

Summary of Anti-Corruption Policy

Objective

The Company is committed to conducting business with transparency and good corporate governance. The Anti-Corruption Policy has established as an operational guideline for all directors, executives and staff for sustainable growth.

The Company has joined [Private Sector Collective Action Coalition against Corruption](#) that will work in cooperation with Government, civil society, media, and international organizations to foster cleaner business practices.

Principle

It is prohibited that all directors, executives and staffs at all level concerned with the corruption. All activities of the Company's business must be operated without corruption.

Definition activities with high risk relating to corruption

1. Political Contribution

A political contribution is a contribution, financial or in-kind, to support a political cause. Financial contributions can include loans. In-kind contributions can include gifts of property or services, advertising or promotional activities endorsing a political party, the purchase of tickets to fundraising events and contributions to research organizations with close associations with a political party. The release of employees without pay from the employer to undertake political campaigning or to stand for office.

2. Charitable Contribution

Charitable contributions can present risk as they involve payments made without tangible return and may be used as a subterfuge or route for bribery. Donations can be steered for corrupt purposes to "front" charitable, sporting or philanthropic organizations or used to create undue influence such as donating to a favoured cause of a decision maker or customer for a potential contract.

3. Sponsorships

Sponsorships are made for business objectives and usually for brand or reputation management purposes. They can present risk as they involve payments made for services or benefits that are often hard to measure and track. Sponsorships can be subject to kickbacks; funds can be steered for corrupt purposes to "front charitable, sporting or philanthropic organizations or used to create undue influence such as sponsoring a favoured cause of a decision maker or a customer.

4. Gifts, Hospitality and Expenses

Gifts, hospitality and expenses present risks related to bribery. They may be used by corrupt third parties to manoeuvre the company's employees to a position of obligation and prepare the way for a corrupt act or by an employee corruptly to build favours with prospective clients. Inappropriate gifts, hospitality or expenses given to a potential client may cause offence or infringe the clients own rules and could lead to exclusion from bidding from business.

Role and Responsibility

1. The Board of Directors has a duty and responsibility to set policy, oversee a system that supports the anti-corruption and to ensure that executive management recognizes the importance of anti-corrupt.
2. The Audit Committee has a duty and responsibility to review the system of financial accounting, internal controls, internal audit and risk management according to international standards and to be efficient and effective.
3. President and Executive have a duty and responsibility to establish the system and support the implementation of the policy against corrupt and communicate to employees and all concerned agencies. They have to review the appropriateness of systems in order to comply with concerned law and regulation.
4. Vice President of Office of Internal Audit has a duty and responsibility to monitor and review the internal control system to ensure that the controls are appropriate and adequate. Moreover he has to audit the business operation to ensure that they comply with law and regulations of the regulators and the Company.

Guidelines

1. Directors, management and staff at all level must comply with the Anti-Corruption Policy. They must not get involved in corrupt whether directly or indirectly.
2. Directors, management and staff should not negligent when discover the corruption. They must notify the supervisor or the person in charge as soon as possible.
3. The Company is committed to creating and maintaining the anti-corruption corporate culture.
4. The Company set the clear and transparent guideline of authority to reduce the discretion of the staff, which may take advantage from duty.
5. In order to reduce the incentives and opportunities for corrupt, the Company set the policy on position rotation and consideration of those who are responsible for the financial or conducive to the interests carefully.

6. The Company has reviewed the guidelines and requirements for the implementation of the policy against corrupt regularly in order to comply with law and regulations.

Provision

1. The Anti-Corruption Policy covers all personnel administration process.
2. Code of Conducts, Corporate Governance Practices, Stakeholders Policy, the Company regulations and working manual are the guidelines for practicing to comply with the Anti-Corruption Policy.
3. It is prohibited to give or accept bribes in the business operation.
4. The implementation of the activities that have a high risk of being corrupt, directors, management and staff must be careful and compliance with the requirements relating to the following.

4.1 Political Contribution

The Company's business policy of neutrality. The democracy support would not be contrary to law and is not intended for business benefits. Staff has the right to personal freedom to participate in political activities.

4.2 Charitable Contribution

The Company has a policy of donating to charity to generate public interest and social responsibility. The donations to charity are not affiliated with reciprocal benefits to any person or entity and must be approved by the authorized person.

4.3 Sponsorships

The financial support or other benefits is a way of promoting the company's business. The Company supports the project that contributes to social benefit and must be approved by the authorized person.

4.4 Gifts, Hospitality and Expenses

All directors, management and employees must not demanding or accepting gifts and other benefits from customers, partners, or who is involved with the business of the company that might have an impact on the decision to act in a biased or embarrassment or synergy.

Gifts, hospitality and entertainment can be given or received if all the conditions are as follows:

- Not affect the decision-making in business.
- Based on cultural traditions or practices in social etiquette.
- Accurate and appropriate to the circumstances.
- Not contrary to law.
- Experience with transparency and can reveal

- Not in the form of cash or equivalent to cash
- Must not exceed 3,000 baht. The gift that exceeds 5,000 Baht must be notified to superiors and be delivered to the Organization Development Department to be used as a reward to employees on special occasions or be donated to charity as appropriate.
- The company may produce gifts with company logo to give to customers and partners.

The protection of staff

The Company provides fairness and protection for directors, executives and employees who refuse to corrupt. The staff assured that they will not be punished although the rejection of corrupt makes the Company lose business.

The policy violation

Directors, executives and employees who violate this policy compliance, including direct supervisors who ignore the actions of employees will be imposed to dismissal from work and prosecuted by law, if the practice is illegal. Employees shall not use the excuse that they do not recognize the policy.

The company will review the business and may terminate the contract with the agent and broker partners who violate this policy.

Training and Communication

The Company shall train employees about the Anti-Corruption Policy to cultivate a culture of honesty, recognize the importance of the policy and understand the guidelines set out in this policy.

The Company also communicates the policy to the third parties such as customers, suppliers and stakeholders by publishing on the website of the company and determining in the commercial contract.