

## Anti-Corruption

Our company is committed to upholding the highest standards of corporate governance, fostering a culture of honesty and integrity that reflects our core organizational value of Integrity. We believe in doing what is right, maintaining strong ethical principles and moral standards, while ensuring good corporate governance practices throughout our operations.

We empower our people to work with responsibility, honesty, and trustworthiness—both toward themselves and others. Transparency and accountability are at the heart of everything we do. We take a firm stance against fraud and corruption in all its forms.

Our governance structure begins at the executive level, with our Audit Committee establishing policies and overseeing the implementation of anti-corruption measures across the organization. Our operational teams work diligently to promote awareness and cultivate an anti-corruption culture through:

- Clear communication of policies, regulations, and guidelines
- Regular engagement through multiple company channels
- Ensuring all employees and stakeholders understand and comply with our standards

Anti-fraud and corruption policy:

<https://www.civilengineering.co.th/storage/content/cg/document-download/20211203-civil-anti-corruption-policy-en.pdf>

Whistleblowing Policy:

<https://www.civilengineering.co.th/storage/content/cg/document-download/20240531-civil-it-whistleblowing-policy-th.pdf>

## **Anti-Corruption Measures**

The company maintains a zero-tolerance policy toward bribery and corruption, implementing comprehensive proactive measures to prevent and mitigate corruption risks. Our approach encompasses systematic risk assessment covering both internal and external factors, the development of robust governance mechanisms, mandatory training programs to ensure all employees understand and comply with proper practices, establishment of secure whistleblowing channels, and ongoing monitoring and verification processes.

### **1. Corruption Risk Assessment**

The company systematically conducts bribery and corruption risk assessments annually with full coverage across all operations and business units. Our comprehensive assessment process evaluates both internal risks and external exposures to ensure no area of potential vulnerability is overlooked. Internal risk assessment covers all risk areas including procurement processes, government project bidding, budget management, and document approval procedures. The company conducts thorough evaluation of internal controls, segregation of duties, and operational procedures to identify potential weaknesses. Assessment results are regularly reviewed and updated to ensure risk mitigation measures remain effective and appropriate to evolving circumstances.

For external risks, the company performs due diligence for all business partners, agents, and subcontractors. This includes annual risk assessments of existing business partners and mandatory pre-contract screening of all new partners prior to contract execution or commencement of collaboration. Enhanced due diligence procedures are applied to partners operating in high-risk jurisdictions or sectors, ensuring that the company maintains appropriate oversight of all business relationships that could pose corruption risks.

Following each assessment cycle, results are analyzed and utilized to develop targeted prevention plans, enhance control measures, and adjust risk mitigation strategies to address identified vulnerabilities. This systematic approach ensures that the company's anti-corruption

framework remains robust and responsive to both internal changes and external developments in the business environment.

## 2. Governance Structure

The company's anti-corruption governance structure establishes clear accountability and oversight at the highest levels of the organization. Board oversight is exercised through the Audit Committee, which has designated responsibility for supervising all anti-corruption efforts in accordance with [the Audit Committee and Risk Management Manual](#), Sections 5.7 to 5.15. This structure ensures that anti-corruption matters receive appropriate attention and resources from senior leadership.

The Audit Committee conducts quarterly monitoring meetings to review anti-corruption performance, assess the effectiveness of existing controls, and provide guidance on policy implementation. Through this independent oversight mechanism, the Committee ensures that operations comply with good governance principles, maintain transparency, and remain fully accountable to stakeholders.

At the operational level, dedicated units are responsible for implementing anti-corruption policies and driving the company's ethical culture throughout the organization. These units are tasked with disseminating policies to all employees and stakeholders, monitoring compliance with established standards and procedures, and fostering an organizational culture firmly rooted in integrity. The company recognizes that effective anti-corruption programs require engagement at all levels and therefore provides opportunities for all employees to participate actively in risk monitoring and prevention throughout every stage of operations.

## 3. Training and Communication

The company has developed a comprehensive guidance document, "Civil Blueprint: Core Values, Code of Conduct, and Guidelines for Our Shared Future" that serves as the foundational framework for ethical conduct throughout the organization. This document articulates the company's commitment to integrity and provides clear guidance on expected

behavior and decision-making processes when employees encounter potentially problematic situations.

Mandatory annual training is provided to all employees at every level of the organization, ensuring that everyone from executive level and senior management to operational staff receives appropriate instruction on anti-corruption policies and practices. The training program includes assessment testing to verify comprehension and retention of key concepts, forming an essential component of the company's Proactive and Preventive System for building and maintaining ethical standards.

Beyond internal training, the company actively communicates its anti-corruption stance and expectations to external stakeholders. Business partners, suppliers, contractors, and other stakeholders receive clear communication regarding the company's zero-tolerance policy toward corruption through multiple channels including the company website, direct communications, contractual requirements incorporated into supplier agreements, and regular stakeholder engagement sessions. This broad communication strategy ensures that everyone involved with the company understands and shares their commitment to ethical business practices.

Whistleblower Channel:

<https://www.civilengineering.co.th/en/corporate-governance/anti-corruption-and-whistleblower-channel>

The company has set the following anti-corruption targets:

- Zero tolerance: No corruption-related complaints or incidents
- 100% training coverage: All employees trained and passed the test annually on anti-corruption policies
- 100% partner screening: All business partners assessed for corruption risk