

## **Anti-Corruption Policy**

Buriram Sugar Group has realized the importance of conducting business with honesty and responsibility for society and all stakeholders in line with the code of conduct, business ethics, and relevant regulations strictly. Then, Buriram Sugar Group has determined the anti-corruption policy, and communicated with directors, executives and employees to instill the understanding about the importance of the anti-corruption policy for the mutual and corporate actions.

The anti-corruption policy is a part of Good Corporate Governance & Code of Conduct Handbook of Buriram Sugar Group approved by the Board of Directors.

### **1. Objectives**

- 1.1 To show Buriram Sugar Group's intention to prevent all forms of corruption directly or indirectly.
- 1.2 To specify the responsibility, guidelines, and other criteria for directors, executives, and all employees to acknowledge and comply with in combating and preventing all corruptive activities strictly.
- 1.3 To build the reliability of customers, business partners or business alliances, and other related persons.

### **2. Definition**

Corruption means using power entrusted by duty to obtain benefit for oneself, or any fraudulent actions by using power entrusted by position, authority and influence to obtain benefit for oneself and others, or offering, giving, or promising for benefit, in form of money, things, and other returns, to persuade any persons to act illegally in contrary with good moral, or using money or things, which are authorized to operate in the governmental function, for the benefit of oneself, or other unrelated activities.

(Reference: Transparency International – TI, established since 1993)

### **3. Scope of work**

- 3.1 All employees covering directors, executives and employees must comply with this policy including other policies related to Good Corporate Governance & Code of Conduct Handbook of Buriram Sugar Group.
- 3.2 Buriram Sugar Group expects all customers, business partners or business alliances to cooperate with this compliance.

### **4. Role and Responsibility**

- 4.1 The Board of Directors is responsible for specifying the policy, and monitoring the compliance system on anti-corruption in an effective way to ensure that the management has recognized and prioritized the anti-corruption and cultivate it as an organizational culture.

- 4.2 The Audit Committee has the duty of reviewing financial and accounting reports, internal control system, internal audit system, and risk management to ensure that such operations are concise, appropriate, and efficient in compliance with the generally accepted accounting standards. Moreover, the policy and measures on anti-corruption must be supervised to ensure that Buriram Sugar Group performs its duties in line with laws, good corporate governance principles, and code of conduct.
- 4.3 The Chairman of the Board of Directors, the Board of Directors, and executives have to determine the system to encourage and support the anti-corruption policy to communicate with employees and other related persons, and review the suitability of the system and other measures in accordance with the change of business, regulations, articles of association, and applicable laws.
- 4.4 The internal audit office has the responsibility and duty to examine and audit the operations to be correct, in line with the policies, notifications, guidelines, regulations to ensure the control system is appropriate and sufficient to the corruption risks which are likely to occur, and report such results to the Audit Committee and the Board of Directors to acknowledge.
- 4.5 All employees have to comply with the policy and guidelines of anti-corruption strictly. They have to sign an acknowledgement letter and comply with this policy, and submit to Human Resources and Administration Department as evidence to ensure that all employees are notified, understand and ready to follow this policy. In case of any suspicious actions or any violations against this policy, this must be reported to their supervisors, or other whistle-blowing channels of Buriram Sugar Group. Thus, the whistle-blowing unit will keep this information secretly, and carefully send to the related department.

## **5. Operations**

- 5.1 Any operations according to the anti-corruption policy must comply with Good Corporate Governance & Code of Conduct Handbook of Buriram Sugar Group, policies and guidelines of all stakeholders, rules, related handbooks, and further guidelines.
- 5.2 This anti-corruption policy covers all relevant activities of Buriram Sugar Group by assigning supervisors at all levels to communicate with the employees to comply with the policy in any business activities entrusted by the responsibility, and supervise such operations efficiently.
- 5.3 It is to assess the corruption risks of the entire organization on a yearly basis.
- 5.4 In order to ensure the effective practices on this matter, directors, executives, and employees must act with carefulness upon the following issues;
  - 5.4.1 Gifts, gratuity, feast and additional expenses  
Granting, offering, or receiving gratuity, feast must be in compliance with good corporate governance principles, and code of conduct of Buriram Sugar Group.



5.4.2 Donation, charity or sponsorship

Granting, receiving donations or sponsorship must be done with transparency and legality, and make sure that such donation or sponsorship is not used for any excuses to accept a bribe. This issue must be in compliance with Good Corporate Governance & Code of Conduct Handbook.

5.4.3 Business relations and procurement

It is prohibited to give or receive a bribe in any business operations with all customers, business partners, governmental sectors, or other organizations dealing business with Buriram Sugar Group, which should be done with transparency, honesty, and legality.

This policy is effective from August 11, 2016 onwards.

Order at August 11, 2016.

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(Mr. Prachuab Chaiyasan)

Chairman of the Board of Directors