



(Translation)

Anti-Corruption Policy

Saha Pathana Inter-Holding Public Company Limited

The Board of Directors of Saha Pathana Inter-Holding Company Limited has approved the resolution to sign a Declaration of Intent of Collective Action Coalition against Corruption enacted by Thai Private Sector on 14 January 2014. In order to be in compliance with the Company's Corporate Governance as well as corroborate its aims and Corporate Social Responsibility as a whole, the Company follows the policy relevant to laws countering corruption by prohibiting the Company Directors, Executives and Employees from accepting or supporting every type of corruption both in a direct and indirect manner, The policy is detailed as follows;

1. The Company will not be a party to pay bribes. In the case of contributions to charity, to political parties as well as offering gifts in a business manner, this must be transparent, explainable and audited.

2. Supporting enhancement of awareness and value for anti-corruption among the Company Directors, Executives and Employees to perform their duties in accordance with relevant laws, notifications and regulations by preparing a manual for guidelines.

3. The Company Directors, Executives and Employees must not act as an intermediary in demanding and accepting gifts or benefits from government sectors or private sector, which induces it to violate any laws. Moreover, it is illegal to use positions and/or duties to use the Company's data to seek benefits for themselves or others.

4. Setting the system to report financial status transparently and accurately, providing an efficient and effective internal control system and controlling a check-and-balance system to be appropriate in order to prevent conducting any fraud or taking part in any fraud and corruption.

5. Monitoring and reviewing the anti-corruption policy, guidelines and regulations consistently for the operation in order to adjust to business changes, laws and regulations.

6. Opening a channel for reporting any suspicious activities and ensuring that such reporters receive protection.

This Anti-Corruption Policy has been approved by the Board of Directors Meeting resolutions No. 11 (Board #21) on 12 March 2015 and effective since 13 March 2015.

Somkid Jatusripitak

(Mr. Somkid Jatusripitak)

Chairman