

Summary of Anti-Corruption Measures

Message from the Chairman

The Company is aware of conducting business with integrity, corporate social responsibility and fair treatment of stakeholders. The Company has participated in the Private Sector Collective Action Coalition against Corruption Project in order to present the intention to create and maintain an organization culture that corruption is unacceptable. The Anti-Corruption measure is established to be business guidelines for directors, executives, employees and business partners to run the business with transparency and sustainable growth.

Anti-Corruption Policy

1. Directors, executives, employees and third party in relationship with the Company must perform their duties with honesty, not seek benefits for themselves and strictly comply with laws and anti-corruption measures.
2. Any form of corruption whether direct or indirect is prohibited.
3. Dealing with state officials must be transparent and honest, not solicit, give or accept any bribe.
4. Directors, executives and employees shall not ignore any act of corruption and inform the Company according to the whistleblowing policy.
5. Employees must do their job in accordance with work manual to reduce consideration that may cause seeking their own benefit.
6. Anti-Corruption Measures covers all aspects of human resource management including recruitment, performance appraisal, compensation and training. The Company establishes the staff rotation policy to reduce the motivation for corruption.
7. The Company assess corruption risks in working process.
8. The Company communicates the Anti-Corruption Measures to customers, business partners and stakeholder and encourages them to follow the measures.

Guidelines for high risk activities

1. Political contributions
 - The Company has no policy to provide political assistance or engage in actions affiliated with political parties or groups.
 - The Company may support political activities of which the purpose is to promote democracy without business benefit.
 - Employees may personally join political activities without depriving work hours and performance without expression of views or use of other means to mislead others that the Company is behind any political party or political group or supports it.
 - Payment requisition for political contributions shall be approved by authorized persons according to the Company's regulations.
2. Charity contributions
 - The Company shall donate to charitable organizations, hospitals, educational institutes, temples and funds which are non-profit organizations.
 - Charity contributions shall be made without hidden purposes to bolster advantages or induce business favors.

- Donations or contribution must be put in writing as a memorandum for approval, stating objectives, complete with supporting documents such as letters soliciting donation, for the Company's authorities to approve before proceeding further.
3. Sponsorships
- Sponsorships can take various forms such as support for cultural events, the arts, and education.
 - Sponsorships are made for business objectives and usually for brand or reputation management purposes without expectation of any business advantage in return.
 - Sponsorship must be put in writing as a memorandum for approval, stating objectives, complete with supporting documents for the Company's authorities to approve before proceeding further.
4. Acceptance and giving of gifts, reception or other benefits
- Acceptance and giving of gifts, reception or other benefits must be denied except it is appropriate for the situation such as small gifts on the occasions.
 - Gifts, reception or other benefits worth less than 5,000 Baht or promotional products and corporate gifts with corporate's logo are acceptable.
 - In case of receiving gifts worth exceeding 5,000 Baht, receivers shall report their supervisor and send such gifts to HR for further proceeding such as donation to a charity or distribution to employees as reward or prize.
 - Acceptance and giving of gifts, reception or other benefits shall not lead to conflicts of interest and be conformed to the Company's regulations and Anti-Corruption Measures.

Risk Management

The Company institutes risk assessment concerning anti-corruption and develops Risk Management Policy in line with the identified risks and the internal control system. Annual revision is to be made. The risk appetite is set as zero Baht.

Internal Control and Audit

The Company institutes an internal control system suitable to the Company's business operation covering work, financial and approval process. Internal Auditor assesses the efficiency and effectiveness of the internal control on yearly basis and report the result to the Audit Committee. The emergency case shall be reported directly to the President.

Employee Protection

The Company ensures that no employee will suffer demotion or other adverse consequences, or incur any kind of penalty, for declining to involve corruption, even if this may cause the Company to lose existing business or fail to secure a new business opportunity. If employees believe they suffered intimidation, threats or harassment as a result of complying with this Policy, they should inform their supervisor or the Head of Human Resources without delay. If the matter is not remedied, it should be raised formally through the channels established in the Whistleblowing Policy.

Raising Concerns

If employees have suspicions or evidence of anyone engaging in corruption, they must immediately report the case to their supervisor or via the channels provided in the Company's Whistleblowing Policy. All such reports will be investigated with fairness reported to the Audit Committee.

Training and Communication

Employees will receive training on Anti-Corruption Measures to ensure they are aware of and understand the Company's policy on anti-corruption. The company communicates and encourages representatives, intermediaries, suppliers, service providers and contractors to adhere to the same standards of social responsibility and anti-corruption as the Company does.

Policy Violations

Whoever violates this Policy, including direct supervisors who ignore misconduct or are aware of misconduct but fail to deal with it, shall be subject to disciplinary action up to and including termination of employment. Ignorance of this Policy and/or the relevant laws is not an excuse for failure to comply. Any representative, intermediary, supplier, service provider or contractor who violates the terms of this Policy will face contract termination.

Information Disclosure

The Company assigns the President or an executive assigned by the President to disclose information about the act of corruption to the public.

Measures Revision

The Anti-Corruption Measures is reviewed annually or when there is significant change of business, law or regulation.

Related Laws, Regulations and Policies

Thai laws concerning fraud and corruption, Risk Management Policy, Corporate Governance Policy Whistleblowing Policy, Code of Ethics, Regulations on Authorities, Regulation on Receiving and Payment and Other Company's policy, regulations, guidelines and handbooks on anti-corruption and Employee Handbook.