

## Anti-Fraud and Corruption Policy Revision 2

The company is committed to conducting business correctly and transparently in every situation with the principles of good governance by being responsible to society and all groups of stakeholders with ethics and morality. The company has good corporate governance principles, ready to follow the related regulations of both the government and private sectors. Therefore, it is considered appropriate to make an announcement of "Anti-Fraud and Corruption Policy" as a clear guideline for conducting business. and develop the organization towards sustainability.

### **Anti-fraud and Corruption Policy:**

Company executives and employees are prohibited from performing or accepting corruption in all forms, directly or indirectly. It covers all businesses and all related departments.

To comply with this anti-fraud and corruption policy, there shall be regularly reviewed, as well as reviewing practice guidelines and operational requirements to be consistent with changes in business, rules, regulations, and legal requirements.

### **Policy Scope and Governance**

This policy applies to the business operations of Bangkok Synthetics Co., Ltd. in Mixed C4 derivatives and synthetic latex businesses and BST Elastomers Co., Ltd. in the synthetic rubber business covering all departments, executives, and employees at all levels, whereas.

1. This policy is governed and responsible by the Governance Steering Committee and be reviewed at least once a year.
2. The quantitative target of this policy is demonstrated in the Sustainable Development Policy (ESG Policy).

### **Definition:**

**Fraud** means any action to seek unlawful benefits for oneself or others, such as Asset Misappropriation Embezzlement Financial Statement Fraud Corruption, etc.

**Asset Misappropriation** means taking property that belongs to another person or is jointly owned by another person and dishonestly misappropriating that property to belong to oneself or a third person.

**Embezzlement** means defrauding others by expressing false information or concealing true information that should be dishonestly disclosed by such deception resulting in obtaining property from the deceived person or a third party or making the deceived person or person Third, make, withdraw or destroy any document of rights.

**Financial Statement Fraud** refers to the manipulation of accounting figures to take advantage of loopholes in accounting principles and alternatives in the measurement and disclosure of accounting information to change the information in financial statements. As desired for illegal purposes.

**Corruption** means bribery, regardless of form, by offering to promise to give, give, promise to give, demand, or receive money, property, or any other benefits which It is inappropriate for government officials. Government agencies, private agencies, or persons having duties, whether directly or indirectly, to allow such persons to perform or refrain from performing their duties to obtain, or maintain business, or recommend business to the company. specifically, or to obtain, or maintain any other benefits that are inappropriate for business, except in the case of local laws, regulations, announcements, regulations, customs and traditions or trade customs can be done.

**Policy guidelines:**

1. Executives and employees at all levels must comply with the anti-fraud and corruption policy and the company's Code of Conduct without getting involved in corruption and fraud whether directly or indirectly.
2. Employees must avoid actions that have a Conflict of Interest with the company. Any action must be reasonable based on actions for the benefit of the company and not contrary to the law, rules, and regulations. If there is any action or behavior that is considered to be a Conflict of Interest with the company, employees have a duty to report a Conflict of interest to their supervisors.
3. Employees must perform their duties with caution regarding receiving, giving gifts, or any other benefits, including entertainment, in accordance with regulations and in accordance with operational requirements.
4. Employees are prohibited from giving or receiving bribes, including any other benefits of a similar nature to government and private officials, both directly and indirectly, as an inducement. influence or to gain unlawful benefits.
5. Hiring any person to act on behalf of, or act on behalf of the company, the person involved must inform such person of business ethics in this matter and must ensure that the conditions of employment are transparent and appropriate, legal, and no fraud and corruption.
6. Charitable donations and financial support of the company must follow the inspection, approval, and review process, with clear documentation and in accordance with the company's regulations. This is to ensure that charitable donations and grants are not used as an excuse for fraud and corruption.
7. The company is aware of the importance of disseminating, providing knowledge and understanding to other people who must perform related duties, or may have an impact on the company in matters that must be complied with in accordance with this anti-fraud and corruption policy.
8. The Company is committed to creating and maintaining an organizational culture that adheres to corruption and corruption is unacceptable, both in transactions with the public and private sectors.

9. The Company will take reasonable steps to ensure that representatives of the contracting party or any person acting on behalf of the Company are aware of the principles of this policy.
10. Employees should not be negligent or negligent when they see actions that are considered fraud and corruption related to the company and notify their supervisors, or responsible persons, and cooperate in investigating various facts. If you have any doubts or inquiries, please consult with your supervisor or the person assigned to be responsible for monitoring compliance with the code of conduct through various channels specified.

**Additional Requirements:**

1. Any action according to the anti-fraud and corruption policy must use the guidelines as specified in the company's code of conducts, policies, and guidelines for different groups of stakeholders, including the relevant company manuals and regulations, as well as any other guidelines to be determined in the future.
2. This anti-fraud and corruption policy covers personnel management processes, from recruitment or selection of personnel, promotion, training, evaluation of employee performance, and compensation. By requiring supervisors at all levels to communicate and understand with employees for use in business activities under their responsibility and to supervise operations to be efficient.
3. For clarity in dealing with matters that have a high risk of fraud and corruption, company directors, executives, and employees at all levels must act with caution in the following matters.
  - 3.1 Gifts - Entertainment and Expenses, Giving, giving or receiving gifts, entertainment must not be intended to create an incentive to make any decision and should express a desire not to accept gifts or expenses. souvenir that has values that exceed normal values from those involved in the business.
  - 3.2 Charitable donations or financial support - Charitable donations or financial support must be transparent and legal, ensuring that the donation or financial support is not used as an excuse for bribery.
  - 3.3 Facilitation payments – Do not pay facilitation fees to government employees.
  - 3.4 Business and procurement relations with the government sector – Do not give or receive bribes in any type of business operation. Company operations and dealings with the government sector must be transparent, honest, and must carry out actions in accordance with relevant laws.
  - 3.5 Providing political assistance.
    - 3.5.1 The Company is politically neutral by not taking actions that are affiliated with or supporting financially or in any other form to political parties, political coalition groups,

political officials, or political election candidates, whether directly or indirectly, either at the local, regional or national level

3.5.2 Executives and employees must strictly abide by the company's code of conduct regarding political operations.

**Channels for Reporting Concerns or Complaints about Fraud and Corruption**  
**(Whistleblowing)**

The Company has established measures and channels for reporting concerns or complaints regarding fraud and corruption in Section 8, Work Regulations regarding the Company. It also consists of handling cases involving violations of laws, regulations, and corporate ethics, or behavior that may indicate fraud and corruption by executives and employees, including appropriate protection measures for those who raise concerns or complaints to have a clear guideline and allows for efficient receipt of complaints.

Announced on the date of 21<sup>st</sup> Dec 2023

Mr. Chatree Chuenchomsakun and Mr. Supachol Nithivasin

Managing Directors

**Revision 2:**

1. Clearly specify the policy scope, governance, and responsibility, specific the time for reviewing the policy, and specify policy target which are referenced in the Sustainable Development Policy (ESG Policy).
2. This policy is the announcement of Anti-Fraud and Corruption Policy according to announcement BST No. 57/2566 and BSTE No. 31/2566