

## Announcement of the Board of Directors

No. 1/2563

**Subject: Anti-Corruption Policy**

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In order to be in compliance with the resolutions of the Board of Directors at the meeting No. 3/2020 dated May 15, 2020, the Company has issued an announcement regarding the anti-corruption policy to be regarded as the principles and guidelines as follows:

Civil Engineering Public Company Limited and its group companies (“**Company**”) value on operating the business with caution on corruption by adhering to the principles of good corporate governance for the best interests of shareholders, stakeholders, and those involved. Therefore, the anti-corruption policy has been established to be used as a guideline as follows:

1. Directors, executives, and employees of the Company must not engage in acts of corruption both directly and indirectly. This refers to an abuse of the gained power or a misuse of the acquired asset to obtain benefits for oneself or for others, which causes damage to benefit of others, such as offering, promising, requesting, demanding, soliciting, or accepting benefits, giving benefits, inducing unlawful acts, or destroying trust, or any other act of corruption for the benefit of oneself or others.
2. Directors, executives, and employees of the Company must comply with anti-corruption policies and measures and comply with the laws of Thailand against corruption. Failure to comply with this policy will be subject to disciplinary action and legal prosecution, as the case may be.
3. Directors, executives, and employees of the Company are responsible for monitoring and preventing corruption. If witnessing an act of corruption or acts that may lead to corruption, the incident must be notified or reported to the supervisor or responsible person immediately as stipulated in the Whistleblowing and Complaints Policy, as well as cooperating in the investigation of facts.
4. The whistleblowing channel has been set up in the Whistleblowing and Complaints Policy by promoting a variety of communication channels so that employees and stakeholders can report suspicions. In this regard, the Company shall keep the details of the whistleblower confidential. The whistleblower who acts with good intentions and honesty, including those who refuse to commit corruption, will be protected by the Company and will not be affected by their action, such as no punishment, demotion, transferring, or negative consequences.

5. The Company realizes the importance of building good business relationships with employers and business partners. This policy therefore does not prohibit any act that is transparent and is a part of the normal course of business permitted by law, regulation, local custom or commercial practice. This includes providing general entertainment, hospitality, giving or receiving of gifts on special occasions as appropriate and under reasonable act in accordance with the Code of Conduct. However, such actions must not be done in order to induce improper conduct, influence business decisions, or provide unfair benefits and one must always be aware that any action or non-action must be subject to transparency and accountability.

In the event of giving or accepting a gift, it should be of reasonable value, opportunity and tradition and done openly, not associated with a business commitment and should not be in a form of cash or cash equivalent. In cases of general entertainment or hospitality, it can be done as necessary and at a reasonable cost without being excessively extravagant or with excessive frequency.

6. The Company has a policy of being politically neutral and has no policy to assist in politics or act in favor of any party. However, the Company's directors, executives and employees have the freedom under the Constitution and relevant laws to participate in politics such as the exercise of voting rights and referendums. In this regard, directors, executives, and employees of the Company must not use Company assets, resources, or time to perform the Company's duties, render services on behalf of the Company, or refer to Company names in support of political activities or take any action that may lead to an understanding of the Company's involvement or support of any party.

7. Charitable donations and financial sponsorships must not be concealed or done as bribery and must be subject to a transparent consideration process and in accordance with applicable laws or regulations. There must be a request in writing of the purpose of the charitable donations and sponsorships along with other supporting documents submitted for an approval from the authority at each level. However, in the case of charitable donations, there must be no claim for compensation from the receiver.

8. Provide an adequate and appropriate internal control system to prevent corruption and operations that are not in accordance with the principles of good corporate governance.

9. Implement an assessment of corruption risks and appropriate anti-corruption measures.

10. Provide communication channels for employees and stakeholders to be aware of the anti-corruption policy and be able to report suspicions, complaints, and suggestions to the Company in order to investigate the facts in accordance with the process and take corrective actions.

11. Implement a development of personnel management system to create anti-corruption values and culture by communicating and disseminating knowledge to personnel to acknowledge and understand the anti-corruption policy as well as ethical practice guidelines.

12. Procurement must be carried out in a transparent manner that does not violate the laws, regulations, and procedures set forth by the Company as well as arrange for regular audits of procurement operations.

This policy requires a regular review at least once a year or when there is a change in situations.

From the date of May 15, 2020, onwards.

Announced on May 15, 2020

(Signed)

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( Mr. Chaiwat Utaiwan )

Chairman of the Board