

Anti-fraud and Corruption Policy
Singha Estate Public Company Limited
(Extract)

Singha Estate Public Company Limited (“Company”) strives to conduct its business with integrity and transparency and in accordance with the laws in all relevant countries and business units. For this purpose, the Company encourages and stimulates to raise awareness and collective consciousness of the Company’s and subsidiaries’ directors, executives, employees at all levels for all forms of anti-fraud and corruption, an internal control system has been set to prevent the corruption or briberies (provision or acceptance) with the following practices:

- The Company’s personnel shall not offend or support in all forms of briberies, directly or indirectly.
- The Company’s personnel shall not engage in any act in a way manifesting intent in corruption or bribe provision or acceptance to/from public officials and private sectors or revilement stakeholders of the Company to acquire or maintain business or competitive advantages for personal benefits or relating persons.
- The Company’s personnel shall not perform or refuse to perform a duty or utilize authority from such position in an inappropriate way to gain improper benefits in different forms, such as requesting, receiving, offering, or providing any property or other benefits from/to public officials or the Company’s business parties.
- The Company’s personnel shall not neglect or ignore any act or suspicion deemed fraud and corruption. It is a duty to report such wrongdoings to the supervisor or person in charge in a timely manner through a designated channels as well as to cooperate in the case investigations.
- The Company shall arrange the fraud and corruption risks assessment on a regular basis including appropriate risk management procedures and report such assessment to the Risk Management Committee and the Board of Directors.
- The Company shall implement an internal control system covering finance, accounting, procurement, data recording, and other processes concerning fraud or corruption.
- The Company shall implement an internal inspection to ensure the effectiveness of the internal control system and risk assessment and compliance of the Company’s provisions, as well as audit and recommend each business unit to be in accordance to the Company’s policies, regulations and operating procedures to prevent fraud and corruption.

- The Company shall set up human resource management system reflecting the intention of the Anti-fraud and Corruption policy for personnel recruitment, performance assessment, remuneration, promotion and organization structure management.
- The Company shall communicate the policy and measures on anti-fraud and corruption as well as whistleblowing or reporting through methods and channels within the organization to build knowledge and understanding of the Company's personnel and comply with such policy, and communicate to the public, business partners to exhibit the Company's clear intention on anti-fraud and corruption.