Golden Lime Public Company Limited

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Anti- corruption and Anti-bribery Risk Management Manual	

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Introduction, Objectives, and Scope

SUTHA is committed to conducting business under the principles of good corporate governance and managing operations with transparency, in full compliance with ethical standards and applicable laws. Corruption and bribery are behaviors that violate these principles and ethics, and they can cause severe damage to the company's reputation, trust, and long-term sustainability.

This handbook serves as a guide for all staff, including employees and management at all levels, to comprehend the company's policies and strategies for preventing corruption and bribery, along with the correct steps to follow when facing or suspecting unethical behavior. The goal is to guarantee that our operations comply with international standards and applicable laws.

Objectives of the Handbook

- Raise awareness of anti-corruption and anti-bribery.
- Establish clear guidelines for employees at all levels.
- Promote an organizational culture rooted in transparency and accountability.
- Serve as a communication channel and training material, providing access to resources that enhance understanding of best practices and preventive measures against potential corruption.
- Compile practical guidelines and examples to support learning and internal reference.

Scope of Application

This handbook applies to all employees, as well as business partners, agents, and stakeholders associated with the organization. All parties are required to strictly comply with this policy.

Mr.Sripop Sarasas
Chairman of the Audit Committee and
Chairman of the Board

Chapter 1

Anti-Corruption, Anti-Bribery Policy and Guidelines

Principle

The Board has designated personnel at all levels to implement anti-corruption measures and encourage current and future Business Partners, alliances and subsidiaries to be involved in anti-corruption practices.

The Company participates the Office of the National Anti-Corruption Commission as a pilot company of the morality and transparency of operations project of private-sector agencies and no complaints are found regarding corruption from stakeholders.

The Company policy aims to comply with the laws and set guidelines to ensure compliance with anti-corruption policies continuously. The Company is committed to support and supervise its executive, employees, agents, partners, and contractors to be aware of potential corruption and anti-corruption policies by showing its leadership in being anti-corruption. As the Company is a member of Partnership against Corruption for Thailand (PACT Network).

Definition of Corruption within the Group of Companies

The company has defined the scope and meaning of corruption within the group of companies as follows:

Corruption refers to actions taken to seek unlawful benefits, including acts or omissions of duty and/or abuse of authority, violations of laws, ethics, regulations, or company policies to obtain improper advantages in various forms. These include soliciting, receiving, offering, or giving property, goods, or any other rewards, including other benefits, cash or non-cash equivalents, bribery to government officials or individuals who do business with the company, as well as corruption between private entities for business benefit. Fraud, as defined under Section 341 of the Criminal Code, encompasses making false statements or concealing information that is required to be disclosed, with the intent to deceive another individual into transferring property or providing benefits.

Political contributions are defined as financial or other forms of support provided to political activities. These may include lending money, offering personnel assistance, supplying goods or services, running advertisements to back political parties, purchasing fundraising tickets, or donating to organizations closely connected to political parties, among other actions. The anti-corruption model with;

Bribery **|** According to the Criminal Code Sections 144 and 167 and the Anti-Corruption Act, bribery refers to giving, requesting, or accepting property or any other benefit as an inducement for a government official or any person to perform improperly or refrain from performing their duties properly.

Concealment and Obstruction of Justice **|** Under the Criminal Code Sections 142 and 184, this refers to destroying, concealing, or hiding evidence, or taking any action to obstruct investigations or court proceedings.

Conflict of Interest **|** As defined in Section 126 of the Anti-Corruption Act, this occurs when a government official has a vested interest in a contract or activity related to their official duties without disclosure as required by law. For this handbook, it covers cases where directors, executives, or employees have undisclosed interests in contracts or activities linked to their duties.

Embezzlement **|** Under Criminal Code Section 352, embezzlement refers to the act of a person lawfully possessing another person's property and then dishonestly appropriating it for themselves or others.

Money Laundering | According to the Anti-Money Laundering Act B.E. 2542, money laundering involves the concealment or conversion of funds or assets derived from illegal activities in order to present them as lawful.

Trading in Influence refers to requesting or receiving money or other advantages by suggesting that one can sway government officials' decisions or actions, as defined in Section 123/5 of the Anti-Corruption Act. In this manual, it also includes seeking or accepting benefits by claiming the ability to influence people with authority in an organization or company to make certain decisions or refrain from acting in their official capacities.

Guidelines

1. The Company encourages employees in all levels to realize and be conscious of the anti-fraud and corruption campaign. It also provides an internal control in a bid to prevent corruption and bribery extant in every country in which the Company makes an investment.
2. The Company shall create conscience, instill morality and stimulate a positive attitude among the employees requiring them to honestly adhere to the law and regulations.
3. The Company shall create an efficient and effective internal control system with audits and appropriate use of power to prevent employees from any involvement in corruption.
4. The Company's directors, executives and employees shall refrain from any behavior relating to the demand or acceptance of assets or any other benefit or from condoning corruption for themselves or families, friends and acquaintance or others which may influence toward misconduct, cause dereliction of duties or cause harm to the Company.
5. The Company's directors, executives and employees shall refrain from offering assets or any other benefits to external parties with the intent to influence such parties to engage in misconduct or abandon their duties or to pay a bribe for the benefit of the business.
6. The Company shall report its financial statements accurately and transparently.
7. The Company shall provide communication channels for employees and related parties for whistle-blowing, on the condition that whistle-blowers will be given complete protection. The Company shall also appoint officers to investigate such claims.
8. In order to clarify how the operation is of high corruption risk; the Company stipulates the administrators and all staff members to strictly adhere to the guidelines as follow;
   8.1) Political contributions refer to financial aid or otherwise in order to support political activities such as money lending, personnel support, providing goods or services, advertising to promote or support the political parties, buying tickets for raising funds or donating money to an organization with close ties to political parties. However, it does not include the employees who join the activities on their own right; nevertheless, they cannot present themselves as Company representatives or use any Company assets, devices or instruments for political purposes. The Company insists on political neutrality. The Company will never provide a political party, politicians or a party's candidates with financial assistance for the benefits of the Company.
   8.2) Charitable contributions, donations and aid grants may result in risk to the Company as such an activity is concerned with payment without obvious profit, used as an excuse to prevent a charitable contribution with concealed purposes. The Company stipulates policy and regulation as follows:
   The Company is determined to provide donations for foundations, including associations, public charity, nursing homes, schools, Red Cross society and temples all of which are registered with the government Revenue Department, and these donations can be used as a tax deduction. It also scrutinizes provided donations for annual activities organized by either the Company or the temples under the allocated amount in the budget. In the case of an emergency caused by a public hazard or natural disaster, a donation can be made after obtaining approval from the administrators. However, in order to closely monitor and scrutinize the donation, extensive details and photographs must be attached together with the donation proposal.
   8.3) Sponsorships are a way to publicize the Company's business reputation which is different from donations for charity. This may be done for the purpose of business, brand or reputation of the Company which is risk because it is a payment for services or benefits that are difficult to measure and track. Sponsorships may be linked to bribery. The Company has established policies and guidelines regarding to the sponsorships, process to review and control, details as follows:
      (1) The sponsorships must be examined or proved that activities are truly carried out for social benefit or as an act of corporate social responsibility. In this case, various necessary documents including receipts, project details and logo photo must also be attached.

(2) The sponsorships can be calculated, such as a contribution of accommodations and food, which is not related to the benefits for individuals or any agencies except as a decoration of honor traditionally practiced.
(3) The sponsorships can be made only if the payee is specifically identified together with the request document so as to obtain approval from the Company's administration.

8.4) Funding expenses provided to welcome customers and other hospitality expenses.
The Company realizes how good relations with its business allies can lead to continual achievement. It therefore allows staff members to either give or receive gifts, hospitality or other benefits within conditions specified by the Company as follows:
(1) The activities are carried out in line with the sales promotion policy, the trade conditions or the counselling service. It also includes the expenses of travelling, accommodations, food or gifts provided by customers or any expenses provided to welcome the customers, the investors or the shareholders who visit and observe the Company's business management. This includes the gifts occasionally provided on annual festivals.
(2) The expense funding is in accordance with related law.
(3) The expense funding is for the benefit of the Company and for not the personal benefit of the employees.
(4) The expense funding is not a kind of cash gift or equivalent to cash such as gifts or present readily exchangeable for cash.
(5) Gifts or hospitality are offered in line with appropriate tradition or festivals.
(6) Gifts or hospitality must not be offered especially during a bidding or procurement.
(7) They are openly offered and not contrary to procurement ethics.

9. Anti-corruption policy covers the personnel management process including personnel selection, the promotion, the training, the working evaluation and bonus. For this reason, the superiors in all levels are required to create a right understanding among the employees and urge them to strictly adhere to this policy. They also have to closely monitor implementation of the policy to ensure operations are carried out efficiently.
10. The Company will provide justice and protection for any employee, or others, who provide notification regarding the whereabouts of or evidence related to corruption in the Company and its group company, including any employees who object to said corruption. They will be given protection under the protection measures as regulated in the whistleblower policy.
11. Those who are involved in fraud and corruption which are considered as offenses within the regulations of personnel management are to face disciplinary punishment or legal punishment if the acts prove to be legal offenses.
12. The Company will regularly examine the guidelines and operational measures in order to comply with any legal changes and the business conditions.
13. In order to closely monitor the operations in line with the anti-corruption policy, the Company administration are required to afford an annual self-assessment.
14. The Company requires all staff members, including the Board of Directors, the executives and employees to strictly adhere to anti-fraud and corruption measures and also urges its business partners to jointly carry out these measures. The co-company or sub-company, if likely to be set up in the future, is also to adhere to this policy.

Responsibilities and Control

1) The Board of Directors is required to comply with anti-corruption policy, and put the policy into practice.
2) The Board of Directors has authorized the Managing Director to set up sub-committees. At present, the Managing Director has established sub- committees including a Safety and Health management committee, Energy preservation management committee, Quality management committee, and Management Committee. These committee members are authorized to jointly deliberate different fields of work and assign administrators in each agency to monitor and supervise operations in order to ensure good corporate governance policy.
3) The Audit Committee consists of independent directors who are responsible for reviewing internal control system and giving their opinion about internal control system, as well as ensuring that the Company complies with related laws.
4) The Audit Committee is in charge of assigning an internal auditor to review the internal control system. If the internal auditor is an external agent, the Audit Committee shall appoint a person who can coordinate with the internal auditor or assign the Committee's secretary to act as the coordinator.

5) The Audit Committee is in charge of assigning an internal auditor to review the internal control system. If the internal auditor is an external agent, the Audit Committee shall appoint a person who can coordinate with the internal auditor or assign the Committee's secretary to act as the coordinator.
6) The Internal Audit Coordinator shall be responsible for receiving any complaints or any claims and coordinate with the internal auditor to review and report to the supervisor or Manager or Audit committee about complains.
7) The Board of Directors establishes anti-corruption guidelines covering:
   - Corruption risk assessment processes
   - Governance and control practices to prevent risks
   - Monitoring and evaluation procedures, reviewed by the Audit Committee

Procedure of the Assessment of Corruption Risk

The Company has regulated the risk management system based on business operation in a bid to prevent and suppress corruption or any activities of high risk from corruption likely to occur as a result of the Company's business operation. It also evaluates the risk level including occurrence and impact as well as regulates the anti-corruption measures based on evaluated risk including the achievement evaluation and resources to be used to lessen the risk and follow up on the performance appraisal.

Guidelines to Monitor Supervise and Prevent Any Involvement in Corruption Risk

The Company has regulated guidelines to monitor, supervise and monitor the risk on fraud and corruption as follows:

1. Procedures, including an internal control system and risk management, which cover important work systems such as the sales and marketing system, procurement, control, budget management, account record and payment. This aims to prevent as well as monitor the risk on fraud and corruption and provide appropriate suggestions for solutions.
2. To conduct a risk assessment for fraud and corruption in the business supply chain process (CS20220801_Form) with stakeholders and perform an annual review.
3. Provide a channel of receiving information, evidence, complaint of a legal offense or a violation of the Company's business ethics, as well as guidelines to prevent any involvement in corruption, suspicions on the financial report or the internal control system. The Company is to provide protection for those who submit information or evidence. The information is to be treated as confidential. The Company must exercise disciplinary or legal punishment. Protection will be granted to those who submit evidence or complaint by means of written statement.

Heads of each department are in charge of monitoring the operations and informing the persons in authority.

Anti-Corruption Policy Compliance Monitoring

To ensure compliance with the Anti-Corruption Policy, in addition to designated individuals specified in Section 4, the Board of Directors has made anti-corruption a core responsibility for all directors, executives, and employees. Everyone must understand and follow the policy and code of conduct, avoiding illegal or unethical actions. Key stakeholders are encouraged to adopt these practices and work together to prevent corruption and bribery.

The following preventive measures are in place to address all forms of corruption.

Fraud risk is 2 categorized into 2 types;

- **Risk from internal corruption**
  Caused by personnel using public office for private unlawful gain; folks and families by misappropriating the company's assets, document forgery, embezzlement, accepting bribes, inappropriate gifts, double-dealing, etc.
- **Risk from external corruption**
  Caused by persons outside the organization but impacted the company, such as false cheques, fake financial documents, fraud, etc.

1. Definitions for mutual understanding of corruption.

Acts classified as fraud

as a guideline for risk assessment, acts are classified as fraud, for example

> Dishonest conduct or intentions to commit fraud
> Misuse of company assets for the benefit of oneself or others
> Misappropriation or theft of company property
> Deliberate misrepresentation or concealment of information
> Deliberately misreporting financial information or financial transactions.
> Editing of accounting numbers, such as fake receipts, concealing debts or expenses, etc.
> Falsifying Documents, changing non-financial reports such as changing data, employee qualifications, altering internal documents or modifying disclosed documents with the intention of misleading a person or company for reputation damage to the company or the relevant
> Disclosure of information that is considered confidential or trade secrets of the Company to third parties
> Seeking, soliciting or accepting valuable deal or gifts from business associates
> Offering valuable gifts to officials, government agencies, or acting in an unlawful practice
> **Conflict of Interest**: Having an undisclosed interest in a contract or activity related to one’s official duties.
> **Fraud**: Engaging in deception by making false statements or concealing facts that should be disclosed, causing others to believe and transfer property or grant benefits.
> **Money Laundering**: Concealing or transforming money or assets obtained from unlawful activities to make them appear legitimate.
> **Trading in Influence**: Soliciting or accepting property or other benefits by claiming to have influence or the ability to persuade individuals with authority within the organization or company to act or refrain from acting in their duties.

The above examples are partial. In case any employee finds any activity suspicious or fraudulent, he/she can contact below unit.

- Supervisor, manager or top management according to the chain of command
- Accounting and Finance Department or Human Resources Department or management
- Audit Committee

2. Elements of corruption

4 elements of Corruption

(1) Motive

A corrupt person may be an employee or outsider who may be dissatisfied with the organization or have financial problems, influenced by debts to commit fraud.

(2) Attraction

Profit and/or benefit attract corrupt people to commit fraud as they desire such gain despite of illegal gain.

(3) Opportunity

Opportunity means the likelihood or opportunity that a corrupt person can commit a fraud. Preventive control such as an internal controls system can helpfully reduce such opportunity especially with those dealing with cash.

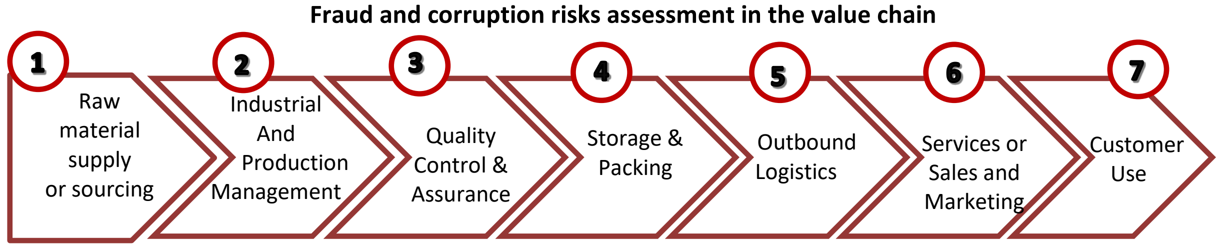
(4) Concealment

The fraudster or perpetrator is to manipulate or hide his dishonest acts differently from explicit stealing or hijacking.

3. Forms of fraud and preventive measures

Examples of corruption patterns

Fraud and corruption risks assessment in the value chain



1) Procurement, sourcing, hiring

- Asking for private gain or benefit from seller or service provider by consenting to the seller or service provider conspiring to offer a price that is higher than the market price, or the average price, or too much expensive; or
- Authorized person seeking forbidden private benefits from the contractor/service provider by contracting them regardless of the company procurement system steps in the procurement
- Procurement of products / raw materials that do not meet requirements or order more than the amount required for demanding or obtaining benefits but the company has to pay more or higher

2) Contract / Sub-contractors Outsourcing

- Hiring unqualified subcontractors who lack skills or expertise not suitable for the job by requesting money or other benefits from sub-contractors with such low quality.
- Allowing higher wages, reimbursements of wages than actual performance causing more expense and damage to the company

3) Sales fraud

- Deliberately mis-invoicing as pre-approving the sale of goods to create fake sales for incentives or commissions then cancelling such invoices

4) Bidding

- Bidding with government agencies or private agencies with offering bribes to government officials/employees, government agencies/private agencies so that the company wins the bidding or shortcut the process
5) Mutual benefits between companies and government officials / employees Government agencies / government employees
- offering or providing benefits, directly or indirectly, to a government official for the purpose of influencing official action or inaction, inducing an unlawful act, or to secure an improper advantage.
6) Provide compensation in various forms
- to contractors / subcontractors or agents / brokers beyond the agreement of the company as sharing such extra compensation with the contractor / sub-contractor or that agent/broker
7) Fraudulent sales of scrap or idle assets
- Authorized persons or related persons request benefits in return from buyers or use inside information in auctions to offer lower or higher prices. To mitigate the risk of corruption during the sale of scrap or unused assets, the Company has designated representatives from multiple departments to serve on the committee responsible for overseeing and approving these transactions.
8) Cash fraud
- Cash is the most liquid asset because it is used for buying and selling goods and services instantly without losing its own value unlikely to other assets. However, the company prescribes selling products and any scrap by means of payment to a bank account in the name of the company only. The implementation of cash reserve (Petty Cash) and cash advance practices serves to mitigate the risk of embezzlement and ensure that funds are allocated solely for business-related purposes.
9) Material or asset corruption
- The act of taking materials or property from a storage or location, which usually occurs with materials or property that are small in size but have a relatively high unit price.
10) Travel expenses fraud
- Forgery of travel orders and invoices for reimbursement, even though there is no actual travel or making a list of expenses higher than the amount actually paid

4. Fraud Risk Assessment Duty

Personnel at all levels of the Company and its subsidiaries must comply with business ethics and work practices and are responsible for assessing fraud risks including reviewing fraud risks in each process that may occur. The fraud risk assessment review shall be done at least every 2 years.

5. Fraud Risk Assessment

Fraud Risk Assessment is considered preventing corruption in the organization in 4 steps as follows:

Step 1: To determine the risk impact and the likelihood of occurrence, the acceptable risk level (Risk Appetite).

Step 2: To Identify fraud risks, cause, impact, severity, likelihood then internal control measures.

Step 3: To assess existing internal control systems, the severity, and likelihood after the risk treatment to ensure efficient risk mitigation to an acceptable level.

Step 4: To establish risk mitigation measures to an acceptable level for the organization in the case that the current internal control measures are insufficient to prevent fraud risks

6. Risk Assessment Criteria

Assessing the severity of the risk by evaluating that each factor How much is likely to happen? And if it happens, how severe will it affect the organization? By evaluating the likelihood of the likelihood of occurring (Likelihood Score) and the level of impact (Impact Score) by taking all the identified risks into consideration in order to prioritize the risks and the risk assessment is divided into 2 dimensions:

(1) Likelihood / frequency of occurrence (Likelihood : L) means the probability of one (or more) event(s) in a given time frame

Table 1 : Opportunity/Frequency Criteria

Level	Probability / Frequency	Probability or Likelihood			
		frequency	Probability	Likelihood	Estimated from the status of actual events.
5	Severe	1 - 3 months	More than 80 %	Very Likely	The incident has been reported and is currently under investigation.
4	High	4 - 6 months	70 % - 80 %	likely	Incidents under management
3	Moderate	7 - 9 months	60 - 69 %	Possible	incident managed
2	Minor	10 - 12 months	50 % - 59 %	Unlikely	The exact cause of the incident is being resolved.
1	Possibly	More than 12 months	less than 50%	Very Unlikely	The exact cause of the incident has been resolved. (Lower chance of recurrence)

(2) Impact level (Impact : I) mean the violence caused by the incident or predict that that event will occur and when it occurs, there will be an impact Severity rated into 1-5 and the damage caused by risk **factors in various aspects** by considering how serious it is , as the following table

Table 2-1 Financial Impact

Level Rating	Effect/ Impact	Financial Impact Consideration Criteria	
		Impact on EBIDA targets	Effect the cost
5	Severe	More than 10% of EBIDA	from 5,000,000 baht or more
4	High	5.01-10 % of EBIDA	1,000,000 – 4,999,999 baht _
3	Moderate	1.01-5% of EBIDA	750 ,000 - 999,999 baht
2	Minor	0.51-1% of EBIDA	500,000 - 750,000 baht
1	Possibly	Less than or equal to 0.5% of EBIDA	Less than 500,000 baht

Table 2-2 Operational impact

Level Rating	Effect/ Impact	Consideration Criteria on Operation/Operation Impact	
		The effect causes the process to halt.	Impact on the progress of the project
5	Severe	Business interruption more than 1 month	delay more than 20% of the plan
4	High	Business interruption about 1 month	delay 15-20 % of the plan
3	Moderate	Business interruption for several weeks or significant disruption	delay 10% - 15% of the plan
2	Minor	Partial impact less than 1 month or low impact on an operational process	delay 5% - 10% of the plan
1	Possibly	Not measurable (Negligible impact) or no interruption in the process.	delay less than 5%

Table 2-3 laws / rules / regulations impact

Level Rating	Effect/ Impact	Criteria	
		non-compliance /negligence	impact
5	Severe	suspend business license arising of legal disputes	criminal prosecution / prosecution against organization claims for damages and/or suspension of any transaction other
4	High	loss, penalty, surcharge or an expenditure budget of more than 10 million baht.	internal investigation, expelled / to prosecute a right or a claim, pay fines
3	Moderate	Implementation is not standard controlled. but can fix	Not a serious offense warning or parole / prosecution against legal organizations
2	Minor	expenses exceeding 3 million baht incurred in order to meet regulations, requirements, laws or obligations.	internal investigation / a lawsuit enforced to comply with the law.
1	Possibly	less than 1 million baht	Non-significant impact

Table 2-4 Impact on customers / partners / business partners

Level Rating	Effect/ Impact	Criteria	
		risks or impacts	Satisfaction based
5	Severe	key customers loss, interrupted demand growth.	Dissatisfaction, complaints
4	High	Loss or damaged relationship with key customers, significant cost occurred, interrupted demand growth.	Dissatisfaction, discontinue purchasing, no repetitive purchasing
3	Moderate	Loss or impact to relations, moderate costs occurred	negative comments on products or services or the company's processes.
2	Minor	Very low impact on customer relationships some costs occurred	don't understand and dissatisfied with the quality of the product or the quality of the service provided by the company
1	Possibly	Very few complaints, no cost impact	inconvenient product or services

Table 2-5 Reputation/ corporate image

Level Rating	Effect/ Impact	Criteria for consideration of impacts in name of risk / corporate image
5	Severe	a derogatory or negative news on local and global media, social media, electronic media
4	High	a derogatory or negative news on local media
3	Moderate	Negative news through local media but rectified within 1-3 days
2	Minor	local reputation or stakeholders but not released to the media
1	Possibly	controversial but not go to the public

Key Impact Areas of Corruption Risk

1. Financial Impact

- Loss of assets or funds due to embezzlement or bribery payments.
- Legal expenses and fines resulting from violations of anti-corruption laws.
- Negative effects on profitability and cash flow.

2. Operational Impact

- Delays or disruptions in business processes due to investigations or audits.
- Reduced efficiency and resource wastage caused by non-transparent procurement practices.
- Risk of non-compliance with quality and safety standards.

3. Reputational Impact

- Decline in trust from customers, investors, and business partners.
- Damage to the company's image due to corruption-related news.
- Impacted competitiveness and the ability to attract top talent.

4. Legal and Compliance Impact

- Exposure to lawsuits under anti-corruption regulations.
- Revocation of licenses or business operating rights.
- Blacklisting by government agencies or business partners.

Prioritizes risks

After evaluating the likelihood of occurrence (Likelihood Score) and impact score of various risk factors, the organization should calculate the level of risk (Risk Exposure) to classify the severity of the risk (Degree of Risk) to be a basis for considering the measures to respond to various risks. The calculation is the multiplication of the likelihood and the impact level.

Table 3 Degree of Risk matrix

Risk Matrix							
	Likelihood		x	Impact		Risk Level	
5	5x1	5x2	5x3	5x4	5x5	20-25	Very high
4	4x1	4x2	4x3	4x4	4x5	15-16	high
3	3x1	3x2	3x3	3x4	3x5	10-12	Medium
2	2x1	2x2	2x3	2x4	2x5	5-9	Low
1	1x1	1x2	1x3	1x4	1x5	4-6	Low
	Impact					1-4	Very low
Degree of Risk (D) = Likelihood (L) x Impact (I)							

Risk: D)

Likelihood multiplied by the level of impact (Impact) , which has 3 levels of risk, namely, low, medium and high, with

When evaluating risk across several impact areas, there are two widely used approaches:

1. Average Impact Score
Method:
Sum the impact scores of all dimensions and divide by the number of dimensions.
Advantages:

- Reflects the overall picture of all impact dimensions.
- Suitable when all dimensions have similar importance.

Disadvantages:

- May dilute the severity of a dimension with very high impact.

Formula:

Average Impact = Sum of Impact Scores ÷ Number of Impact Dimensions

2. Maximum Impact Score

Method:
Select the highest impact score among all dimensions as the representative score.

Advantages:

- Emphasizes the most severe impact, suitable for a conservative risk prevention approach.
- Used when even one dimension with high impact is considered high risk.

Disadvantages:

- May overlook the cumulative effect of other dimensions.

Guidelines for Use

- If the organization prioritizes **maximum safety → use Maximum Impact**.
- If the organization wants a **balanced overall view → use Average Impact**.
- Some organizations apply a **Hybrid Approach**, for example:
    - If the highest impact score ≥ 4 → classify as High Risk regardless of average.
    - If not → use the average score for risk level classification.

The Fraud and Corruption Risk Assessment Form: The organization uses **Maximum Impact**, assigning the highest dimension score as the Impact score.

level of risk severity = (Probability of events) x (Effects of events)

Table 4 Level of risk severity (Degree of Risk)

Level Rating	Level Score	Effect/ Impact	Meaning
Very high	16-25	(red)	unacceptable level of risk /Immediate risk mitigation to an acceptable level due to its impact on business operations such as finance, performance, stakeholders or sustainable business operations
High	9-15	(orange)	unacceptable level of risk but probable / risk mitigation to an acceptable level in a given period of time due to its highly likability and impact on most of the business operations.
Medium	10-12	(yellow)	acceptable level of risk/ controlled measures shall be taken to prevent the risk to elevate to a higher level as it may happen sometimes in business.
Low	4-9	(green)	acceptable level of risk/ Low chance of occurrence /controlled measures taken to manage
Very low	1-4	(White)	Low chance of occurrence / acceptable level of risk / acceptable risk level without risk control or additional measures

High-risk activities shall be controlled as corporate risks. Activities associated with medium and low risk can be controlled and mitigated at a departmental level by reporting to the departmental chief and then reporting risk to the Managing Director or Executive Committee to ensure no higher elevating. Risk exceeding level 9 will be upgraded to corporate risk which responsible shall conduct formal risk mitigation and control to report to the managing director or the Risk Management Committee (RMC), respectively.

7. Key risk indicators

There are probably several indicators depending on the cause of risks to measure activities that may associate with risk.

A. Key Risk Indicators: KRI

KRI acts as Early Warning Sign. Good indicator has a Predictable Power to develop as a Leading Indicator to find a way to reduce the chance of occurrence (Lagging Indicator) to find ways to adjust the risk action and control indicators (Control Indicator) to reduce the impact and damage that will affect to the organization.

B. Key Performance Parameter: KPP

KPP is the rating of risk after treatment according to key risk indicators (Key Risk Indicator: KRI), divided into 3 levels:

- **Acceptable - green**

Operations are back to normal situation no probable risk occurred in such area

- **Trigger - yellow**

It is a signal of possible danger or a risk of achieving the organization's objectives in that matter. It is necessary to do something or modify operational strategies to manage those risks.

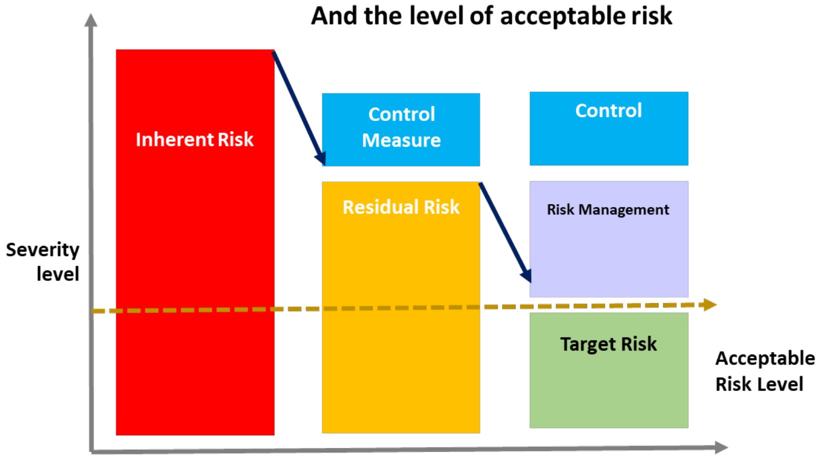
- **Risk - red**

Operation is not in line with the goals and plans greatly. Special attention must be paid to addressing existing problems and obstacles or changing strategies and methods to reduce the impact and the damage that will occur.

8. Implements Risk Responses

Risk Management (Risk Mitigation or Risk Treatment) Measures are taken to prevent the likelihood of risks and mitigate damage from incidents that may occur. A risk management plan is the selection of appropriate strategies to manage each aspect of the risk that the organization is facing. The risk management plan will be presented to the Risk Management Committee (RMC) meeting for consideration and approval of the allocation of resources required by selecting strategies and the most appropriate risk management approach to consider Risk Tolerance and the cost incurred compared with benefits, legal and other requirements as well as the responsibility to society and all groups of stakeholders.

The risk diagram "before treatment" vs "after treatment"
And the level of acceptable risk



2. Risk Management Strategies
1 Accepting the risk (Accept) is to accept the risks arising from operations and organizational decision making. Sometimes businesses choose to accept risks and not spend any resources on avoiding them. The Company might decide to accept a level of risk as benefits of taking the risk greatly outweighs the possible damage.

The cost of treatment is much higher than the potential results of the risk.
2. Risk reduction (Reduce) is to take some action to reduce the likelihood of a risk or mitigate the impact and damage on the organization to an acceptable level
3 Risk avoidance (Avoid) is a cancellation or avoid doing certain activities that may lead to risks that will affect and damage to the organization
4 Risk Transfer (Sharing / Transfer) is a partial or all-risk transferred to other agencies
5 Diversification by implementing multiple options to reduce the risk in the event that one of the options fails.

Key considerations for selecting risk management strategies include the following:

- Assessment of impacts and opportunities based on the implementation of risk management strategies.
To assess each risk management strategy, management must understand that risk management activities that may result in different effects and likelihood of risks, for example:
Hedging exchange rates in advance is an activity that can reduce the impact of exchange rate fluctuations but not be able to reduce the chance of exchange rate fluctuations.

On the other hand, purchasing more from locals can reduce the chances of foreign exchange rate impact but not reduce the impact that may occur etc.

An assessment of the impact and likelihood of risks may change before deciding on choosing a strategy, so that the risk level is in line with the acceptable risk level of the company

- Assessment of costs and returns of implementing a risk management strategy.

Since the company's resources are limited, it is necessary to assess the costs and returns generally incurred. Costs can then be quantitatively calculated by calculating direct and indirect costs. Costs can also be viewed in terms of time and resources needed to perform such risk management strategies. For the sake of returns, other advantages can be included in achieving the relevant objectives.

In case that performing any risk, management activity is not worth the cost , executives may consider to transfer such risks (Sharing) in order to share costs with external agencies such as insurance or joint ventures, etc. executives may choose just one method or a combination of several methods to manage the risk to the desired level.

10. Risk treatment Plan

To predetermine how to choose a strategy to deal with potential risks by specifying which action, how, when, who. Risk management methods include:

1 Risk Acceptance It is acceptable to have a certain level of risk due to the cost of risk management or risk control may cost more than its outcome. But there should be monitoring and supervisory such as determining the acceptable level of impact, preparing a risk management plan, etc.

2 Risk Reduction / Control is to improve the work system or redesign to reduce the chance of occurrence or reduce the impact to an acceptable level such as installing safety equipment, training to develop skills for the operators ,setting proactive measures in various matters, etc.

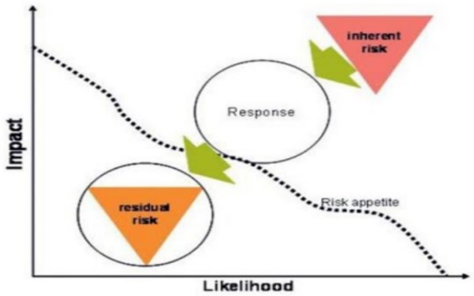
3 Risk Diversification takes relevant corporate assets, sources of income, service providers, raw material sellers types of products sold, markets, customer groups, etc., into consideration to reduce risks associated with over-reliance on income, service providers, return on investment from any one source, etc.

4 Risk Sharing / Risk Transfer reduces potential large losses, such as insuring property to transfer some of the risk to an insurance company, outsourcing suppliers to do some work instead, warranty from sellers such as machinery, electrical equipment, computers installed in corporate projects, etc.

5 Risk Avoidance Stopping or changing events associated with risk such as refraining from risky but unnecessary steps and , modification and reduce the scope of operations, etc.

11. Evaluation of Residual Risk means a risk assessment and management of the Inherent Risk and acknowledges some Treated Risks that can be controlled by risk control measures and acknowledges other remaining risks (Residual Risk) that shall be addressed and opened for monitoring.

The Residual Risk assessment is for the Risk Management Committee (RMC), executives and related persons to aware and understand that the organization may not be able to control or eliminate 100% of all risks. Despite of excellent control measures, there is always a residual risk. Any decision must always be made with awareness and understanding of the this.



12. Control activities are policies and procedures established to help management ensure that risks are managed effectively. As each organization has its own objectives and implementation techniques, the control activities are different. Controls reflect the organization's internal environment, nature of business, structure and culture of the organization. if the information technology involves the operation, the general control of the information technology system and particular controls for each system should be in place.

Type of control activity

1) Preventive control A pre -arranged process or control to reduce the likelihood of adverse outcomes/impacts, e.g.

- segregation of duties
- granting password
- training

2) Detective control is a process or control to identify root cause of error or abnormality that occurs , such as

- Review Report
- Confirmation
- Asset data
- Bug report

3)Corrective control to remedy the damage or reduce damage caused by mistakes or irregularities such as account reconciliation

4) Directive control is An action or control that promotes or encourages the achievement of a desired objective, such as rewarding good performers. Control activities ensure that risk management activities are carried out in an appropriate and timely manner. In some cases, one control activity may be associated with a number of opposite risk management activities. One risk management activity may involve multiple control activities, and in some risk management strategies, a control activity may be the same activity.

Control activities for information technology systems can be grouped into two categories:

- **general control** and
- **system-specific controls** cover information technology infrastructure and management; IT security, procurement of ready-made programs, program development, and maintenance. System-specific controls are designed to ensure the integrity of the data that is recorded and processed correctly and tangibly.

Control activities are important for management in achieving the company's objectives as per its particular set of objectives and their techniques are company-specific; therefore, control activities differ. Control reflects the environment, nature of business, internal structure, company history and culture.

Communication and Training.

The Company has established guidelines for communicating the policy and providing training as part of its approach to prevent various forms of corruption. The framework is as follows:

Communication Guidelines

1. Clear Policy Announcement

- Publish the Anti-Corruption Policy through internal channels such as email, company website, SharePoint system, and the organization's central communication platforms, as well as in the company's annual report.
- Use clear and simple language that emphasizes the importance of compliance.

2. Continuous Communication

- Include anti-corruption practices as part of employee training programs, onboarding sessions for new hires, and annual mandatory training under the Complaint program.

- Develop accessible learning resources for personnel, such as:
  - Sharing short videos, infographics, and FAQs to raise awareness.
  - Communicating through internal channels like Line, BeeKeeper, or other internal communication platforms.

4. **Whistleblowing Channels**

- Communicate to employees the available procedures and channels for reporting instances of corruption, including: Report through the company website's complaint system, email, or designated contacts (see the Whistleblowing Policy for details).

- Ensure confidentiality and protection for whistleblowers.

Training Guidelines

1. New Employee Training, Continuing Staff Training, and Targeted High-Risk Group Training

- Include anti-corruption policy content in the onboarding program.
- Conduct annual training sessions that explain real-life scenarios and the correct procedures to follow.
- Provide access to online training resources to enhance understanding.

Examples of Online Training Resources for Directors, Executives, Employees, Personnel, and Stakeholders:

https://www.youtube.com/watch?v=oCjv9SpV7d8
https://www.youtube.com/watch?v=f2oscZsL3ZM
Online training module.understanding corruption.12 – GIACC (available in multiple languages)

- Employees involved in procurement, sales, and contract management will receive a detailed handbook highlighting risk identification and prevention methods.

2. Post-Training Evaluation

- Conduct quizzes or surveys to measure understanding or monitor actual work practices.
- Evaluate effectiveness by using anti-corruption forms and monitoring complaints or audit results.

Details of the Fraud and corruption risk assessment Document

No.	Document No.	Issued dated	Reference	Description
1	*CS20220801_Manual*	16 May 2023	*CS20220801* CS20201101_Manual	Anticorruption Policy Risk Management Manual
2	*CS20220801_Manual (Rev.1)*	18 November 2025	*CS20220801*	Anticorruption Policy (Review/Revised)
			CS20201101_Manual	Risk Management Manual

Corruption and Fraud Risk Assessment Form

No.	Document No.	Issued dated	Reference	Description
1	*CS20220801_Sheet*	16 May 2023	*CS20220801_Manual*	Anticorruption Policy Risk Management Manual
2	*CS20220801_Form*	16 May 2523	Fraud and corruption risk assessment within SUTHA 's business chain process	

Sample Corruption and Fraud Risk Assessment Form Format

Golden Lime Public Company Limited Fraud and corruption risk assessment within SUTHA 's business chain process			Likelihood (L)	Impact /*(Average only for risk)					Ave. (I)/*	Severity Level (Lx I) Rounded up	Responsible /Relevant unit		Doc#CS20220801_Form
Item	Event	Risk		Operation	Finance	Regulations	Customers	Preventive and control measures			external	internal	Preventive and control measures Risk Assessment date xx/xx/xx

Fraud and corruption risk assessment within SUTHA 's business chain process

The company has developed an assessment form for evaluating corruption risks within the business supply chain processes. This assessment is reviewed periodically based on circumstances or events as appropriate, but at a minimum, it must be reviewed every two years. The process involves identifying various activities related to business operations within the supply chain of the group, which may require adjustments or additions to the assessment framework. Stakeholders in each process are responsible for identifying areas within business operations that may present risk points or factors contributing to potential corruption risks. This identification relies on the experience of operational staff and relevant parties. These identified processes form the basis for conducting and reviewing corruption risk assessments within the business supply chain.

No.	Event / Process	Page No.	Corruption, Bribery, and Embezzlement Risk Assessor							
			GL	Date Assessment / Review	Result Risk Level (Severity Level)		TMC	Date of Latest Assessment / Review	Result Risk Level (Severity Level)	
1	**License**	27								
1.1	Factory License (R.N.4) Renewal Application		K.Panadda	6/10/2025	2	Very low				
	Factory License (R.N.4) Renewal Application			-	-	-	K.Siriluk	10/12/2025	6	Low
	Mineral Processing Plant License GCC TMC			-	-	-	K.Siriluk	10/12/2025	6	Low
1.2	To construct a new building or an extension to an existing structure		K.Panadda	6/8/2025	4	low				
	To construct a new building or an extension to an existing structure_TMC						K.Lumphong	30/1/2025	6	Low
1.3	Apply or renew annual building inspection license.		K.Panadda	30/11/2025	4	low	K.Juthamas	N/A	N/A	
1.4	apply for or renew a license to run a health-hazardous business		K.Panadda	15/10/2025	4	low	K.Nipa	30/8/2025		
1.5	apply for or renew a trademark		K.Thidarat	18/11/2025	1	Very low		-	N/A	
1.6	applying for or renewing a limestone or marble concession certificate		-							
	applying for or renewing a concession certificate-KN		-				Dr.Manop	10/12/2025	6	Low
	applying for or renewing a concession certificate-KK		-				K.Wasun	10/12/2025	6	Low
	applying for or renewing a concession certificate-TK		-				Dr.Manop	10/12/2025	6	Low
2	Sales & Marketing / Project Contract	32					Dr.Manop			
2.1	Selling scrap metal, scrap,unused goods		K.Nutchanok	9/12/2025	6	Low	Dr.Manop	10/12/2025	6	Low
2.2	bidding or auction		K.Somchai	2/12/2025	6	Low	Dr.Manop	10/12/2025	6	Low
2.3	Contracting		K.Somchai	2/12/2025	8	Low	Dr.Manop	10/12/2025	6	Low
2.4	Job inspection		K.Somchai				Dr.Manop	10/12/2025	6	Low
2.5	Approval of changes in work delivery		K.Somchai	2/12/2025	9	Low	Dr.Manop	10/12/2025	6	Low
2.6	Discount approval		K.Somchai	2/12/2025	3	Low	Dr.Manop	10/12/2025	6	Low
2.7	Adding sale orders and sale volumes to achieve KPI targets		K.Somchai	2/12/2025	3	Low	Dr.Manop	10/12/2025	6	Low
2.8	Customs Clearance/Exporting Goods		K.Ekawat				K.Lumphong	10/12/2025	6	Low
2.9	Debt collection and payment follow-up		K.Jintana	9/12/2025	6	Low	K.photjanee	9/12/2025	6	Low
3	Procurement / sourcing / hiring	35	K.Nutchanok	9/12/2025			DR.Manop			
3.1	Buyers / sourcing goods and raw materials						DR.Manop			
3.1.1	Accept gifts, benefits, or hospitality from suppliers or subcontractors.		K.Nutchanok	9/12/2025	6	Low	DR.Manop	10/9/2025	6	Low
3.1.2	Procuring goods that don't meet specifications or ordering too much.		K.Nutchanok	9/12/2025	2	Very low	DR.Manop	10/9/2025	2	Very low
3.1.3	modifying, or falsifying procurement or purchasing records to reflect amounts higher than the actual value		K.Nutchanok	9/12/2025	2	Very low	DR.Manop	10/9/2025	2	Very low
3.2	Sourcing Contractors, Subcontractors - Outsourcing		K.Nutchanok	9/12/2025	9	Low	DR.Manop	10/9/2025		

No.	Event / Process	Page No.	Corruption, Bribery, and Embezzlement Risk Assessor							
			GL	Date Assessment / Review	Result Risk Level (Severity Level)		TMC	Date of Latest Assessment / Review	Result Risk Level (Severity Level)	
	such as transportation or trucks services to deliver goods, etc.									
3.3	Application for investment promotion certificates (pre- start and operation)		K.Panadda	9/12/2025	3	Low	N/A	N/A BOI	N/A BOI	N/A BOI
3.4	Import of all machinery permitted for use in the promoted project		K.Panadda	9/12/2025	3	Low	N/A	N/A BOI	N/A BOI	N/A BOI
3.5	Exemption or reduction of import duty for machinery		K.Panadda	10/12/2025	3	Very low	N/A	N/A BOI	N/A BOI	N/A BOI
3.6	Import of goods						N/A	10/9/2025	3	Very low
3.6.1	Import of coal from overseas sources			18/11/2025	2	Very low		10/9/2025		
3.6.1 (A)	Import of coal from Indonesia		K.Thidarat	18/11/2025	2	Very low	N/A			
3.6.2 (B)	Insurance agent eg; insurance company in Indonesia		K.Thidarat	18/11/2025	5	Low	N/A			
3.6.3 (C)	Shipping company agents for small or medium cargo vessels must be inspected by an authorized agency.		K.Thidarat	18/11/2025	5	Low	N/A			
3.7	Limestone manufacturing subcontractor		K.Wasun	11/12/2025	5	Low				
4	Product delivery	41	K.Pannarat	2/12/2025	9	Low	DR.Manop	10/12/2025	9	Low
5	Screening and employment	42	K.Nisachon	4/12/2025			K.Juthamas	4/12/2025		
5.1	Training courses submission to Labor dept.		K.Nisachon		1	Very low	K.Juthamas		1	Very low
5.2	Hiring people with disabilities		K.Nisachon		1	Very low	K.Juthamas		1	Very low
5.3	monthly payment of contribution and addition		K.Nisachon		-	No impact	K.Juthamas		-	No Impact
5.4	Annual health check		K.Nisachon		1	Very low	K.Juthamas		1	Very low
5.5	Hiring expats / - Visa application / Renewal / - Work permit application		K.Nisachon		2	Very low	K.Juthamas		2	Very low
6	Environmental control	44	K.Jetsita	8/12/2025			DR.Manop			
6.1	A permit to remove sewage or non-hazardous materials for disposal such as rags/paper/ contaminated containers, or waste lubricating oil, etc.		K.Jetsita	8/12/2025	4	Low	K.Juthamas	10/12/2025	4	
6.2	A permit to remove sewage or unused material that is not hazardous waste for disposal such as scrap metal, scrap wood etc.		K.Jetsita	8/12/2025	4	Low	K.Juthamas	10/12/2025	4	
6.3	Environmental and safety report		K.Jetsita	8/12/2025	4	Low	K.Nipa	10/12/2025	6	
7	Taxation process	46	K.Amornphan				K.Photjanee			
7.1	Tax refund		K.Amornphan				K.Photjaneee	10/12/2025	3	Very low
7.2	Tax payment		K.Amornphan		6	Low	K.Photjaneee	10/12/2025	6	Low
8	Accounting and Financial control	47	K.Amornphan				K.Photjaneee	9/12/2025		
8.1	payment authorization documentation		K.Amornphan				K.Photjaneee	9/12/2025	1	Very low
8.2	Recording of accounting entries		K.Amornphan				K.Photjaneee	9/12/2025	4	Low
8.3	Purchasing and paying suppliers		K.Amornphan				K.Photjaneee	9/12/2025	4	Low
8.4	Petty cash and advance payment processes and disbursement of operating expenses		K.Amornphan				K.Photjaneee	9/12/2025	2	Very low
8.5	Fixed Asset Process		K.Amornphan				K.Photjaneee	9/12/2025	0	No impact
8.6	Inventory and inventory processes		K.Amornphan				K.Photjaneee	10/9/2025	4	Low

Golden Lime Public Company Limited Fraud and corruption risk assessment within SUTHA 's business chain process			Likelihood (L)	Impact /*(Average only for risk)					**Max Score** (I)/*	Severity Level (Lx I)	Responsible /Relevant unit		Doc#*CS20220801_Form*
No.	Event	Risk		Operation	Finance	Regulations	Customers partners	Reputation			external	internal	Preventive and control measures Risk Assessment date 10 December 2025
1.	<u>License</u>												
1.1	To apply for Factory License (R.N.4) Renewal	- authority representative asks for compensation or other benefits for - expedite the process - complete renewal before the license expires - certify the audit as required by law.	2	2	2	3	3	2	3	6 Low	Provincial industrials office Lopburi / Saraburi	Plant admin (Ms.Panadda)	Ror.Ror.4 - Pay Yearly fee annually - Renew every 5 years - Master List to monitor license expiry date - budget allocation for each requirements
1.1.1	To apply for Factory License (R.N.4) Renewal_TMC	-Ensure timely renewal before the license expires - Ensure the company passes the inspection	1	2	2	2	2	2	2	2 Very low	Provincial industrials office Lopburi / Saraburi	TMC K.Siriluk	-Prepare and maintain a register report for the renewal of various licenses
1.1.2	To apply Mineral Processing Plant License GCC TMC	-Ensure timely renewal before the license expires - Ensure the company passes the inspection	1	2	2	2	2	2	2	2 Very low	Provincial industrials office Lopburi / Saraburi	TMC K.Siriluk	-Prepare and maintain a register report for the renewal of various licenses - Record fees and expenses regularly and keep them updated.
1.2	to build a building or building extension	- to bring up an offense in case of non-compliance with the requirements; and -to issue a license within the deadline	1	2	2	3	2	1	3	3 Very low	Municipality/Subdistrict Administrative office in the area where the establishment is located (Mechanic Division)	Plant admin (Ms.Panadda)	- a written workflow to apply for a permission - an operational plan by the plant management to renewal license as per the annual budget allocation on related factory licenses
	to build a building or building extension_TMC		1	1	1	1	1	1	1	1 Very low		TMC K.Jutamas	
1.3	apply for or renew an annual building inspection license		2	2	2	3	2	1	3	6 Low	Local Municipality/Subdistrict	Plant admin (Ms.Panadda)	-Schedule tasks proactively; urgent requests must obtain prior special approval.

Golden Lime Public Company Limited **Fraud and corruption risk assessment within** **SUTHA 's business chain process**			Likeli hood (L)	Impact /*(Average only for risk)					**Max Score** (I)/*	Severity Level (Lx I)	Responsible /Relevant unit		Doc#*CS20220801_Form*
No.	Event	Risk		Opera tion	Fi nance	Regula tions	Customers partners	Repu tation			external	internal	Preventive and control measures Risk Assessment date 10 December 2025
			2	2	2	3	2	1	3	6 Low	Administration (Mechanic Division)	TMC K.Jutamas	
1.4	apply for or extend a license to operate a business that is harmful to health		2	2	1	3	3	2	3	6 Low	Local Municipality/Subdistrict Administration (Mechanic Division)	Plant admin (Ms.Panadda)	
			2	2	1	2	2	3	3	4 Low		TMC K.Nipa	
1.5	applying for or renewing a trademark		1	1	0	1	0	1	1	1 Very low	Department of Intellectual Property	Office admin (K.Thidarat)	-The “Rhino” and “Mountain” trademarks are renewed every 10 years. -The EOD trademark belongs to GLE. K.Kannika responded to the duty renew.
1.6	Application for or renewal of a limestone /marble concession certificate		1	5	5	3	2	1	5	5 Low	Independent consulting firm	Thai Marble Co., Ltd. (Subsidiary) managed by a contractor	In accordance with the terms of the service contract.
2.	Sales and Marketing												
2.1	Selling scrap metal, scrap, unused goods, debris, assets, old vehicles, old machinery, or unused items.	-Deliberate undervaluation of assets to favour specific buyers -Insufficient transparency in the buyer selection process -Misrepresentation regarding asset damage and loss -Lack of defined procedures or formal approval processes	3	2	1	2	2	2	3	6 Low	customers either government or private sectors	Procurement, Production, Finance Dept. (Ms.Amornpan)	- auction every 3 months - guarantee deposit payment - at least 2 executives or management level from at least 2 departments are required to approve all transaction -In the case of assets such as vehicles, conduct an auction and make a clear announcement. -Appraise/assess the market value before setting the initial price. -Set a schedule for bid opening and establish a committee
			2	1	1	1	1	2	2	4 Low	customers either government or private sectors and Temple	TMC – The appointed team responsible for execution.	

Golden Lime Public Company Limited Fraud and corruption risk assessment within SUTHA 's business chain process			Likeli hood (L)	Impact /*(Average only for risk)					Max Score (I)/*	Severity Level (Lx I)	Responsible /Relevant unit		Doc#*CS20220801_Form*
No.	Event	Risk		Opera tion	Fi nance	Regula tions	Customers partners	Repu tation			external	internal	Preventive and control measures Risk Assessment date 10 December 2025
													composed of representatives from multiple departments. -Define a clear process for payment into the company's account.
2.2	Project bidding; or auction	Improper advantages; unlawful rebates, bribes, kickbacks, and undisclosed payments. -Selecting contractors due to personal relationships and providing them with unfair benefits. -Choosing material specifications inconsistent with the agreement -Claiming extra payments for unneeded work	3	2	2	-	-	2	2	6 Low	customers either government or private sectors	K.Somchai	Previously, Golden Lime PLC's Sales Department did not hold contractor auctions. Occasional auctions with government agencies were minimal, transparent, and entirely free of bribery.
			3	2	2	-	2	2	2	6 Low	customers either government or private sectors and Temple	TMC Dr.Manop	
2.3	Contracting	- Determining terms and conditions in favor for the benefit of the company ; payment , delivery	4	2	2	2	2	2	2	8 Low	customers either government or private sectors	buyers / purchaser / accountant corporately asses	- Code of Business Ethics - Anti-Corruption Policy - Whistleblowing Policy - Review and assessment of fraud risks - For various contracts, there is a template or a standard draft of a contract for guidance to be used in various cases. The draft has been reviewed by legal experts to assess both the completeness under the relevant laws and the best interests of the company to be used as a standard draft. - In the case of an important
			4	2	2	2	2	2	2	8 Low		TMC Dr.Manop	
2.4	Job inspection	- collusion under imperfect / noncompliance result	4	2	2	2	2	2	2	8 Low			
			4	2	2	2	2	2	2	8 Low		TMC Dr.Manop	

Golden Lime Public Company Limited Fraud and corruption risk assessment within SUTHA 's business chain process			Likeli hood (L)	Impact /*(Average only for risk)					**Max Score** (I)/*	Severity Level (Lx I)	Responsible /Relevant unit		Doc#*CS20220801_Form* Preventive and control measures Risk Assessment date 10 December 2025
No.	Event	Risk		Opera tion	Fi nance	Regula tions	Customers partners	Repu tation			external	internal	
2.5	Approval of changes in work delivery	- Approval is false, unreal	3	1	3	2	2	2	3	9 Low		K.Somchai	contract, the draft will be submitted to a legal advisor to review the conditions and contractual obligations to cover in order to reduce risks and maximize benefits to the Company
			3	1	3	2	2	2	3	9 Low		TMC Dr.Manop	
2.6	Discount offering	- Discounts are given without clear verification or an approval process. - Discounts are provided for personal gain.	1	1	3	2	3	3	3	3 Low		K.Somchai	-Establish a clear policy for granting discounts and provide documented procedures for approving credit note issuance, including justification for each case.
			2	1	3	2	2	2	3	6 Low		TMC Dr.Manop	
2.7	Adding sale orders and sale volumes to achieve KPI targets	- Creating sales orders, deliveries, or invoices to inflate sales figures for KPI targets or commission.	1	1	3	2	3	3	3	3 Low		K.Somchai	-Commission payment is not applicable; sales targets are therefore unrelated to commission earnings. -Each department—Sales, Delivery, and Warehouse—has specific responsibilities, ensuring that issuing invoices and delivery notes is managed separately through distinct processes. The creation of delivery notes and invoices follows a clear and organised division of duties. Furthermore, cash sales and payments are not permitted under current policies.
			2	1	3	2	2	2	3	6 Low		TMC Dr.Manop	
2.8	Customs Clearance/Exporting Goods	- Personnel offering bribes or other benefits to officials to expedite the goods from the port faster than usual, or the declaration of false items that mismatch	1	1	2	1	0	1	2	2 Very low	Customs	Export personnel cooperate with external expert (Mr.Eakawat)	- procedures in export sales - hiring external expert in international shipping - HS Codes of the company for assignment and verification

Golden Lime Public Company Limited Fraud and corruption risk assessment within SUTHA 's business chain process			Likelihood (L)	Impact /*(Average only for risk)					Max Score (I)/*	Severity Level (Lx I)	Responsible /Relevant unit		Doc#*CS20220801_Form*
No.	Event	Risk		Operation	Finance	Regulations	Customers partners	Reputation			external	internal	Preventive and control measures Risk Assessment date 10 December 2025
		imported goods or declarations											
		- Sales or export officials try to underestimate the import tax of the destination country through DAP	1	1	2	1	0	1	2	2 Very low			
		-Company employees or representatives acting on behalf of the company must not offer or promise to give bribes or other benefits to government officials to expedite the release of goods from the port faster than usual, or to make false declarations that do not match the actual goods or import documents.	1	1	2	1	0	1	2	2 Very low		-Export Sales Department: K. Thananon / K. Lampong TMC	-Procedures for selling products to export markets.
		- Sales or export staff must not attempt to undervalue import duties in the destination country when shipping goods under DAP (Delivered at Place) terms.	1	1	2	1	0	1	2	2 Very low		-Export Sales Department: K. Thananon / K. Lampong TMC	-Procedures for selling products to export markets.
2.9	Debt collection and payment follow-up	-Falsifying project progress documents to claim payments -Paying contractors who did not fulfill their contractual obligations -Receiving payments into a personal account instead of the company account	3	3	3	1	1	2	2	6 Low			

Golden Lime Public Company Limited Fraud and corruption risk assessment within SUTHA 's business chain process			Likeli hood (L)	Impact /*(Average only for risk)					Max Score (I)/*	Severity Level (Lx I)	Responsible /Relevant unit		Doc#*CS20220801_Form* Preventive and control measures Risk Assessment date 10 December 2025
No.	Event	Risk		Opera tion	Fi nance	Regula tions	Customers partners	Repu tation			external	internal	
			3	0	2	0	2	0	2	6 Low		TMC K.Photjanee	
3.	Procurement / sourcing / hiring												
3.1.1	Buyers / sourcing goods and raw materials domestic	- accept offers of gifts, benefits or hospitality from those who submit bids that vary significantly from others or choose a supplier whose bid was well above the expected cost/favor a quick procurement over following proper process	3	2	1	2	2	2	2	6 Low	customers either government or private sectors	Procurement (Ms.Natchanok)	- Business Ethics / Procurement Code of conduct - Internal guideline and control for each serial process; receiving raw materials, production, delivery with a clear authority between the requester, the approver, and the bookkeeper via Win speed program - Accounting system and internal controls, separated process between vendors and money collector including payment evidence
			3	2	1	2	2	1	2	6 Low		TMC Dr.Manop	
3.1.2		- choose a supplier whose bid was well above the expected cost/non-compliant product or raising purchase orders after receiving invoices	1	2	1	1	2	2	2	2 Very Low		Procurement (Ms.Natchanok)	
			2	2	2	2	2	2	2	2 Very Low		TMC Dr.Manop	

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No.	Event	Risk		Opera tion	Fi nance	Regula tions	Customers partners	Repu tation			external	internal	Preventive and control measures Risk Assessment date 10 December 2025
3.1.3		- unusually higher price offer in order for price gap benefit	1	2	1	1	2	2	2	2 Very Low		Procurement (Ms.Natchanok)	
			1	2	1	1	2	2	2	2 Very low		TMC Dr.Manop	
3.2	- Sourcing Contractors, Subcontractors - Outsourcing such as transportation or trucks services to deliver goods, etc.	- Authorized personnel seeks unlawful benefits for themselves or others from contractors/service providers by allowing them to work aside the process of procurement.	4	1	3	2	2	2	2	8 Low	Private sectors contractors	Logistics Dept. and planning (Ms.Natchanok) TMC DR.Manop	- Selection criterion and process for sourcing suppliers - Procurement flow ; price comparison, bidding
			3	1	3	2	2	2	3	9 Low		TMC Dr.Manop	
3.3	Application for investment promotion certificates (pre-start and operation)	- Offer benefits to responsible staff to speed up the promotion certificate approval process	2	3	1	2	2	2	6	6 Low	BOI	Plant admin (Ms.Panadda)	- workflow of BOI application - Submit online to BOI
3.4	Import of all machinery permitted for use in the promoted project	- Offer benefits to responsible staff to expedite customs procedures or formalities to shorten the time , pay less	1	3	2	2	0	1	3	3 Very low	customs / BOI	selected contractors or outsourced agent work with (Mr. Ekkawat) and financial accounting department)	Guidelines for Importing Goods from Overseas - The importation of goods must comply with the Customs Act, the Customs Tariff Act, and all applicable regulations, rules, and standards. Proper adherence to these guidelines eliminates the possibility of bribery. Inspections are mandatory before any goods can be imported.
3.5	Exemption or reduction of import duty for machinery	- Offer benefits to officials by asking for approval to import machinery or equipment speedily or high taxed imports to pay less tax	1	3	2	2	0	1	3	3 Very low	customs / BOI		

Golden Lime Public Company Limited Fraud and corruption risk assessment within SUTHA 's business chain process			Likeli hood (L)	Impact /*(Average only for risk)					**Max Score** (I)/*	Severity Level (Lx I)	Responsible /Relevant unit		Doc#*CS20220801_Form*
No.	Event	Risk		Opera tion	Fi nance	Regula tions	Customers partners	Repu tation			external	internal	Preventive and control measures Risk Assessment date 10 December 2025
3.6	Import of goods	-Bribery may be used to secure the release of goods or specific raw materials that require special clarification or authorization. It can also involve prohibited items, making false statements, concealing the actual tax rate, or declaring a lower price to obtain improper tax deductions.	1	3	2	2	0	1	3	3 Very low	Customs	Finance Accounting / procurement and Mr. Ekkawat	- In the rare case that, after goods have been imported, a customs officer's assessment or interpretation conflicts with the company's declaration leading to the company's arrest, no bribes should be offered to ensure adherence to the laws or regulations. For instance, if the tariff is found to be incorrect and additional taxes are necessary, those taxes must be paid. If a permit is needed, the appropriate agency must be contacted to secure the correct permit.
			3	3	2	2	0	1	3	9 Low		TMC Dr.Manop	
3.6.1	Import of coal from overseas sources		1	2	2	2	2	2	2	2 Very low		K.Thidarat	
3.6.1 (A)	coal imports from Indonesia	- Reliable sources, providers and agents		1	5 ve nd or	3	3	1	1	5	PremThai Energy	K.Thidarat	
3.6.2 (B)	In 2023, coal imports from Indonesia require risk insurance from a local provider and a vessel inspection before coverage is granted. - When importing goods from Indonesia, make sure the ship has been physically inspected instead of just	- Indonesian law mandates coal insurance be managed by local companies, but agents may not always clearly disclose information or liability details, particularly in cases of shipping damage.	1	5	3	3	5 Indo nesi an Insu rer	4	5	5 Low		K.Thidarat	

Golden Lime Public Company Limited **Fraud and corruption risk assessment within** **SUTHA 's business chain process**			Likelihood (L)	Impact /*(Average only for risk)					**Max Score** (I)/*	Severity Level (Lx I)	Responsible /Relevant unit		Doc#*CS20220801_Form*
No.	Event	Risk		Operation	Finance	Regulations	Customers partners	Reputation			external	internal	Preventive and control measures Risk Assessment date 10 December 2025
	depending on paperwork checks.												
3.6.3 (C)	Authorized inspection companies are required to carry out vessel condition inspections for small and medium-sized cargo ships.	Only reputable, recognized agents or inspection companies should be used to ensure vessel inspections meet standards and provide valid documentation for insurance during coal transport.	1	5	3	4	5	4	5	5 Low		K.Thidarat	
3.7	Limestone contractor	- Report exaggerated production figures - Steal products for personal sale - Report inaccurate quantities for each type of limestone produced	1	5	3	4	3	4	5	5 Low		K.Wasan	-Stock is measured monthly to ensure production quantities are accurate. -Extra CCTV cameras monitor entry and exit in the goods receiving area. -Production amounts are verified at the scales and recorded following clear procedures.

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No.	Event	Risk		Opera tion	Fi nance	Regula tions	Customers partners	Repu tation			external	internal	
4.	Product delivery												
	- Delivery of goods to customers	- Violating traffic rules for driving at a speed beyond the law, overloading, and bribing, unqualified personnel bribes for any offense ,logistics queue-jumping for high-priced goods in particular.	3	1	1	3	1	1	3	9 Low	External Supplier	Logistics (Ms.Pannarat)	- Establish prohibitions regarding bribery, gifts, and conflicts of interest, with employees required to sign an acknowledgment. - effective management of queue in different locations using GPS as a medium - Segregation of Duties: Separate the roles of the person planning the shipment, the person approving transportation costs, and the person performing the inspection. - Use electronic documents with timestamps to prevent tampering. - Audited fuel, electricity, and maintenance expenses.
			3	1	1	3	1	1	3	9 Low		TMC K.Lumpong	
5.	Screening and employment												
5.1	- Training courses submission to Labor dept.	- A bribery for non-compliance	1	1	1	1	1	1	1	1 Very low	Provincial Skill Development Center	HR Dept. Ms. Nisachon	- Annual work plan - work procedure - training courses provided at no cost by Association of Listed Companies. , the Office of the Securities and Exchange Commission and the Stock Exchange of Thailand including free online training courses
			1	1	1	1	1	1	1	1 Very low		HR TMC K. Jutamas	
5.2	- Hiring people with disabilities	- A bribery for non-compliance	1	1	1	1	1	1	1.0	1 Very low	Office of Social Development and Human Security	HR Dept. Ms. Nisachon	
			1	1	1	1	1	1	1	1 Very low		HR TMC K. Jutamas	

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No.	Event	Risk		Opera tion	Fi nance	Regula tions	Customers partners	Repu tation			external	internal	
5.3	- monthly payment of contribution and addition	- a bribery for noncompliance to Social Security Act BE 2533 1990	0	0	0	0	0	0	0	0 No impact	Social Security office	HR Dept. Ms. Nisachon	- Monitor and control payroll over the Thai soft program
			0	0	0	0	0	0	0	0 No impact		HR TMC K. Jutamas	
5.4	- Annual health check	- A bribery for noncompliance in pre-employment health check-ups and annual health check-ups according to the regulations of the Ministry of Labor	1	1	1	1	1	1	1	1 Very low	Hospitals	HR Dept. Ms. Nisachon	- Annual plan and procedure - Annual budget allocation for health checkups program according to age and gender
			1	1	1	1	1	1	1	1 Very low		HR TMC K. Jutamas	
5.5	- Hiring expats - Visa application / Renewal - Work permit application/Renewal - Notification of staying in the Kingdom over 90 days	-Bribing to bypass immigration or labor laws -Offering incentives to officials for faster permits -Requesting leniency for regulatory non-compliance -Paying to avoid penalties for employing unauthorized foreign workers	1	1	1	2	0	2	2	2 Very low	- Immigration Bureau - Provincial labor office - Visa One Stop Service (BOI)	HR Dept. Ms.Kannika/ Ms.Panchalee	- Master plan to monitor application and renewal - Visa and work permit process - Annual plan for Visa and work permit - back up documents
			1	1	1	2	0	2	2	2 Very low		HR TMC K. Jutamas	
6.	Environmental control												
6.1	- A permit to remove sewage or non-hazardous materials for disposal such as rags/paper/ contaminated containers, or waste lubricating oil, etc.	- A bribe offer to bureaucrats who issue permits	2	1	1	2	1	2	2	4 Low	Office of Industrial Waste Management ,Local authorities, and private contractors who have a waste carriers license	Plant Admin (Ms.Jetsita) /	- procedures to monitor data input while issuing invoices of hazardous waste shipment
			2	1	1	2	1	2	2	4 Low		HR.TMC K. Jutamas	
6.2	- A permit to remove sewage or unused material that is not hazardous waste for disposal	- a supplier may pay or accept a bribe in connection with such scrap materials or personnel paying a bribe for	2	1	1	2	1	2	2	4 Low		Plant Admin (Ms.Jetsita) /	

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No.	Event	Risk		Opera tion	Fi nance	Regula tions	Customers partners	Repu tation			external	internal	Preventive and control measures Risk Assessment date 10 December 2025
	such as scrap metal, scrap wood etc.	not complying with relevant applicable laws and regulations	2	1	1	2	1	2	2	4 Low		HR.TMC K. Jutamas	
6.3	- Environmental and safety report such as - Effluent Analysis - dust and contaminated air - noise detection - crane works - electrical equipment - safety electrical system - health check-up - risk from work - building inspection control and signage.	- Personnel wrongfully offering to give bribes or other benefits to the officer in case of non-compliance with the requirements	2	1	1	3	2	1	1.6	3 Low	certified environmental impact and safety assessment agency	(Ms.Jetsita) / Safety (Mr.Theerapong) / Each Plant Manager	- control measures in place such as - dust removal, light, sound and energy management, etc. - annual internal audit and surveillances audit by URS for various ISO standards for environment, safety and energy
			2	1	1	3	2	1	3	6 Low		TMC K. Nipa	
7.	Taxation process												
7.1	tax refund - VAT refund	- Personnel offering or accepting bribes or other benefits to claim tax refunds by forging the account, tax report, sales tax, filing P.P. 30 form incorrectly	1	0	3	0	0	0	3.0	3 Low	revenue department & local revenue office	Accounting K.Amornpan	- segregation of duties according to the internal control process - monitoring system on tax reports, sales tax, and original documents - a review of the report.
			1	0	3	0	0	0	3	3 Low		TMC Accountant K. Photjanee	
7.2	tax payment - property and land tax, signboard tax, and local maintenance tax	- Paying bribes to reduce taxes or not to pay tax	2	3	3	2	2	2	3	6 Low	municipality SAO	Plant Admin (Ms.Panadda)	- Yearly plan for annual payment
			2	3	3	2	2	2	3	6 Low		TMC Accountant K. Photjanee	
8	Accounting and financial control												
8.1	payment authorization documentation	Employees might falsify payments or transfer funds to unauthorized accounts.	1	1	1	0	0	0	1	1 Very low		GL_K.Amornpan	-Duties should be clearly segregated among individuals responsible for preparing, reviewing, and approving. -An electronic approval system must be used to track approval
			2	0	1	0	0	0	1	2 Very low		TMC Accountant K. Photjanee	

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No.	Event	Risk		Opera tion	Fi nance	Regula tions	Customers partners	Repu tation			external	internal	Preventive and control measures Risk Assessment date 10 December 2025
													history, provide audit capabilities, and ensure account controls for accurate verification. -Every adjustment must include thorough documentation and justifications. -Adjustment entries must be reviewed by a senior manager, accounting executive, or auditor.
8.2	Recording of accounting entries	-Making changes to account balances, like assets or liabilities, without having documentation to support the adjustments - Making journal entries without adequate review	2	1	1	0	0	0	1	2 Very low		GL_K. Amornpan	- Require that all modifications be accompanied by supporting documentation and clear justification.
			2	0	2	0	0	0	2	4 Low		TMC Accountant K. Photjanee	
8.3	Purchasing and paying suppliers	- Fraudulent suppliers or duplicate payments - Creating new vendors without verification	2	0	2	0	0	0	2	4 Low		GL_K. Amornpan	Suppliers are validated using identity documents and procurement information. Only authorized staff can create new vendor accounts. Payments are processed through an ERP system and online banking, both with built-in controls.
			2	0	2	0	0	0	2	4 Low		TMC_K.Podjanee	
8.4	Petty cash and advance payment processes and disbursement of operating expenses	- Cash withdrawals without actual use - Withdrawals exceeding actual payments - Creating counterfeit receipts	1	1	2	1	0	0	1.3	1 Very low		GL_K.Amornpan	- Petty cash policy is established and monitored, with designated individuals responsible. Expenses and balances are reviewed monthly and annually.
			1	0	2	2	0	0	2	2 Very low		TMC_K.Podjanee	
8.5	Fixed Asset Process	-Recording non-existent assets -Disposing of or transferring assets without approval	0	1	0	0	0	0	1	0 No impact		GL_K.Amornpan K.Bunyawhad	-Periodic physical verification and inspection of assets are carried out.
			0	0	0	0	0	0	0	0 No impact		TMC_K.Podjanee	

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No.	Event	Risk		Opera tion	Fi nance	Regula tions	Customers partners	Repu tation			external	internal	
		- Changing asset life or depreciation to adjust profits											-Significant high-value assets require approval through the Capex process in accordance with Capex policy. - In cases of disposal of non-essential assets, the process must go through approval and receive endorsement from a designated committee - The assessment of asset useful life must strictly follow policies and accounting standards. - regular random checks of the asset system by internal control auditors.
8.6	Inventory and inventory processes	-Inventory records differ from actual stock. - Inventory taken without inspection. - Inventory value changed without documentation.	2	2	1	2	0	1	1.5	3 Very low		GL_K.Amornpan K.Bunyawhad	- Duties are segregated. - Physical inventories are counted regularly. - Actual counts are matched to reported data.
			2	2	2	2	0	1	2	4 Very low		TMC_K.Podjanee	- External auditors verify bulk goods using specialized internal staff and measurement tools, with supporting reports from outside experts. -Inventory held by subcontractors is routinely monitored; contracts address compensation for any losses. -Auditors periodically check and count inventory to match records with physical stock.