

Anti-Corruption

Prevention Policy Relating to Anti-Corruption Matters

Thaioil establishes and enforces through all the organization an explicit "Anti-Corruption Policy" comprising of definitions, responsibilities, implementations, and measures within Anti-Corruption Measures Handbook. The Board approved on May 10, 2018 which is an ISO 9001:2015 certified document. The Board, executives, employees, subsidiaries, joint ventures, other companies that control and agents (if any), are required to acknowledge and comply with this policy.

Define Anti-Corruption Policy an explicit, all the Board, executives, employees, subsidiaries, joint ventures, and other entities that may have a control over including agents (if any), prohibited or commit or accept any kind of corruption at all means. For direct and indirect benefits to personal and relevant parties neither one is a receiver or a giver or an offer of bribe both monetary and non-monetary to the government or private, and partners that HARN exercise business.

HARN is uncompromisingly committed to anti-corruption, demonstrated by its membership of the Thai Private Sector Collective Action Coalition against Corruption (CAC) since 2017. It operates based on good governance, code of conduct and ethics in conducting business, with responsibility to the community, society, environment and all stakeholders throughout the supply chain. In this case, to show our true commitment to doing so, the Board of Directors issues the policy and guidelines against corruption for directors, management and staff to strictly adhere to.

- Declaration of intention to join Thailand Private Sector Collective Action Coalition against Corruption (CAC) on March 21, 2017.
- Underwent the certification process and became a certified member CAC with effect from November 5, 2018.
- Applied for CAC recertification and won approval, with effect from September 30, 2021.

To be in accordance with the latest anti-corruption policy HARN adopted, HARN provides guidelines for overseeing the compliance with anti-corruption practices as follows:

1. Assign directors management and staff to assess the compliance with corporate governance policies and principles, business ethics and the Anti-Corruption Measures Manual every year.
2. Follow up to regularly review and improve the anti-corruption policy every year in order to ensure that HARN's operations comply with changes in business, regulations and relevant legal requirements. It must be presented to the Audit Committee and reported to the Board of Directors on a quarterly basis.
3. Assign the Quality System Management Department to inspect and monitor the implementation of anti-corruption policy measures by various departments through internal quality audits and report to the Chief Operating Officer, Chief Financial Officer, and the management review meeting every month by presenting to the Risk Management Committee. It must be reported to Board of Directors on a quarterly basis.
4. If from information from the audit or complaints found by the investigation there is reasonable evidence to believe that there are transactions or actions that may have a significant impact on the financial status and HARN's performance, including any breach of the law, the Code of Business Conduct/Ethics, guidelines for corruption prevention, or questions about financial report or internal control system, the Audit Committee will report to the Board of Directors in order to take corrective action within the period the Audit Committee deems appropriate. An investigation will be conducted without disclosing the whistleblower's name in order to protect the potential impact on the whistleblowers of the complaint or allegation.

Furthermore, the Boards review policies suitability and Anti-corruption Measures on March 23, 2022, was no significant change, remains consistent and suitable for changes of the business environment, rules, regulations, and the provision of laws.

Performance

1. Assessed operational risks, compliance with laws, safety, health and environment, corporate reputation and corruption covering all parties involved. The risk control results were reported to the Risk Management Committee, Audit Committee and the Board every quarter. The results of the risk assessment of corruption and unethical actions in use of Inside Information, conflict of interest and ethics of the Board, Executives and Employees were at a satisfactory level without any wrongdoing found.

2. Communicate policies good corporate governance, code of conduct, measures anti-corruption, prevention of conflict of interest and prevention use of Inside Information to the Board, Executives and all employees which counts as 100% through e-mail, Intranet and Digital Signet to cultivate awareness and promote transparent, fair and verifiable operation behavior.

3. Organized internal training on Corporate Governance Policy and Principles, Code of Conduct and Anti-Corruption for new employees, including requiring a knowledge test. There were 36 employees in total who attended the training and passed the tests at 100%.

4. Organized E-Learning in the HARN Academy system as a learning medium on the good corporate governance, code of conduct, Anti-Corruption, prevention of conflict of interest and prevention use of Inside Information by yourself to knowledge for directors, executives and all employees in all areas thoroughly to cultivate and raise awareness, including requiring the comprehension test through online tests. There summary were 8 out of 8 directors who passed the tests, representing 100%, and 5 out of 5 executive who passed the tests, representing 100%, 232 out of 241 employees who passed the tests, representing 96.26%.

Whistleblowing

The Board provide process and channels for complaints and whistleblowing and/or all forms of all complaints of all stakeholders through

However, once the chairman of the Audit Committee receives a clue, or the company secretary, investor relations, digital organization department or any other channels receive clues and complaints from the stakeholders of HARN, a preliminary consideration will be made regarding the category of which the matter of the complaint received falls into. The cases will be collected to present to the sub-committees or related directors and all suggestions and issues will be summarized to present to the Board of Directors quarterly. Except for complaints and whistleblowing directly sent to the chairman of the Audit Committee, the chairman of the Audit Committee will personally open those letters.

For employee complaints or suggestions, HARN has a process for dealing with such by considering whether the employee's complaint is a matter that may be an offense and at what level in order to determine the penalties for the action with fairness and accuracy. To build confidence in the measures to protect and maintain the confidentiality of complainants, employees can complain and express opinions through a variety of channels such as through a comment box, LINE Official account of HARN, or direct notification via e-mail to the Human Resources Department. All employees are obligated to acknowledge the available complaint channels since their orientation as new employees.

Actions when receiving complaints and reporting clues

The Audit Committee will consider the complaints received and inform the relevant authorities in order to investigate the facts of the complaints and take appropriate corrective action. The Audit Committee will periodically monitor the progress. The relevant departments will notify the results within a reasonable period of time to the complainants. The Audit Committee will report to the Board of Directors.

Protection Measures Complainants and Whistleblowers

In order to protect the rights of whistleblowers with good intention, HARN will not disclose names, addresses or any other information that can identify the complainant or the whistleblower and keep the information of the complainant and whistleblower confidential. Only those responsible for the investigation of complaints will have access to such information. In this regard, the person receiving information from performing duties related to complaints have a duty to maintain information, complaints, clues and documentary evidence of the complainant and whistleblower confidential. No information is to be disclosed to any other person who does not have a relevant duty unless it is a disclosure in accordance with the duty required by laws.

Assigned by the Board of Directors, the Audit Committee acts as the main contact point for reporting incidents and clues, following up on incident reports, protecting and providing fairness to complainants or those who provide clues related to corruption within the organization, and reporting the results of the investigation and punishment to the Board of Directors. In 2022, there were no cases of fraud or violations of HARN regulations. In addition, it communicate acknowledged to all Board, Executives and Employees to the Good Corporate Governance, Code of Conduct and Anti-Corruption Measures o prevent complaints/ whistleblowing.

Whistle Blowing Statistics and Complaints

		Reporting	Checking	Close Complaint
1.	ethics	0	0	0
	- corruption	0	0	0
	- Conflicts of Interest	0	0	0
	- Compliance with regulations	0	0	0
2.	Environment, occupational health and safety	0	0	0
3.	Society and community & public relations	0	0	0