



บริษัท สหกิจบรรจุภัณฑ์ จำกัด
SAHAKIJ PACKAGING COMPANY LIMITED

30/32 หมู่ 1 ซอย S1/2 ตำบลโคกขาม อำเภอเมืองสมุทรสาคร จังหวัดสมุทรสาคร 74000
30/32 M.1 Soi S1/2, Kohk Kham, Muang Samutsakhon, Samutsakhon 74000



มาตรฐานคุณภาพ ISO 9001 : 2008

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Subject: Anti-Corruption policy and ask for cooperation to attend project

Dear: _____

Sahakij Packaging Company Limited determines to run our business with moral, explicit, honest and fair under laws and good manufacturing control for benefits of stakeholders. So company attend to project 'Collective Action Coalition against Corruption' to show intention and commitment to Anti all type of corruption. Company defines Anti-Corruption policy and as attachment.

To run Anti-Corruption Policy and implement with maximum efficiency, we would like to ask your cooperation to attend this project to run the business with honest and fair to get the most out of policy

Acknowledgement and acceptance

As representative of company authorization person, I have fully read and understand in Sahakij Packaging's Anti-Corruption policy. I appreciate to attend the project and will run business with Anti-Corruption policy together, for benefits between our organizations.

Supplier name _____

Address _____

Representative's Name _____

Job position _____

Signature _____

Date _____

Company's seal



Anti-Corruption policy

Sahakij Packaging Company Limited "Company" determines to run our business with moral, explicit, honest and fair under laws and good manufacturing control for benefits of stakeholders. So company attend to project 'Collective Action Coalition against Corruption' to show intention and commitment to Anti all type of corruption. Company defines Anti-Corruption policy and method of operation to run our business as below:

1. Definition of Corruption

'Corruption' is implementation or ignores duties or use power of job position to seek benefits that improper. Whether it be request or give bribery, promise, offer the benefits, request for money, accesses or other benefits to government, private company or the persons who run or concern with business. To get advantage of business implementation except laws, regulations or requirement provide to do.

2. Policy and method of operation to Anti-Corruption

Company denies for all type of Corruption. Board of Director, executive and all of employee must operate the job as Anti-Corruption policy and do not be the part of corruption as detail below:

- 1) Do not corruption or show intend to all type of corruption, whether it be give or request bribery to government staff, private company or persons who concern with. To get an advantage of business implementation for self and other people.
- 2) Do not ignore or negligent if found the action that show or be within the scope of corruption about company. If anyone found that action, must inform to supervisor or concerned person including participate to investigation for fact. Company defines this for duty that all employee should do.
- 3) Company will give fair treatment and protect corruption denier or corruption informant who inform about corruption to company as Corruption Informant measure
- 4) After finished to investigate about corruption and got the fact that real corruption, the person who corruption or concern with will get punishment as company regulation including national laws if that corruption is out of law

- 5) Company conduct Human Resource Management strategy to show determination to implement as policy and measure of Anti-Corruption, whether recruitment process, performance evaluation process, position promoted, training and development to improve knowledge in corruption to all persons in organization
- 6) Company set appropriate internal control system with efficiency including have plan to internal audit to protect corruption in organization

3. Protective Measure of high risk of corruption implementation

To be clear of implementation, Board of director, executive and all employees must operate the job with carefully in high risk of corruption process to government, private company and all concerned as topics below:

3.1 Political Contribution

Political Contribution is the action to support money or other to political party, politician or the candidates of politician to support politics activities such as give service or valuable, advertise or promote political party, buy ticket to enter activity of political party. Company has protective measure of Political Contribution as

- 1) Company has policy to neutral in political. Company will not support any political party including will not direct or indirect support to any politicians or candidates of politician
- 2) Board of director, executive and all employees can join or support political party in personal type under Thai law but do not mention Company to run political activity or use company access, equipment or any tools of company for benefit of political activities. Must spend out of working time to join activity and must carefully to do anything that can make the other person misunderstand about company

3.2 Donation

To support money, access or other thing to someone is the definition of Donation. Director, executive and all Sahakij employees can donate for someone to be the part of Corporate Social Responsibility (CSR) activities or improve organization's image but must operates as company regulations and policies and need authorization of authorize person.

3.3 Sponsorship

To support money, access or other thing to any activity or any project implementation is definition of Sponsorship. Director, executive and all Sahakij employees can do it but must implement with carefully and clearly process as company regulation in the name of 'Sahakij' only. (Do not sponsors with Employee's name)

3.4 Gift and entertainment

Gift is the valuable things that give or receive from business relationship during festival or important times as culture or traditional. Entertainment is the expense of welcoming party, traveling that give or receive from staff or person who support the business relationship during festival or important time or culture and traditional. Company understands about business relationship with Anti-Corruption, so company conduct Anti-corruption of gift and entertainment policy as below

- 1) Director, executive and all employees will not request for gift or any benefit from affiliate business partners
- 2) In the case that affiliate or business partner would like to give a gift or any benefit in any significant opportunity, tradition or culture for company, receiver must notify the supervisor immediately and will have to report to human resources department. To be used as gifts or prizes in the company's activities, as appropriate. The following, gifts or any benefits must not over 3,000 baht (three thousand) and do not give cash or cash equivalents such as gift cards, etc. to company
- 3) Director, executives and all company's staff can give gifts and business entertainment. If the conditions are met all of the following:
 - 3.1) Do not behave as inducement or any return to anyone for business advantage without appropriate.
 - 3.2) Compliance with national laws, rules and regulations of the company.
 - 3.3) Give the gift in the name of company, do not give in the name of employee.
 - 3.4) Categories and value of gifts are appropriate and valid according to time and place, such as give the gift or entertainment to agencies or business partners during the prize contest.

3.5 Procurement Process

Procurement is the process that has high risk because it is a process that among in competition for advantage by offering or request to receive benefits from both side of process, the company intent to remove risk in the procurement process to achieve fairness and transparency, as well as corruption-free, thus defining the process of the procurement as follows:

- 1) All products or service must have quotation from vendors or service providers at least 3 which may recruit from purchasing department only or a person who are user. But all vendors who attend the entire quotation must not a person who recruits by user only.
- 2) In the case of a bid from a vendor that came from purchasing staff and user. Those bids must be transparent. Purchasing staff must collect information about a product or service, including the price in a secret. Do not inform to others for fairness in the procurement process.

- 3) Process of negotiations or any agreement in the procurement must contain those negotiations of both sides not less than three persons. May consist of a purchasing staff and user of product or service by negotiation. The company staff has a duty to inform in detail in the Anti-corruption policy to supplier including the sign acknowledge with witnesses.

4. Way to get clues or corruption complaints

The company determined the channel to receive clues or complaint about corruption acts, or acts that imply to the corruption of the director, executive and employees by establishing a channel to facilitate both of internal and external person or business partners to clues and complaint. The complainant shall specify the details of clues or complaint with evidence (if available). Indicate the name, address and contact phone number to the channel as following

- 1) Via postal mail to Company President or President of corruption audit committee
Sahakij Packaging Company Limited 30/32 M.1 Soi S1/2 Khokkham, Muangsamutsakhon, Samutsakhon
- 2) Via E-mail
 - 2.1) Board of director: ito@spack.co.th
 - 2.2) President of Corruption Audit Committee: nannapus@sahakij.co.th
- 3) Company's suggestion box

For the clues or complaints about director or executive. We suggest you to submit your complaint direct to President of the Corruption Audit Committee. (nannapus@sahakij.co.th)

5. Fair and the protection measure of informants from corruption

The company will provide fair treatment and protection from corruption to persons who denied corruption or inform clues or complaint about corruption to company. To make sure that not in any way affect to informant, the detail as following

- 1) The company will keep the information of informants to corruption, including name, address, or any information to confidential. Only persons who have the responsibility to investigate can access to protect informant right. Such measures take effect, covering at all levels of staff including director and executive.
- 2) The company will act to protect informants and denied corruption person. Avoid the dangerous ability suffered instability or negative consequences to those complaints.

- 3) The responsible person of receiving complaints has a duty to retain information of complaints or any documents and evidence of informants confidential, prohibit any disclosures to the other except disclosures information as laws.

6. Penalties for acts of corruption

If we can prove any person obviously corruption acts. Whether director, executive or any employees. The company considered that misconduct policies against corruption and company regulations, must be punished according to the rules defined by the company. If that corruption is illegal, the culprit may have to blame as legal.

The company has no policy to reduce the position, punishment or result in a negative way to the person who rejected corruption. Even though it will cause the company to lose business opportunities

7. Training and Communication

To ensure that all employees and relevant in all sectors understand the anti-corruption policies of the company. Company set the way of training and communications. As follows:

- 1) Conduct Anti-Corruption training for new employee and refreshing training for all employees every year.
- 2) Company communicates Anti-Corruption policy and way to complaint corruption to all employees through company channel such as email, brochure, bulletin board and company website.
- 3) Company communicates Anti-Corruption policy and way to complaint corruption to public, business partner and stakeholders through company channel such as company website, annual report to make all of stakeholders to understand and implement in the same way of company

Announcement date is on November 26, 2018



(Mr. Yutaka Ito)

Board of Director