

# LATEST VERSION 1 AUGUST 2016

## ANTI-CORRUPTION POLICY

The Company emphasizes on the matter of anti-corruption and bribery for business benefits. Therefore, the Board of Directors resolved an approval for the Company to express the intention of signing to join the Private Sector Collective Action against Corruption (CAC). From such intention, the Company has added some stipulations into the Code of Conduct for directors, executives and employees, as well as into the guideline for Good Corporate Governance.

The Company prescribes that all of its personnel must acknowledge, comprehend and observe the anti-corruption policy and the good practices as follows:

### **1. Anti-Corruption Policy**

**“It is prohibited for the Company’s directors, executives and employees to accept any forms of corruption whether directly or indirectly, which are accepting things, gifts, entertainments, contribution, donation and other benefits for oneself from any persons doing business with the Company.”**

**In any case, it shall include employees, trading partners, customers and all groups of interested person both domestically and abroad. Furthermore, the observance of the Anti-corruption Policy shall be verified on a regular basis, at least once a year.**

**2. Definition of “Corruption”**: means a bribery in any forms, as being offered, promised, given, guaranteed, demanded, or received (in the form of money/property); it also refers to other benefits as inappropriate to public officers, governmental agencies, private organizations, trading partners, customers and all groups of interested person, whether directly or indirectly, for the said body to perform or omit to perform a duty for the purpose of maintaining the business or introducing the business to the Company in particular; or for the purpose of acquiring or retaining any other benefits as inappropriate to the business, except for the cases where the laws, regulations, announcements, rules, local custom or tradition allow for such act.

**3. Definition of “Giving matters or other benefits”**: means to give any privilege in the form of money, properties, things or other benefits as incentive, reward or as to build a good relationship.

**4. Definition of “Bribery”**: means to offer or receive things, gifts, rewards, or other benefits for oneself or from a person who is desirous of persuading into committing an act that is dishonest, illegal or against the Company’s Code of Conduct.

## **5. Good Practices**

1. The Company's directors, executives, and employees must observe the Anti-corruption Policy and the Code of Conduct by not being involved with the matter of corruption whether directly or indirectly.
2. The Company's employees and executives shall not act negligent of or inattentive to the following:
  - 2.1 When they experience an act within the scope of corruption in relation to the Company, they must notify it to their superior or the responsible person and cooperate with any fact investigation. In case of any suspicion or question, they shall consult with the superior or the person as determined to be responsible for the observance of the Company's Code of Conduct through any given channels;
  - 2.2 There shall not be any benefits both direct and concealed, whether for personal gain, family and friends in relation to the Company; for example, any act to sell products and services to the Company or in competition with the Company;
  - 2.3 They shall avoid accepting an entertainment from any persons related to the Company's business or other persons with possible benefits to be gained from the employees' performance of duty;
  - 2.4 They shall not demand or receive any unjust benefits whether directly or indirectly, or any other benefits for the business purpose, as well as not avail of bribery or corruption to conduct the business.
3. A reliable financial report must be carried out, including an efficient working system, with transparency and consideration for the potential risk of corruption in the performance of work, along with regular follow-up and monitoring.
4. The Company has arranged for reporting channels on corruption finding, as well as for fairness and protection to the employees who refuse or inform on the matter of corruption related to the Company, by using the protection measure to complainers or collaborators with the corruption report as specified by the Company in the whistle-blowing policy and suggestions.
5. Those who commit an act of corruption against the Company's Code of Conduct, shall be considered for a disciplinary punishment as set out by the Company, including a lawful penalty in case of an illegal act.
6. The Company gives priority to the propagation and promotion of knowledge and understanding to be used with other persons who must perform their duties in relation to the Company and the Company's interested persons, in order to build a good conscience.

## **6. Operational Regulations**

1. Any operation under the Anti-corruption Policy shall be carried out in accordance with the guideline as prescribed in the manual for corporate governance and code of conduct, policy and guideline for all groups of interested persons, related regulations and working manual, as well as any other guidelines as to be further set out by the Company.
2. This Anti-corruption Policy shall cover all activities related to the Company's business operation.
3. A companywide assessment for the risk of corruption is required to be conducted annually.

4. For the clarity in the undertaking on the risk of corruption, the Company's directors, executives and employees at all levels shall perform their duties with attention paid to the following matters:

4.1 Receiving/diving things or other benefits: the guideline is specified as follows:

**4.1.1 Receiving things or other benefits:**

- 1) It is prohibited for the Company's executives and employees to receive, demand and collect any gifts, entertainments, services, financial supports, money, rewards from the trading partners, creditors or interested persons doing business with the Company;
- 2) Requesting for supports in the form of money or things can be done on an organization-to-organization basis, with the approval signature obtained from an authorized director only;
- 3) Except for an occasion or a festival which is traditional and customary, receiving things or other benefits shall be allowed in condition that such things or other benefits **shall be of value not more than Baht 3,000** and/or it is necessary to maintain the good relationship between persons or organizations;
- 4) It is stipulated that a high-level executive (Manager level or Manager level up) shall be the organization's representative in receiving things or other benefits and send them to Chief Executive Officer through Personnel and Administrative Division within 5 working days from the date receiving such things or other benefits;
- 5) In the case of a keepsake on a traditional occasion, the Company shall permit the employees to receive it as with value **not more than Baht 500**, such as a calendar, keychain, note book, etc. as it is marked with the emblem or symbol of such organization; in this respect, a high-level executive (Manager level or Manager level up) shall be assigned to be the representative in the acceptance of such items and have the authority to consider distributing them to the employees. However, they have to report to Chief Executive Officer through Personnel and Administrative Division in writing;
- 6) In order to prevent a conflict of interest, the Company shall not at all allow its employees or its non-assigned persons to be the representative in receiving things or other benefits.

**4.1.2 Giving things or other benefits:**

- 1) To give things, it is specified to be done on a traditional and customary occasion whereas such things or other benefits **shall be procured and priced by the Company not more than Baht 3,000**;
- 2) To avoid leading to bribery, a survey and monitoring shall be conducted by the Company prior to an undertaking in order to prevent corruption. It is stipulated that a high-level executive shall be the organization's representative in receiving things or other benefits.

- 4.2 Donation for charity or subsidy: giving/receiving donation or collection shall be transparent and legal, by ensuring that such donation or subsidy is not to be used as an excuse for bribery.
- 4.3 Politics: the Company conducts its business with political neutrality and it shall not participate in and concentrate on any political party or any person with political power, and shall not use its funds or resources to support, whether directly or indirectly, any political party or any politician.
- 4.4 Business relationship and procurement: it is prohibited to give or receive bribe in conducting any kind of business with trading partners, contract parties, governmental agencies or agencies doing business with the Company. Any operation must be conducted with transparency and in accordance with the provisions of the related laws.
- 4.5 To build a good norm in the business operation, the Company has specified a policy of not receiving gifts during the New Year Festival and other occasions, as to be applied to the Company’s executives and employees.

5. Procedure in compliance with the Anti-corruption Policy

Description	Procedure
<ul style="list-style-type: none"> <li>1. The BOD expresses the commitment against corruption.</li> <li>2. The CEO shows the intention for the anti-corruption accreditation.</li> <li>3. The BOD appoints the audit committee to review self-assessment in terms of the anti-corruption measures.</li> <li>4. The Audit Committee reviews self-assessment for BOD consideration.</li> <li>5. All units take responsibility against corruption by observing the assessment form.</li> <li>6. The investigation and assessment are conducted annually.</li> </ul>	<pre> graph TD     Start([Start]) --&gt; Step1[The BOD expresses the commitment against corruption.]     Step1 --&gt; Step2[The CEO shows the intention for the anti-corruption accreditation.]     Step2 --&gt; Step3[The BOD appoints the audit committee to review self-assessment in terms of the anti-corruption measures.]     Step3 --&gt; Step4[The Audit Committee reviews self-assessment for BOD consideration.]     Step4 --&gt; Step5[All units take responsibility against corruption by observing the assessment form.]     Step5 --&gt; Step6[The investigation and assessment are conducted annually.]     Step6 --&gt; Stop([Stop])           </pre>