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Sabina Public Company Limited and its subsidiaries

Anti-Corruption Policy and Operational Measures under the Anti-Corruption Policy

Revised Edition November 2024

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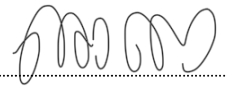
Introduction

Sabina Public Company Limited, “the Company,” and Sabina Fareast Company Limited, “the Subsidiary,” have been engaged in the business of manufacturing and distributing women’s underwear for all age groups and price ranges. The Company offers brands catering to children, pre-teens, teenagers, working women, young adults, and mature women, with price points that meet the needs of a broad consumer base.

The Board of Directors and management at all levels prioritize operating the business with integrity and transparency, focusing on the organization’s interests. They do not support actions that involve intellectual property infringement or political bias. Policies have been established to promote participation from everyone in the organization, raising awareness of the negative impact of corruption and fostering good values without exposing the business to unnecessary risks. All personnel from the Company and the Subsidiary are required to strictly adhere to these policies. Additionally, employees are sent to participate in anti-corruption training courses offered by various institutions to study, review, and improve the Company’s and the Subsidiary’s disclosure of anti-corruption information.

The company conducts annual reviews, audits, and updates of its anti-corruption policies and measures, and reports the findings to the Board of Directors. This is done to measure the effectiveness of these measures, make improvements, and ensure they align with evolving risks.

This Anti-Corruption Policy is the 4th revision, and the previous Anti-Corruption Policy is to be revoked and replaced with this version. The Anti-Corruption Policy and the operational measures under this policy were approved by the resolution of the company’s Board of Directors at the Board of Directors’ meeting No. 4/2567 on November 14, 2024.



(Ms. Duangdao Mahanavanon)
Chief Executive Officer

Sabina Public Company Limited and its Subsidiaries Anti-Corruption Policy

Sabina Public Company Limited, “the Company,” and Sabina Fareast Company Limited, “the Subsidiary,” have launched an anti-corruption campaign within the organization. The Board of Directors recognizes the importance of combating corruption, a growing threat to society. It is widely acknowledged that corruption is not only illegal but also unethical, negatively impacting the Company’s and the Subsidiary’s operations, as well as the economy, society, politics, and the nation. Corruption also encourages unethical behavior among employees, setting a poor example in society. To address these issues, the Company and the Subsidiary have joined the Thai Private Sector Collective Action Against Corruption (CAC) to assure all stakeholders that the Company and the Subsidiary adhere to principles of good corporate governance. The Company has established policies aimed at raising awareness among employees about the harmful effects of corruption, fostering good values, and ensuring the organization operates with transparency and accountability, without exposing itself to unnecessary risks. Clear and concrete anti-corruption policies have been established to guide these efforts.

To prevent such issues and strictly comply with relevant laws, the Company and the Subsidiary are committed to anti-corruption measures, refusing to tolerate any form of corruption. They require that all business-related personnel adhere to the Anti-Corruption Policy. This policy applies uniformly across all relevant departments and branches where the company and its subsidiaries operate.

The Company and its Subsidiaries communicate both internally (directors, executives, and employees) and externally (new businesses, partners, and business associates) to ensure that all relevant stakeholders understand that no cash, goods, or any other benefits should be offered and/or solicited or accepted from business partners related to the Company and its Subsidiaries, whether in the public or private sector. Additionally, they must refrain from engaging in or performing any actions that fall under this category and must not demand, undertake, or accept bribes for the benefit of the Company and its Subsidiaries, themselves, their families, friends, or acquaintances. Any personnel who fail to adhere to this policy will face disciplinary action, which will depend on the specific facts and circumstances surrounding the violation.

At the same time, the Company and its Subsidiaries have no policy of demoting, penalizing, or imposing negative consequences on employees who refuse to engage in corrupt practices, even if such actions result in the Company missing business opportunities. The Company and its Subsidiaries have designated responsible parties to establish guidelines, procedures, and documentation for monitoring and reporting.

The Board of Directors has assigned the Audit Committee to oversee compliance with the anti-corruption measures. The Audit Committee is responsible for reviewing the relevant measures and internal control systems, as well as reporting on the adequacy and effectiveness of the anti-corruption measures. Additionally, they will provide recommendations to the Board of Directors regarding best practices or necessary internal control systems, which the Board will then implement.

This Anti-Corruption Policy requires all personnel of the Company to strictly adhere to its provisions.

The Anti-Corruption Policy covers the following areas:

1. Gift and Hospitality
2. Sponsorship
3. Donations
4. Political Contributions
5. Conflict of Interest
6. Bribery and Facilitation Payment
7. Revolving Door
8. Whistleblowing, complaints, advisory services, and whistleblower protection

The establishment of policies, practices, and an internal control system to prevent corruption will result in transparency and good corporate governance in a concrete and verifiable manner. The company and its subsidiaries strongly hope that these approaches will benefit all related parties. These policies have been established as anti-corruption measures, including finding appropriate solutions and setting up channels for whistleblowing or submitting complaints to the company's internal audit office and independent directors in cases where acts of corruption or misconduct by individuals are detected.

Definitions

Corruption	refers to the act of performing or exercising power in a position of authority in an improper manner, in violation of company rules and regulations, and the law, for the purpose of obtaining undue benefits.
Company	refer to Sabina Public Company Limited.
Subsidiaries	refer to Sabina Fareast Co., Ltd. and Sabina International Co., Ltd.
Board of Directors	refers to the directors of Sabina Public Company Limited and its subsidiaries.
Anti-Corruption Committee	refers to the committee responsible for formulating and developing policies related to anti-corruption.
Company personnel	refers to directors, executives, and employees at all levels of the company and its subsidiaries.
Related persons	refer to individuals or legal entities with business relations, as well as state officials, state agencies, state enterprises, private organizations, and charitable organizations.
Stakeholders	refer to shareholders, customers, company personnel, partners/creditors, society and the environment, competitors, and related persons.
State employees/officials	refer to civil servants, employees, workers, committees, or individuals working in administrative agencies, dispute resolution committees, or any persons or committees authorized by law to issue regulations, orders, or resolutions that impact individuals or objectives.
Giving or receiving gifts	refers to the act of giving or receiving gifts, assets, or any other form of compensation.
Entertainment and hospitality	include assets, items, cash, cashier's checks, gift checks, coupons, and the provision of meals and hospitality as a token of goodwill or as a reward to influence stakeholders or related persons to perform dishonest or illegal actions.
Political Contributions	refer to financial, material, or service contributions, including actions that violate the law, which are considered political activity support, whether directly or indirectly.
Sponsorship	refers to giving or receiving financial support, with the objective of benefiting the business or reputation of the company and its subsidiaries.
Donation	refers to organizing activities or making donations that may have hidden agendas or actions intended to gain future benefits for the company and its subsidiaries.
Bribery	refers to money, items, gifts, rewards, or any other form of compensation offered to influence someone's decision, action, or omission to act in order to gain an unfair advantage or achieve personal goals in a dishonest, illegal, or unethical manner, violating the company's code of conduct.

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Facilitation Payment

refer to small, informal payments made to state officials to ensure that they carry out a process or to expedite the process. These payments do not involve the discretion of the official and are for actions the official is obligated to perform, as a legal right, such as obtaining licenses, certificates, or receiving public services.

Conflict of interest

refers to engaging in activities that create a conflict between the employee's personal interests and the company's interests, potentially undermining work efficiency and causing bias in decision-making. Personal interests may include outside business activities, financial interests, or personal relationships.

Whistleblowing

refers to providing information to the company regarding operations believed to involve wrongdoing or suspicious behavior in violation of rules related to corruption, business ethics, or applicable laws.

Complaints

refer to reports concerning the misconduct of the company's personnel.

Duties and Responsibilities

The Board of Directors has the following duties and responsibilities:

1. Oversee the effective implementation of the Anti-Corruption Policy and measures of the company and its subsidiaries. The Board may delegate the task to subcommittees or management to communicate these policies, ensuring that everyone thoroughly understands them and that they become ingrained in the culture of the company and its subsidiaries.
2. Assess the risks of corruption arising from the company's and its subsidiaries' operations at least once a year, and continuously update and improve the Anti-Corruption Policy.
3. Ensure compliance with the company's Anti-Corruption Policy and measures, with disciplinary action taken for violations in accordance with the company's rules and regulations.

The Audit Committee has the following duties and responsibilities:

1. Review internal control systems, internal audit processes, financial and accounting reporting systems, and risk management systems to ensure they are appropriate, stringent, and effective.
2. Review the company's anti-corruption processes align with guidelines from regulatory authorities, effectively covering areas such as awareness promotion, risk assessment, preventive systems, audits, and the review of self-assessments related to anti-corruption measures as inspected by the internal audit department. This ensures the company has proper systems in place as reported in the self-assessment of the Thai Institute of Directors (IOD).
3. Conduct reviews to obtain reasonable assurance regarding the processes for preventing and detecting corruption, including the measures the Company has in place to address such incidents when they occur.
4. Review related party transactions or transactions that may present conflicts of interest to ensure they comply with laws and stock exchange regulations, ensuring these transactions are reasonable and in the best interests of the company.
5. Review the disclosure of company information in cases of related party transactions or transactions that may present a conflict of interest, ensuring accuracy and completeness.
6. Conduct reviews to ensure that the company's whistleblower process for corruption cases is secure and appropriately managed.
7. Regularly report internal audit findings related to the company's anti-corruption measures to the Board of Directors, providing recommendations for best practices to the Board and management.

The Anti-Corruption Committee has the following duties and responsibilities:

1. Develop and update policies related to anti-corruption for the company and its subsidiaries, reviewing the policy's relevance at least once a year to ensure ongoing effectiveness.
2. Establish anti-corruption policies and measures to ensure they cover new businesses, partners, and business allies, ensuring that business operations are conducted transparently and free from all forms of corruption, such as bribery, etc.
3. Coordinate, support, and advise relevant departments to ensure the proper and effective implementation of the Anti-Corruption Policy.
4. Provide training for executives and employees at all levels to ensure they understand the company's anti-corruption policies and measures, including regular annual assessments to evaluate their knowledge.

The Internal Audit Department has the following duties and responsibilities:

1. Review and audit operations to ensure compliance with the company's Anti-Corruption Policy, relevant laws, and regulations.
2. Review and audit operations in accordance with the policies, practices, operational authority, company and subsidiary regulations, as well as laws and regulatory requirements, to ensure that there is an appropriate and sufficient control system in place to address potential corruption risks.
3. Hold a summary meeting to seek opinions regarding the internal control system or operational procedures for activities with corruption risks, with the Risk Owner or the department involved in those high-risk activities.
4. Collect statistics on all complaints/corruption-related whistleblower reports and regularly present them to the Audit Committee and the Board of Directors.
5. Report the audit findings to the management and relevant parties, with the ability to urgently report any issues found to senior management, the Audit Committee, and the Board of Directors.
6. Carry out tasks assigned by the Audit Committee and review the internal control system to ensure its efficiency and adequacy in line with the company's anti-corruption measures.

Company personnel have the following duties and responsibilities:

1. All personnel must strictly adhere to this Anti-Corruption Policy and measure.
2. All company personnel must not ignore corruption. If corruption is identified or suspected, it must be reported immediately to a supervisor, the Internal Audit Department, or the Board of Directors.

Operational Measures under the Anti-Corruption Policy

The Board of Directors of the Company and its subsidiaries has a policy that all personnel must conduct business with transparency, without seeking any benefits or profits that could lead to corruption, and must comply strictly with the law. To ensure clarity and control over operations that may pose corruption risks, the company and its subsidiaries must be cautious of the following internal practices that could contribute to corruption:

Guidelines

1. Company personnel shall not engage in or support corruption to facilitate the performance of work, business operations, or personal benefits of any internal department within the company and its subsidiaries.
2. Products, raw materials, cutting parts, premiums, gift vouchers, or various tools and equipment, as well as cash sales and petty cash, are considered company assets and those of its subsidiaries and cannot be used for personal benefit.
3. Information, methods, processes, reports, and programs related to production formulas, product design, and customer membership of the company are considered the intellectual property of the company. They must not be violated or disclosed to anyone. The intellectual property of the company and its subsidiaries cannot be altered, copied, or used for personal benefit.
4. Operational guidelines for departments must strictly follow the company's and its subsidiaries' standards, regulations, and rules, ensuring no loopholes that could lead to fraudulent or corrupt practices. The following are key procedures:
 - 4.1 Placing orders for products to be sold directly to target customer groups must follow the set criteria. Any actions beyond these guidelines require approval from authorized personnel.
 - 4.2 Placing orders for products to be displayed to customers must be in an appropriate quantity. Any actions beyond these guidelines require approval from an authorized person only.
 - 4.3 Selling products according to the specified price and promotional offers.
 - 4.4 Recording and reviewing sales data in accordance with the actual sales figures, following the standards, regulations, and rules of the company and its subsidiaries.
 - 4.5 Recording and reviewing the return information to ensure it matches only the items returned from the store.
 - 4.6 Recording and reviewing the shipping information to ensure it matches only the items that have been ordered for sale.
 - 4.7 Recording and reviewing the customs clearance process for imports and the expenses related to imports and exports to ensure they match the actual documents generated.
 - 4.8 Recording and reviewing the expenses for special promotional activities to ensure they align with the work plan.
 - 4.9 Avoiding marketing communications that directly compare with competitors' products or services.
 - 4.10 Online sales orders must match the items and quantities ordered by the customer.

- 4.11 Designing products for the company and its subsidiaries only; external work is not allowed in the workplace. The company's and its subsidiaries' interests and those of its customers must always take priority.
- 4.12 Research and development of products is exclusively for the company and its subsidiaries, without bringing any external work into the workplace. The primary focus is on the interests of the company, its subsidiaries, and customers, and there shall be no disclosure of confidential information regarding the company's and its subsidiaries' products.
- 4.13 Remaining neutral in purchasing and procurement to avoid any impact on selection decisions, and strictly adhering to the standards, regulations, and rules of the company and its subsidiaries.
- 4.14 In the case of adjusting / changing raw materials or modifying cost prices, such matters must be received from the purchasing department and merchandiser only. After the adjustments are completed, the relevant departments must be notified.
- 4.15 Receiving and issuing raw materials, including cutting parts, must involve verifying the accuracy of the documents and ensuring they match the raw materials.
- 4.16 Following up on debts and preparing reports on any irregularities related to debt tracking in a straightforward manner.
- 4.17 Conducting inventory counts in stores and prepare reports on any irregularities related to inventory counting in a straightforward manner.
- 4.18 Verifying the accuracy and completeness of documents before invoicing, receiving invoices from debtors, recording accounting entries, and updating account items.
- 4.19 Recording accounting entries, adjusting account items, and preparing accounting reports according to the accounting policies of the company and its subsidiaries, which comply with accounting standards and other applicable laws, with approval from authorized personnel.
- 4.20 Preparing accounting/financial reports that accurately reflect the facts, with correct and complete documentation.
- 4.21 Preparing financial statements, accounting/financial reports, documents for license renewal (Form Ror.Ngor. 4), and tax filings such as property tax, land tax, and signage tax, for submission to relevant authorities and to disseminate financial information to the general public, ensuring that the information reflects actual data and has been verified and approved by authorized personnel.
- 4.22 Storing accounting/financial documents for the duration required by law and keeping them in an appropriate location.
- 4.23 Reviewing expenses submitted for reimbursement; they must be expenses incurred from the operations of the company and its subsidiaries, supported by credible documentation, and subject to verification and approval by authorized personnel.
- 4.24 Making payments directly according to the documents and supporting evidence for reimbursement, and establishing measures to prevent duplicate payments.
- 4.25 Preparing financial reports in a straightforward manner.

5. The Company has established a human resources management process that reflects its commitment to anti-corruption measures. Recruitment, employee selection, training, performance evaluation, compensation determination, promotions, and terminations must all be conducted in accordance with the company's policies and those of its subsidiaries, ensuring fairness and integrity.
6. The Company maintains a policy to not demote, penalize, or negatively impact employees who refuse to engage in corrupt practices, even if such refusal results in a loss of business opportunities. This policy is communicated to all employees through designated channels.
7. The Company provides ongoing communication, training, and evaluation for employees and subsidiaries to ensure a thorough understanding of the policy and anti-corruption measures, the company's expectations, and the consequences of failing to comply.
8. The Company enforces penalties for employees at all levels who violate or fail to adhere to the anti-corruption policies and measures, with punishments in accordance with company regulations.
9. The Company has a policy to disclose the number of employees who have been penalized or terminated for failing to comply with the Anti-Corruption Policy.
10. The Company also has a policy to disclose any expenses incurred due to non-compliance with the anti-corruption measures, such as political contributions, fines, compensation, or penalties arising from corrupt practices.
11. The company has established procedures for the storage of documents and records to be ready for verification to confirm the accuracy and appropriateness of financial entries, as well as procedures to ensure that no entries are unrecorded, unexplainable, or fraudulent.
12. The company has established procedures to ensure that the internal controls of the accounting processes and data retention are internally audited to confirm the effectiveness of the processes in accordance with anti-corruption measures, and to ensure that financial entries are supported by sufficient evidence for auditing purposes.
13. In establishing new business ventures, including procurement and contracting, consideration must be given to collaborating only with business partners or suppliers that have a clear stance against corruption in all forms (e.g. bribery, facilitation payments). This evaluation is based on whether these partners are members of the Thai Private Sector Collective Action Against Corruption (CAC) or on the company's operational policies.
14. There must be a continuous assessment of the status of business allies and partners regarding their commitment to transparent, verifiable operations and their dedication to combating corruption in all forms.
15. The company communicates its anti-corruption policies and practices to its subsidiaries, allies, business partners, stakeholders, and the public through various communication channels to ensure awareness and implementation of anti-corruption measures.

Gift and Hospitality

The Board of Directors of the Company and its subsidiaries has a policy that encourages the company's personnel to conduct business with transparency, without seeking any benefits or profits that could lead to corruption. A policy has been established regarding the acceptance and giving of gifts, assets, or any other benefits, as well as hospitality and entertainment services. This includes procedures and controls that can be audited to ensure compliance with the company's policies regarding the acceptance and giving of gifts, assets, or any other benefits, hospitality, and entertainment services, which should not lead to corruption.

Guideline

- Company personnel must strictly follow the Company's anti-corruption policies regarding the giving and receiving of gifts, assets, or other benefits, as well as entertainment and hospitality.
- The Company and its subsidiaries have implemented policies to regulate the giving and receiving of gifts, assets, or other benefits, as well as entertainment and hospitality, to mitigate the impact on decision-making that could lead to undue influence or conflicts of interest.
- The company and its subsidiaries do not prohibit the acceptance and giving of gifts bearing the company's logo in order to maintain business relationships or to act in accordance with traditions and ethical standards.
- Gifts, assets, or other benefits must not be in the form of cash or cash equivalents, nor should they be illegal.
- Entertainment should not create a sense of obligation or lead to any form of corrupt reciprocation. It must also comply with applicable rules, regulations, and laws.
- In the case of selection, price negotiation, purchasing, sourcing of products, raw materials, sales areas, or any benefits provided to the company and its subsidiaries, there must be no demands for the acceptance or giving of gifts, assets, or other benefits, nor for hospitality intended as bribes that would lead to receiving undeserved privileges or the establishment of joint contracts. This must also not result in officials neglecting to adhere to the established standards, regulations, and rules.
- The company and its subsidiaries have communicated and publicized to the company's personnel, as well as allies, business partners, and individuals involved in business operations, to create an understanding of the policies and practices regarding the acceptance and giving of gifts, assets, or other benefits, hospitality, and entertaining services of the company and its subsidiaries.

Giving and Receiving Sponsorship

The company's Board of Directors and its subsidiaries have a policy that requires the company's personnel to conduct business with transparency, without seeking any benefits or profits that could lead to corruption. Policies, procedures, and controls regarding the giving and receiving of sponsorship have been established, including a review of approvals by authorized individuals within the company and its subsidiaries, as well as monitoring to ensure that the support provided does not lead to corruption.

Guidelines

- Company personnel must strictly follow the Company's anti-corruption policies regarding the giving and receiving of sponsorship.
- Giving or receiving of sponsorship must be done solely in the name of the Company and its subsidiaries and cannot be used as an excuse for corruption. Additionally, there must be complete and credible documentation to ensure that it can be audited.
- The company and its subsidiaries have communicated and publicized to their personnel, including allies, business partners, and individuals involved in business operations, to create understanding regarding the policies and practices of giving and receiving of sponsorship by the company and its subsidiaries.

Donation

The company's Board of Directors and its subsidiaries have a policy that encourages personnel to conduct business with transparency and not seek any benefits or profits that may lead to corruption. They have established policies, procedures, and controls for donations, which include reviews of approvals by authorized personnel of the company and its subsidiaries, as well as monitoring to ensure that donations do not lead to corruption.

Guidelines

- Company personnel must strictly follow the Company's anti-corruption policies regarding the donation.
- Donation must be made solely in the name of the Company and its subsidiaries and cannot be used as an excuse for corruption. Additionally, there must be complete and credible documentation to ensure that it can be audited.
- The company and its subsidiaries have communicated and publicized to their personnel, including allies, business partners, and individuals involved in business operations, to create understanding regarding the policies and practices of donation by the company and its subsidiaries.

Political Contributions

The Board of Directors of the Company and its subsidiaries have established a policy that requires personnel to remain politically neutral. They must not engage in or support political parties or political figures, either directly or indirectly. The Company and its subsidiaries respect political rights and freedoms under the law, adhering to the democratic system with the King as Head of State.

Guidelines

- Company personnel must comply strictly with the law.
- Company personnel have the right to exercise their political rights under the constitution, such as voting in elections.
- Company assets and resources must not be used to support the political activities of any political party, political group, or politician, as this could lead to unfair advantages or the creation of inappropriate joint agreements.
- Personnel of the company should avoid expressing opinions related to politics within the company and its subsidiaries, which may lead to internal conflicts within the company and its subsidiaries.
- The company and its subsidiaries have communicated and publicized to the personnel of the company, as well as allies, business partners, and individuals involved in business operations, to create an understanding of the company's and subsidiaries' policies and practices regarding political contributions.

Conflict of Interest

The company's Board of Directors and its subsidiaries have a policy that encourages personnel to conduct business with transparency and not seek any benefits or profits that may lead to corruption. A policy regarding conflicts of interest has been established, including procedures and verifiable controls, to ensure that there are no conflicts of interest that align with the policies set by the company and its subsidiaries, and that do not lead to corruption.

Guidelines

- Company personnel must comply strictly with the law regarding conflict of interest.
- Employees are prohibited from engaging in any business activities that may create a conflict of interest with the company and its subsidiaries, whether directly or indirectly. They must not use their positions for personal gain or that of their associates and should strive to avoid any business dealings that could lead to a conflict of interest that may impact decision-making. This includes any transactions or business activities conducted in a personal capacity or in the name of a legal entity in which they have an interest.
- The company and its subsidiaries have communicated and publicized to the personnel of the company, as well as allies, business partners, and individuals involved in business operations, to create an understanding of the company's and subsidiaries' policies and practices regarding conflict of interest.

Bribery and Facilitation Payment

The Board of Directors of the Company and its subsidiaries has a policy that requires the personnel of the company to conduct business with transparency and not to seek any benefits or profits that could lead to corruption. Policies, procedures, and controls have been established to prevent bribery and facilitation payments, with a review of various expense items of the company and its subsidiaries. There is also monitoring in place to ensure that there are no bribery and facilitation payments in accordance with the policies set by the company and its subsidiaries, and to prevent corruption within the organization.

Guideline

- Company personnel must strictly adhere to the anti-corruption policies related to bribery and facilitation payment.
- Bribery and facilitation payment in the business operations of the company and its subsidiaries is prohibited in all forms, whether directly conducted by the company and its subsidiaries or through third parties, including business representatives (if any). Furthermore, engagements with the public sector must be conducted transparently, honestly, and in accordance with the law.
- The company and its subsidiaries have communicated and publicized this policy to their personnel, as well as allies, business partners, and individuals involved in business operations, to create understanding regarding the policy and practices concerning bribery and facilitation payment of the company and its subsidiaries.

Revolving Door

The Board of Directors of the Company and its subsidiaries has established a policy requiring personnel to conduct business transparently and to refrain from seeking any benefits or profits that could lead to corruption. A policy regarding revolving doors has also been implemented, along with procedures and controls that can be verified to ensure compliance with the company's and its subsidiaries' policies. This is intended to prevent the revolving doors from being used as a channel that may lead to corruption.

Guidelines

- Company personnel must strictly adhere to the anti-corruption policies related to revolving doors.
- The company and its subsidiaries shall not hire or appoint current public officials to work within the company and its subsidiaries.
- A two-year waiting period is required before hiring or appointing former government employees/officials who have left their positions or individuals who have previously worked for regulatory agencies directly related to the Company or its subsidiaries.
- The Company will publicly disclose the names and backgrounds of former government employees/officials who are appointed as advisors / directors / executives of the Company or its subsidiaries, along with the reasons for their appointments, in Company publications.

- The company and its subsidiaries have communicated and disseminated information to their personnel, including allies, business partners, and individuals involved in their operations, to foster understanding of the company's and subsidiaries' policies and practices regarding the revolving door.

Whistleblowing, complaints, advisory services, and whistleblower protection

The company and its subsidiaries have established measures for reporting whistleblowing, complaints, illegal activities, ethical violations, or behaviors that may lead to corruption or misconduct by the company's personnel, related individuals, and stakeholders. This includes measures to protect whistleblowers and the procedures for processing reports or complaints as follows:

Channels for Reporting Whistleblowing, Complaints, and Advisory Services

The company provides opportunities for its personnel, related individuals, and stakeholders to report whistleblowing and complaints as a means of development and sustainability for the organization as follows:

- Internal Audit Office via email : GRP_AUDIT_HO@sabina.co.th
- Internal Audit Office via Line@ : @SABINA AUDIT 191
- Internal Audit Office via postal mail : Internal Audit Department
Sabina Public Company Limited
12 Arun Amarin Road,
Arun Amarin Subdistrict,
Bangkok Noi District,
Bangkok 10700, Thailand

Whistleblower Protection Measures

- The whistleblower can choose to remain anonymous if it is deemed unsafe for themselves and the individuals involved. However, if the whistleblower reveals their identity, it will enable the company and its subsidiaries to provide updates and clarify facts to the whistleblower.
- The recipient of the complaints will keep the information received from the whistleblower confidential and prioritize the safety of the whistleblower. Measures will be implemented to protect the whistleblower, those providing information, and those cooperating in the investigation. They will be protected from unfair treatment, such as changes in job position, job responsibilities, workplace location, suspension, intimidation, disruption of work, and termination due to the act of filing a complaint, among others. General complaints and procedures will be kept confidential by the Internal Audit Office, while complaints regarding misconduct by senior executives will be retained by the secretary of the Audit Committee to report directly to the Audit Committee

Procedure for Handling Reports and Complaints

The Internal Audit Office serves as the agency for receiving complaints and suggestions, collecting statistics on all complaints and information related to corruption, and presenting this information to the Audit Committee and the Board of Directors on a regular basis with the following procedures:

- The complaint handler collects relevant facts regarding the violation or non-compliance with the company's and its subsidiaries' anti-corruption policies that have been reported through whistleblowing or complaints.
- The complaint handler presents the information to the Anti-Corruption Committee for investigation of the facts, with a time frame not exceeding 30 days from the date of receipt. They also establish measures to mitigate the risks arising from non-compliance with the anti-corruption policies.
- If the matter involves a violation of the policies or anti-corruption measures, the complaint handler must report to the Chief Executive Officer, the Audit Committee, and the Board of Directors as soon as possible.
- The complaint handler is responsible for informing the complainant of the investigation results within 7 days from the date of concluding the investigation.
- If the accused engages in corruption, it is considered a violation of the company's anti-corruption policies and measures, requiring disciplinary action in accordance with the regulations of the company and its subsidiaries. If such actions contravene legal principles, they will face legal penalties accordingly.

Dissemination of Anti-Corruption Measures

To ensure that Company personnel, allies, business partners, and stakeholders are informed of the policies and measures against corruption, dissemination will occur through the following channels:

Internal Agencies

- Announcements via the Company's electronic media
- Bulletin boards at offices and various factories
- Public announcement systems
- Line@ : SABINA_HO, SABINA_CN, SABINA_S5, SABINA_YS, SABINA_TP, SABINA_BR , SABINA AUDIT 191
- Orientation sessions for new employees
- Annual training for Board members, executives at all levels, and all employees to ensure understanding of the policies and anti-corruption measures, the Company's expectations, and emphasize compliance with these measures, including the penalties for non-compliance.

External Agencies

- Announcements via the Company's website
- Letters and electronic communications to business partners
- The company's annual report (56-1 One Report)