult their supervisors, secretary to the Audit Committee, or the Internal Audit Director.

Disciplinary Action

SCG Personnel who fail to comply with this policy is subject to disciplinary action in accordance with established corporate regulations. Where such conduct may also be subject to legal punishments according to the laws if their action is illegal.

Whistleblowing Measures and Channels

SCG has established mechanisms for whistleblowing, complaint handling, and the processing of cases related to violation of laws, rules, and SCG Code of Conduct or to behavior of SCG personnel that may be suspicious of corruption. SCG has also prescribed appropriate whistleblower protection measures according to the Whistleblowing Policy to provide a clear guideline and enhance the efficiency of complaint handling.

Revised and effective from 30 July 2025 onwards
According to the resolution of the Board Meeting on 30 July 2025

Air Chief Marshal

-signed-

(Satitpong Sukvimol)

Chairman of the Board of Directors

Note:

- * The first amendment to this Anti-Corruption Policy was made pursuant to the resolution of the Board of Directors Meeting No. 193 (6/2014) on October 29, 2014
- * The second amendment to this Anti-Corruption Policy was made pursuant to the resolution of the Board of Directors Meeting No. 245 (2/2021) on March 31, 2021
- * The third amendment to this Anti-Corruption Policy was made pursuant to the resolution of the Board of Directors Meeting No. 255 (4/2022) on May 25, 2022