



SANKO DIECASTING (THAILAND) PUBLIC COMPANY LIMITED.

บริษัท ซังโกะ ไดคาสติง (ประเทศไทย) จำกัด (มหาชน)

Factory : Rojana Industrial Park Rayong , 3/14 Moo 2, T. Nongbua A. Nongbua Rayong 21120

Tel : 033-01070-5 Fax : 033-010706-8

Anti-Corruption Policy

Sanko Diecasting (Thailand) Public Company Limited operates under the principle of good corporate governance and has designed anti-corruption policies to combat all forms of corruption that may arise from the work and from contacting stakeholders or those relating to the Company. The Company indicates that the Directors, Executives and the staff must strictly uphold this policy. In 2016, the Company displayed its clear intention to the public by becoming part of the 'Thailand's Private Sector Collective Action Coalition against Corruption Council'

Definitions from the Anti-corruption Policy : Corruption means all forms of bribery by offering, promising, requesting or receiving of money or assets or any other inappropriate benefits to the government officials, states or private organizations or to any persons directly or indirectly, in order for the said person to act or refrain from acting their duty and gain business benefits or recommendation specifically to the Company or to gain undesirable business benefits, unless otherwise allowed to do so by the law, rules, regulations, social customs or business ethics.

Anti-corruption Policy

The Directors, Executives and the Company's staffs are forbidden from initiating or accepting any forms of corruption both directly and indirectly by covering all of the Company's business in all countries and all relating organizations. The anti-corruption policy will be frequently inspected, followed and will also be revised to better suit the changing nature of the economy, politics and the business society including the rules, regulations and the terms indicated by the laws.

Responsibilities

- (1) The Board of the Directors is responsible for setting up the policies and provide adequate and efficient anti-corruption support system, so that the management is aware of the importance of the anti-corruption policy and further develop into the Organizational culture.
- (2) The audit committee is responsible for inspecting the financial and accounting report system, internal control system, internal audit system and other procedures relating to the anti-corruption measures so that the system runs efficiently and according to the standards.
- (3) The Executives are responsible for setting up and support the system for the anti-corruption policy in order to communicate with the staffs and all relating personnel, including revising the suitability of the system and all protocols to better adapt with the change in the business, regulations and the laws.
- (4) The internal audit committee is responsible for inspecting and following up with the practice so that the procedures are carried out according to the policy, guidelines, regulations and the laws of the management, in order to be confident with the appropriate control system to prevent the corruption and report directly to the audit committee.

Procedure Guidelines

(1) The Board of Directors, Executives and all levels of the Company's staffs must follow the anti-corruption policy and the Company's ethics by not involving themselves with corruption both directly and indirectly.

(2) The Company's staffs must not ignore or neglect any corruptions that involve the Company. The staffs must report the incident to the person in command or any responsible personnel and fully cooperate with the investigation. If there are any questions or inquiries, consult with the person in command or the responsible person regarding the Company's ethics through the various channels provided by the Company.

(3) The Company will protect the staffs who refuses the corruptions or reports the corruptions which relates to the Company by undergoing the whistle blower protection measures or the staffs who cooperate with the Company in reporting the incident, as indicated under the whistle blower policy.

(4) Staffs who engage in corruption are considered violating the Company's ethics and will receive disciplinary actions as indicated by the Company. Furthermore, they may face legal charges if the said action is against the law.

(5) The Company is aware of the importance of the disclosure and the communication between the trade partners and all of the Company's stakeholders or those who may affect the Company, regarding the practice of the anti-corruption policy.

(6) The Company strives to create and safeguard the Organizational culture that rejects corruptions either to the private sector or to the public sector.

Terms of Procedures

(1) Any actions following the anti-corruption policy must follow the guidelines as indicated in the Company's ethic manual, regulations and all Company relating guidelines including any other guidelines that may be introduced further by the Company.

(2) For the sake of transparency regarding corruption incidents with high risks, the Board of the Directors, Executives and the Company's staffs at all levels must proceed with caution in the following issues;

(2.1) **Gifts** - Meals and any expenses for giving presents or receiving of gifts must be in accordance with the Company's ethic and the policy regarding giving gifts, assets and any other Company's benefits.

(2.2) **Donations or sponsors** – Giving or receiving donations or sponsors must be transparent and under the law by making sure that the donation or sponsoring money is not used as an excuse for bribery.

(2.3) **Business relation and subcontracting with the public sector, trade partners, clients or any parties relating to the Company** - Must not give or accept any forms of bribery. The business operation and the communication with all parties relating to those organizations must proceed transparently, honestly and under the law.



鈴木正美

(Mr. Masami Katsumoto)

Chairman of The Board

Sanko Diecasting (Thailand) PLC.

Approved by The Board of Directors Meeting , 2nd/2017

Issue date : May 12 , 2017



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Anti-corruption Policy : Gift & Entertainment

Definition: Receiving of gifts, presents, entertainments or any benefits where the gifts may influence the decisions to the certain extent that leads to not performing the duty fairly, for example, giving cash, bank notes or gold.

Guidelines: The Board of Directors, Executives and staffs must abide by the following practices;

- (1) Not requesting, giving or agreeing to receive money or benefits from parties relating to the Company, except if it is within customs or traditions, for example small seasonal gifts during Chinese New year and as long as it is not against the law.
- (2) Receiving customary and lawful gifts with the value of no more than 5,000 Baht.
- (3) In the case that the gifts cannot be rejected, and it is worth more than 5,000 Baht, the superior must be notified by using the gifts receiving form and deliver the said gift to the Human Resource Department to be used as awards for the staffs or to donate as appropriate.
- (4) The fees for business entertainment and other expenses relating directly to the business contract being made are acceptable but the costs must be reasonable.



Katsumoto Masami

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Chairman of The Board

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Anti-corruption Policy : Government Interaction

Definition: Giving of gifts or any benefits both directly and indirectly to the government officials in order to influence the decisions of the government officials and provide advantages to the business operation.

Guidelines: The Board of Directors, Executives and staffs must abide by the following practices;

Gifts for the government officials may be acceptable if consulted by the superiors and the said action must not be done for the purpose of;

- (1) Offering as business negotiation which may affect the decisions of the government officials.
- (2) Receiving confidential information relating to business opportunities or to the operation of the business competitors.
- (3) Lessening the control of the government which ignores the regulations of the states or causing the government officials to follow or refrain from following any illegal actions.



Masami Katsumoto

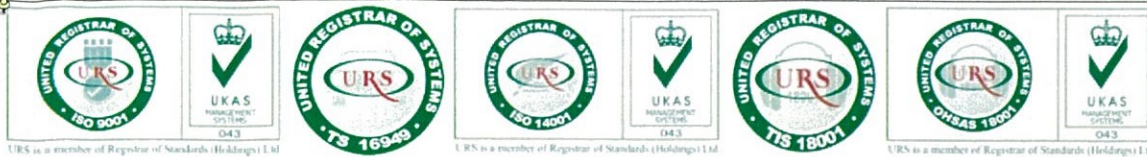
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Anti-corruption Policy

: Facilitation Payment

Definition: Facilitation fee is the money given as the payment for the support or the business benefits or the exchange of rights that may have not previously been permitted both directly and indirectly.

Guidelines: The Board of Directors, Executives and the staffs must proceed as follows;

- (1) Avoid all activities that may lead to or imply that the Company had paid the facilitation fees or bribery which will result in bad reputations for the Company.
- (2) Do not use the methods of accepting or giving money, assets or benefits to other parties in order to persuade them to perform illegal actions.
- (3) Not offering money, assets of benefits to individuals relating to the business in order to exchange for rights that are not previously permitted.
- (4) Business entertainment fees and other expenses that directly relates to the agreement in the contract are acceptable, as long as the costs are within reason.



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(Mr. Masami Katsumoto)

Chairman of the The Board

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: Donation and Sponsorship

Definition : Donation and sponsorship may be for the purpose of the business, products or the reputation of the Company which may face certain risk since it is the payment for services and benefits that are hard to evaluate and follow up. Sponsorship, in some cases, may be seen as connected to bribery.

Guidelines : Donation and sponsorship made by the Company must be authorized by the Company under the following conditions;

- (1) Must be the activities which are in accordance with the policies and the strategies of the Company.
- (2) Must be given to a specific and clear recipient.
- (3) Must be for a clear purpose which can be evaluated and carried out.
- (4) Must have a definite starting and ending period.
- (5) Must clearly specify the place that the donation or sponsorship will be used.
- (6) Must clearly identify the perceived benefits of the donation or the sponsorship whether who gains the benefits, directly or indirectly both in quantity and quality.
- (7) Must have a thank you letter, receipt or evidence of the payment that is verifiable.



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Anti-corruption Policy

: Use of 3rd party agents

Definitions : The action of the business representatives, suppliers and contractors has the risk of corruption in the business operations and may cause damages to the assets and the reputation of the Company.

Guidelines: The Board of Directors, Executives and the staffs must abide by the following practices;

- (1) The Company's anti-corruption policy regarding the rejection in all forms of bribery and corruptions must be clearly communicated to the business representatives, suppliers and contractors to be acknowledged and followed.
- (2) Any business transactions with the 3rd parties must consider the value according to the market price, no double standards or obstructing the business conducts with undesirable or unlawful methods.
- (3) Any juristic actions or business transactions with outside individuals, background checks of those individuals must be performed including the terms and conditions of such juristic actions or transactions to make sure that there are no corruptions.
- (4) Any employment of the government officials or outside individuals both for the purpose of consultation or as staffs, the person responsible must make sure that the employment is according to the law, transparent, apparent and not relating to corruptions.
- (5) Any employment of the individuals to act as the Company's representative, the person responsible must notify the said individuals about the business ethics regarding corruption and make sure that the employment terms are lawful, transparent, appropriate and not relating to corruption.
- (6) Avoid business transactions that may damage the reputation of the Company although the said transaction could be beneficial to the business.



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Whistle Blowing Policy

Sanko Diecasting (Thailand) Public Company Limited always emphasizes on the principle of good corporate governance, therefore, the Company encourages the Executives and the staffs to conduct their business transparently, fairly and accountable which is in accordance with the good corporate governance and the business ethics that aims for everybody to report honestly regarding any actions that may breach the Company's code of conducts, in order to help improving the business operation to be appropriate, fair and transparent for the future.

Leads and complaints on corruptions are as follows;

- (1) Discovering unlawful conducts relating directly or indirectly to the Company, for example, discovering the staff in the Organization bribes or accept the bribe from government or private officials.
- (2) Discovering actions that violates the procedures of the Company or affects the internal control system of the Company that may be relating to corruption.
- (3) Discovering actions that damages the reputation of the Company or causes the Company to lose out on its benefits.
- (4) Discovering actions which are against the law, moral conducts and business ethics.

People eligible for the complaints

Staffs or outside individuals who have witnessed or discovered leads, including individuals who are affected from the Company's business conducts or from the actions of the Directors, Executives or the staffs who violate or neglect the laws or the principle of good governance, business ethics, policies and the regulations of the Company, including actions that may relate to corruption. Also, the Company encourages the whistle blower to reveal their identities and provide enough accurate evidence.

Procedures upon receiving the leads or complaints are as follows;

- (1) The complainant will proceed to gather evidence regarding the violation of the business ethic by themselves or appoint appropriate personnel to perform the tasks instead.
- (2) Once the evidence have been collected, the complainant will file the case together with documents and/or the evidence to the Chairman of the Board or the Audit Committee, depending on the case.
- (3) The Chairman of the Board or the Audit Committee will analyze the evidence and if found truthful, will proceed to stop the violation of the business ethics together, and compensate those who are affected accordingly.
- (4) The complainant will report the results to the whistle blower if they reveal their identities.

When under inconvenience circumstances or feeling reluctant to report the incident to the superiors or suspecting that the superiors or the Executives of the Company is involved in the corruption, the staffs can report through the following channels;

- (1) Company's website (www.sankothai.net/investor).
- (2) Letter to the Chairman of the Board or the Audit Committee at Sanko Diecasting (Thailand) Public Company Limited, 3/14 m. 2, T. Nong Bua, A. Ban Khai, Rayong, 21120

Whistle blower protection measurese are as follows;

The Company protects those who coopertate with the Company in reporting, complains or refusing to engage in the corruption that relates to the Company, so that they will not be harmed or receive any unfair treatment from cooperating with the anti-corrpution policy. This is done by;

- (1) The Company will not demote, punish or perform any actions that will negatively affect the staffs, both in the case of being the whistle blower or refusing to take part in the corruption that relates to the Company, although the said action may result in the Company's loss in the business opportunity.
- (2) If the whistle blower or the staffs who refuse to take part in the corruption, found themselves in danger, they may request the Company for the appropriate protecting measures or the Company can provide protection in the case that there may be possible harm to the staffs.



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