



KIANG HUAT SEA GULL TRADING FROZEN FOOD PUBLIC COMPANY LIMITED
4/2 Village No. 3, Asia 43 Road, Na Mom Sub-district, Na Mom District, Songkhla Province 90310
Tel: 0-7422-2333, Fax: 0-7422-2300-1 www.kst-hatyai.com
Taxpayer ID No. 0107537002231

Anti-corruption policy

Kiang Huat Sea Gull Trading Frozen Food Public Company Limited (“Company”) adheres to business operations with honesty, integrity, transparency and fairness in accordance with the principles of good corporate governance and applicable laws. We do not tolerate any kinds of direct or indirect corruption, and the directors, executives and employees of the company are required to strictly comply with the anti-corruption policies.

Nevertheless, as a clear code of practice for operating businesses and developing the organization sustainably, the company thus reviews the “anti-corruption policy” that has been announced and applied to ensure that the company reviews responsibility, code of conduct and requirement for preventing any corrupted action in all business activities of the company.

Definition

“**Corruption**” means bribery in whatever form, grant, offer, promise for granting, assurance for granting, claim, or receipt of any money, property or other unjust interests to officers of the government, public authorities, private organizations, or any persons directly or indirectly in charge for those people to act or omit duty performance in order to obtain or maintain the business. It includes introduction of a business to a company or a branch office to obtain or maintain other interests inappropriate for business unless allowed by the local laws, rules, notifications, regulations, customs and traditions or trade customs.

“**Fraud**” means any action to seek inappropriate interests for one’s self or others.

“**Bribery**” means giving, offering, promising to give, receiving, requesting, or claiming interest that is incentive, property, money, gift, loan, reward, remuneration, entertainment, facilitating payment, payment for acquittal that is against morality, virtue, regulation, policy or law with a government official, private officer, or other persons doing a business with the company, directly or indirectly. This will make such person to perform or omit duty in order to obtain or maintain the business or unrighteous interests.

“**Company’s personnel**” mean directors, executives and employees of the company

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Mr. Worapol Prachaechu

Date : 24/10/2022



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“**Conflict of interest**” means the conflict of personal and public interest, which is a situation or action that a company’s director, executive and employee may have a personal interest affecting a decision or duty of performance in his/her position, and affecting public interest.

“**Facilitating payment**” means minor payment unofficially made to a government official to ensure that such government official will follow the process or to accelerate the action. Such process is not subject to discretion of a government official, and it is a righteous action of that government official. This includes rights a juristic person may normally have such as application for a license, application for a certification, and public services etc.

“**Political assistance**” means grant of property, money, return, right or other benefits to support or help or provide other interests to a political party, a politician, or a politically exposed person. This may be direct or indirect political support.

“**Government authority or government official**” means a bureaucrat, employee, officer and a group of persons working in an administration section, a committee or a person legally authorized to regulate a rule, directive or resolution with impacts on a person.

Scope

This policy shall be valid within Kiang Huat Sea Gull Trading Frozen Food Public Company Limited including the head office and the branch office.

Objective

To ensure that the company has a policy that defines suitable responsibility, code of practice and requirement of operation in order to prevent corruption with all business activities of the company, and to render a business-related decision and operation that may be at risk of corruption to be considered and treated cautiously.

Anti-corruption policy

The company does not tolerate any kind of corruption, directly or indirectly, which covers all related businesses. The compliance with this anti-corruption policy will be regularly verified, and the company’s personnel shall fully comply with the anti-corruption policy.

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Anti-corruption Code of Conduct

- 1) The company's personnel shall comply with the anti-corruption policy and the code of practice or other measures to be determined by the company. Violation or failure to comply is subject to disciplinary action and legal proceedings as the case may be.
- 2) The company has the risk management committee to assess anti-corruption risks that may occur, and it specifies a guideline for fraud and corruption risk assessment by systemizing the risk management (fraud risk assessment) in all kinds of action pertaining to fraud and corruption. This includes conflict of interest, bribery, illegal gratuities, and economic extortion and/ or other kinds at risk of fraud and corruption. Furthermore, a process for internal audit and control is provided for suitable and effective risk management.
- 3) The company's personnel shall take precautions about receiving or granting gifts, properties or services or entertainment according to the policy of giving or receiving gifts, Nevertheless, giving or receiving gifts and entertainment shall be in accordance with the business objectives or customs with reasonable value and without effect on decision regarding duty of performance.
- 4) Donation for charity or subsidy shall be legal and transparent to ensure that the donation for charity and sponsorship is not used as an excuse of corruption.
- 5) The company's personnel shall not neglect or ignore when detecting any action of potential corruption involved with the company by reporting to the commander or relevant person through a whistleblowing channel and cooperating in fact investigation process.
- 6) The whistleblower and/ or complainer may remain anonymous when realizing that such disclosure may prejudice or cause any damage to him/ her. In case of self-identification, the company will keep information and details of the whistleblower and/ or complainer confidential by disclosing only with those related to the fact investigation process. However, disclosing any information requires the company to thoroughly consider the case with recognition of safety and damage of the whistleblower and/ or relevant person.
- 7) The company shall bring fairness to and protect employees who refuse or inform corruption case related to the company by implementing a measure to protect complainers or cooperators in reporting fraud and corruption. There should not be demotion, punishment or adverse

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outcome with the employees who refuse corruption despite such action leading to loss of business opportunity of the company.

8) The company operates its businesses politically neutrally and provides political assistance without any acts that are oriented to or financially supportive or other kinds with a political party, political movement, politically exposed person or a candidate in any political election directly or indirectly at local, regional or national level. However, the company respects political right of employees in terms of voting, electing, or being a member of a political party.

9) Procurement of government official: the company will examine employment record of those who used to work in a government authority regarding any agreements made with the government authority, and whether it is in accordance with the company's criteria that they must not be or was not a government official unless being discharged for at least 2 years before application and recruitment as an employee. Nevertheless, this renders the company not to take any action for these people to break an agreement that may lead to further prosecution.

10) The company instructs personnel at all levels not to seek personal benefit from working nor to exploit an opportunity or internal data of the company to seek personal interest from duty performance that results in conflict of interest for themselves or others. They should keep trade secrets confidential and avoid any actions that lead to conflict of interest. They shall not operate a business that competes with the company or that has the same nature to realize the principle of business operation that is emphasized on highest benefit of the company.

Communication and training

The company communicates and publishes the anti-corruption policy to the company's personnel at head office and branch offices through different channels such as orientation for directors and newcomers, trainings or seminars, internal public relation and electronic propagation. This enable all related persons to comprehend patterns and risks from involvement with corruption and fraud and whistleblowing for employees to follow and practice.

Punishment

1) Punishment for company's directors in case of failure to follow the anti-corruption policy: The company will define punishment for directors who fail to comply with the anti-

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corruption policy with a measure of dismissal according to the requirement of good corporate governance related to fraud-corruption offence.

2) Punishment for executives and employees: in case of failure to comply with the anti-corruption policy, it is deemed that the executives and employees of the company commit a corruption and it is unethical in respect of the company's operation. They will be subject to punishment according to the requirement on disciplinary action for executives and employees. Furthermore, they may be taken legal proceedings if it is an illegal action.

3) In case of persons related to a consortium, or client, trade partner or business ally not complying with the anti-corruption policy, the company may consider not renewing a contract or terminating any transactions with the related persons or clients, trade partners, or business allies.

Whistleblowing or complaining channel

The company has a mechanism for whistleblowing and accepting a complaint and taking actions about an offence according to the laws, regulations and code of conduct of the company, or a behavior that is likely to be a fraud or corruption of employees. This includes a measure to protect whistleblowers as a good practice for managing complaints effectively. *

There are 2 whistleblowing channels as follows

1 The company's website <https://www.kst-hatyai.com> at "whistleblowing or complaint"

2. Notice sent to the chairman of the audit committee

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This policy is effective from the announcement on 16 August 2022 and onwards.

Signature

Dr. Surapon Arrykul

Committee chairman

-seal affixed-

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