

08 June 2018

Subject: Refraining from giving gifts to management and employees

To: Managing Director, Company's business partner, and related parties


Enclosure: The Company's Anti-Corruption Policy

The Company has focused on business practices under good corporate governance principles, ethics, and transparency operation, including equal treatment to related parties and stakeholders. The Company has also signed the Declaration of Intent to Anti-Corruption with the Thailand's Private Sector Collective Action against Corruption

To establish a good work practice, the Company has encouraged all managements and employees to perform their duty without any incentives. In this connection, the Company would like to seek for your corporation in not giving a gift to the managements or employees of the Company, whether in the New Year or in any occasions.

We would like to take this opportunity to thank you for your kind cooperation.

Yours faithfully



Mr. Amrendra Prasad Choudhary
Chief Executive Officer

(Unofficial Translation)

Announcement HO. 017/2560

Subject: Anti-Corruption Policy of G J Steel Public Company Limited

G J Steel Public Company Limited (“**Company**”) places an importance on the business operation with honest, taking responsibility for society and its stakeholders. The Company also adheres to the principles of good governance, Code of Conduct of the Company (“**Code of Conduct**”) for its business operation, including in compliance with requirements of laws strictly. In this connection, the Company has imposed an Anti-Corruption policy (“**Anti-Corruption policy**”), and communicated with all directors, executives and employees of the Company for enhancing their knowledge and understanding of the importance of Anti-Corruption policy. As a result, all directors, executives and employees of the Company have been involved and recognized of the implementation of imposed practices in the Company’s business operation.

The Anti-Corruption policy is an additional to the Company’s Code of Conduct for its business operation, in which already been considered and approved by the Board of Directors.

1. Objectives

- 1.1 To represent the Company’s intention and commitment in opposition to any forms of corruptions, either directly or indirectly.
- 1.2 To define responsibilities, guidelines and regulation for all directors, executives, and all employees to be aware of and take action against and prevent corruption with all business activities strictly
- 1.3 To create confidence in customers, partners including business partners and other stakeholders.

2. Definitions

“**Corruption**” means bribery of any forms by ways of offering, promise to provide, provide, agree to provide, including request or accept of money, assets, services or other benefits that are inappropriate for government officer, government sector, private sector or any relevant persons in charge either directly or indirectly in order to do or refrain from duty of which deliver or preserve inappropriate business affair or other business benefit, including for benefit of himself, family, friends, unless otherwise provide by laws, rules and regulations, announcements, local culture or business practice.

3. Scope of Implementation

- 3.1 The Anti-Corruption policy applies to all employees of the Company, in which covers all directors, executives, and employees.
- 3.2 The Company expects that customers, partners including business partners and other stakeholders who have business relationship with the Company shall comply with the Anti-Corruption policy.

4. Duties and Responsibilities

- 4.1 Board of Directors of the Company has duties and is responsible for the imposition of policies and to supervise the establishment of efficient anti-corruption systems. In addition, the Board has to ensure the management awareness and attention to the anti-corruption scheme, and embed the organizational anti-corruption culture.
- 4.2 Audit Committee has duties and is responsible for reviewing financial and accounting reports, internal control system, internal audit system, and risk management, in order to ensure that the anti-corruption process is adequate, appropriate and effective in accordance with international standards.
- 4.3 Risk Management Committee has duties and is responsible for assessing the corruption risk relevant to business activities, and for supervising the establishment of prevention measure or mitigation measures including the assessment.
- 4.4 Chairman of the Board of Directors, director, and managements, have duties and are responsible for establishing the encouragements and supports the anti-corruption policy, including the communication to employees and related parties. In addition, they are responsible for reviewing the appropriation of relevant systems and measures to be aligned with the changes in business practices, rules and regulations, including applicable laws.
- 4.5 Internal Audit Department has duties and is responsible for reviewing the operation whether it is aligned with policy, rules and regulations, including law and regulatory requirements, in order to ensure the control systems are appropriate, adequate and efficient in management of the corruption risk including reporting to the Audit Committee.
- 4.6 All employees have duties and responsibilities to strictly comply with policies and practices of anti-corruption.

5. Guidelines for Anti-Corruption policy

- 5.1 Directors, executives, and employees of the Company (including other companies in which the Company has control over its business partners, and persons who may be considered as intermediaries or agents of the company.) are not allowed to proceed with, provide, or support any kinds of corruptions, either directly or indirectly.
- 5.2 Any action described in the Anti-Corruption policy shall be aligned with the guidelines set out in the Code of Conduct, as well as policies and practice for the Company's stakeholders, including rule, manual for related work, and other practices imposed in the future.
- 5.3 The Anti-Corruption policy covers all activities related to the Company's operations. The supervisors at all levels are assigned to communicate with employees for use in business activities that are in charge and to supervise the operation to be effective.
- 5.4 To establish anti-corruption risk assessment throughout the organization annually.
- 5.5 For clarity in proceeding with the risks of corruption, all directors, executives and employees at all levels must treat with caution for the following matters.

5.5.1 Gifts, gifts, entertainment and expenses

Methods to grant or receive gifts, and entertainment shall be in line with guidelines described in Code of Conduct of the Company.

5.5.2 Donations for charity or sponsorship

Granting or receiving donations shall be transparent and legal. The donations shall not for use as an excuse for bribery. This is in line with guidelines described in Code of Conduct of the Company.

5.5.3 Business relations and procurement

It is prohibited to provide or accept bribes to conduct any types of business with partners, counterparties, government agencies or business units operating business with the Company. It must be done in a transparent, honest and in compliance with relevant laws.

This will be effective from 13 November 2017 onwards.

Please be informed accordingly.

Announced on 13 November 2017

A handwritten signature in blue ink, appearing to read 'Mr. Chainarong Monthienvichienchai', is written over a faint, illegible printed name.

(Mr. Chainarong Monthienvichienchai)
Chairman of the Board of Directors