



บริษัท เอเชียन มารีน เซอร์วิสส์ จำกัด (มหาชน)

ASIAN MARINE SERVICES PUBLIC COMPANY LIMITED

Policy and Guidelines for Anti-Corruption in Procurement

Asian Marine Services Public Company Limited (“the Company”) conducts its business with integrity and is committed to social responsibility and all stakeholders, guided by good corporate governance principles. The Company operates with transparency and ethics under sound corporate governance practices and strictly complies with laws pertaining to the prevention and anti-corruption.

The Company has established a policy outlining responsibilities, practices, and requirements for appropriate conduct to prevent fraud and corruption in all of its business activities. To ensure that decisions and business operations that may carry a risk of fraud and corruption are prudently considered and implemented, the Company has developed an **Anti-Corruption Policy** to serve as clear operational guidelines for conducting business.

Definitions

Fraud: Refers to the seeking of unlawful benefits for oneself or others.

Corruption: Refers to the act of promising to give, accepting, or soliciting assets—whether in the form of documents, information, money, or other improper benefits, to cause a person to perform or exempt an act, in order to obtain or retain any business or improper advantage for oneself, associates, or the Company, directly or indirectly. This also includes any actions that violate the Company’s Code of Conduct, such acts include:

- a. Giving and receiving gifts, hospitality, and other forms of service refer to all expenses incurred for items, hospitality, and expenses related to the aforementioned that possess monetary value, including anything exchangeable for goods or services. Waiving the right to accept items or services the Company is entitled to receive refers to foregoing benefits from customers, business partners, and/or other business associates, regardless of their financial value.
- b. Illegal political assistance refers to financial support or services of any kind provided in violation of the law.
- c. Charitable donations/various sponsorships refer to the donation or sponsorship of money, objects, or other benefits to individuals or legal entities with unlawful hidden objectives, or sponsorships for the donor’s business, brand, or reputation.

Operational Guidelines in Accordance with the Policy and Guidelines for the Prevention of Corruption in Procurement

1. The Board of Directors is responsible for formulating and supervising anti-corruption policies to ensure their effectiveness and efficiency, and for ensuring that management is fully aware of and prioritizes these policies. In the event of reported fraud and corruption, management is responsible for providing consultation, recommendations, and determining appropriate penalties based on the reports submitted.

2. Executives and designated personnel have the duty to audit the lines of work or departments under their responsibility and supervision by conducting risk assessments to identify potential fraud and corruption vulnerabilities. This ensures these responsible lines of work have the minimum or zero risk of fraud and corruption, and they collaborate on developing measures to close such risks if present in the organization.

3. Executives, supervisors, or designated personnel have the duty to comply with policies and audit plans, and submit risk assessment reports concerning potential fraud and corruption within the divisions or units under their responsibility to the Audit Committee.

4. Executives and supervisors must clearly communicate with personnel in the organization or parties related to the organization thoroughly, along with creating an understanding regarding the anti-corruption policy.

5. Executives, supervisors, employees, and all parties associated with the Company must strictly comply with the anti-corruption policy, upholding the code of conduct in working. They must not engage in any form of fraud and corruption, whether directly or indirectly, and will not be subject to any penalties – including demotion or other negative repercussions – for refusing corrupt practices, even if doing so results in lost business opportunities for the Company.

a. Not giving and not receiving any objects, gifts, hospitality, services, assets, or other benefits from individuals or entities whom one contacts and coordinates with, including both government, private sectors, or any other agencies, in order to induce the exemption of the performance of duties of oneself and others.

b. Not acting as an intermediary to offer any benefits—whether financial, objects, or any assets—to anyone involved in the business in exchange for privileges that should not be acquired.

6. Executives and employees must not ignore or overlook when witnessing acts possessing characteristics of corruption involving the Company. They should report such instances to their supervisors or those responsible and cooperate with any fact-finding investigation.

7. In procurement processes, strict compliance with procurement regulations is essential to ensure transparency and auditability at every stage.

8. Executives and employees must not take any action that could cause the Company to be seen as politically biased. The Company is an organization that adheres to political neutrality and supports compliance with laws and administration under the democratic regime of government with the king as head of state. The Company does not support any political party, directly or indirectly.

9. Expenditures for business hospitality and other expenditures related to business contract compliance are allowed, provided they are reasonable and do not lead to suspicion of corruption, and be accountable.

10. Donations or sponsorships for various projects are permitted, but must be made in the Company's name only. These donations, whether to projects or charitable organizations, must be credible projects or entities that are accountable, and any disbursements must have clear objectives and must be processed through correct disbursement steps in accordance with the regulations of the Company.

11. The Board of Directors will regularly review operational guidelines and operational measures to align with changes in laws and business operational conditions.

Corporate Communication

To ensure all personnel in the organization are informed of the policies and guidelines for preventing corruption in procurement, the Company will publish its anti-corruption policy through its communication channels, including email, the Company website at www.asimar.com, and the Company's social media platforms.

Channels for whistleblowing or filing complaints about fraud and corruption.

Individuals who witness suspected fraudulent or corrupt practices can report them to the company directly or indirectly through the reporting channels outlined in this policy. Reporters must provide details of the matter they are reporting, along with supporting evidence or sufficient information for investigation, and include their name, address, and contact phone number. Please submit information through the following channels:

Complain through the Internal Auditor at Tel: (662) 815 2060 ext. 2995 or email: audit@asimar.com.

Complain through the Company Secretary at Tel: (662) 815 2060 ext. 2994 or email: auychai_ti@asimar.com.

By post, Audit Committee

Asian Marine Services Public Company Limited

128 Moo 3, Suk Sawat Road, Laem Fah Pha Subdistrict, Phra Samut Chedi District

Samut Prakan 10290

Penalty Provisions

Any employee or business-related individual who violates or fails to comply with the anti-corruption policy and guidelines for the prevention of corruption in procurement will be subject to severe disciplinary action, including termination of employment or contract cancellation, as applicable. Additionally, they may be subject to prosecution under relevant anti-corruption laws, and the Company will be the party to determine appropriate penalties.

Asian Marine Services Public Company Limited

Signed~~Signature~~..... Chairman of the Board of Directors

(Mr. Prakrit Pradipasen)

February 28, 2023