





Grants provided with the genuine intention to enhance the reputation of Siam Global Engineering Co. Ltd, the practice of healthcare or medical research are permissible only if given to reputable institutions or associations, and if given openly and unconditionally, i.e. without the expectation of any direct or immediate business return.

#### **9. Charitable donations and cultural contributions**

Charitable donations and cultural contributions shall not be used as a subterfuge for bribery. They shall not be provided to any organization upon the suggestion of a public official or for the purpose of influencing a public official. They must be justified by a legitimate charitable or cultural purpose.

#### **10. Political donations and contributions**

Contributions to election campaigns or legislative campaigns shall be the exception. If given, they have to be given openly and in strict compliance with the applicable laws.

#### **11. Facilitation payments**

Facilitation payments are small payments made to secure or expedite the performance of a routine action by a government official or agency (e.g. issuing licenses or permits, installation of a telephone line, processing goods through customs, etc.) to which the payer (or the company) has legal or other entitlement. Commonly, facilitation payments are extorted by underpaid officials.

Facilitation payments shall not be given by any Siam Global Engineering Co. Ltd associate in any country.

#### **12. Gifts and hospitality**

Courtesy gifts and hospitality shall not be given in cash. They do not constitute a bribe if made openly and unconditionally as a gesture of esteem and goodwill, provided that they are not made as a “quid pro quo”, or to obtain or retain business, and provided they are not prohibited by law. They shall be of modest value and shall not exceed the limits established by law and policy.

#### **13. Exceptions**

For all activities not relating to a Divisional business, exceptions may be granted by Corporate Integrity & Compliance together with Commercial Legal.

Exceptions will be reported annually to the Audit and Compliance Committee by Corporate Integrity & Compliance and Commercial Legal.



- ▶ GENERAL CIVIL CONTRACTOR.
- ▶ STRUCTURAL STEEL/FAB/DESIGN.
- ▶ MATERIAL HANDLING/FAB/DESIGN.
- ▶ ROLL FORMING MACHINE DESIGN.
- ▶ EXPANSION JOINT MANUFACTURER.

## 14. Entry into force and implementation

This guideline enters into force as of April 29, 2021 replacing the version of August 8, 2010. It shall be implemented by all Siam Global Engineering Co. Ltd affiliates subject to local legal considerations.

The owner of this guideline is Commercial Legal.

**Siam Global Engineering Co.,Ltd.**

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Apilas Suriyavanagul

29/04/2021

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