



# Anti-Corruption Policy and Measures

The Navakij Insurance Public Company Limited

No, 3	Written by Anti-Corruption Working Team	Approver The Board of Directors	Approval date 9 November 2021
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## 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 Policy and Measure are established to be business guidelines for directors, executives, employees and business partners to run the business with transparency and sustainable growth.

Mr.Suchin Wanglee

The Chairman of the Company

## Definition

“Corruption” means the action to seek unlawful benefits for oneself and others, such as embezzlement, fraud, reporting fraud, disinformation, disclosure or exploitation of Company's confidential information, etc., including receiving bribes such as offering, promising, giving, pledging, demanding or receiving money, property or any other benefit to government officials, government agency, private sector or those who are in charge whether directly or indirectly to act or refrain from performing duties which is to acquire or maintain business or any other benefits that are inappropriate except in the case of laws, regulations, announcements, regulations, local customs or trade customs.

“Political Assistance” means assistance to support the activities of a political party whether it is financial or other such as giving things or services, advertising or supporting a political party, purchasing tickets to an event organized to raise funds or make a donation to an organization who is close to political party including encouraging employees to participate in political activities on behalf of the Company, not including employees participating in activities based on personal liberties.

“Charitable Donations” means donation in both money or stuffs, other benefits to person or juristic person such as organization, charity, foundation, funds for public health.

“Sponsorships” means giving money or stuff, benefits for business objectives, brand or reputation of the Company.

“Gift” means anything of value other than money given to each other at different times for hospitality, to give as a reward, to give by affection, or given to each other on various occasions, usually according to customs, traditions, culture, or social etiquette such as New Year's gifts, birthday gift, a gift for a new position, retirement gifts, etc.

“Hospitality” means the Company's operating expenses to build good relationships or express social etiquette. This may include accommodation costs, fare, company visit or food and beverage, etc.

“Any other benefits” include an invitation to attend the event, an air ticket, staying in a hotel, discount, privilege, hiring friend or relative, etc.

“Bribe” means any persuasion, offer or promise to give or give in order to obtain a commercial, contractual, regulatory, statutory, legal or personal advantage.

“Facilities” means a little expense paid to an informal government official to ensure that government officials will proceed with quicker action. This willingness process does not require the discretion of government officials as well as a juristic person should have the right under the law such as requesting a license, a certificate and obtaining public administration, etc.

“The government official” means the person who is working under the authority of the government such as politician, judge, constitutional court, a person working in an independent organization and the National Anti-Corruption Commission (NACC).

“The state official” means a government official or a local official holding position or regular salary working in the government agency or in the state enterprise, a local management, a deputy local administrator, a local administrative assistant and members of the local council of local government organization. The government official under the law on local administrative or other as law regulation including a committee, a sub-committee, an employee of a government agency, government agency or a state enterprise and a person or a group of people who are prescribed by law to have administrative power established in the government system, a state enterprise or other. However, those who are holding a political position, Constitutional Court, a person holding a position in an independent organization and the National Anti-Corruption Commission (NACC) are not included.

### Anti-Corruption Policy

1. The Company has an intention to resist and not accept all forms of corruption. The Board of Directors formulated an anti-corruption policy which is applied to directors, executives and employees of the Company including the group of companies and business representatives as follows: 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. Directors, executives and staff of all levels are prohibited to be involved in corruption whether directly or indirectly
3. Dealing with state officials and private sectors 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.

## Duties and responsibilities

1. The Board of Directors
  - Set a policy and Anti-Corruption Measures, regularly reviewing to get along with the Company's strategy and risk
  - Ensure that the Company has an efficiently system supporting the Anti-Corruption, an administrative section need to aware and pay attention to the Anti-Corruption and cultivate to be one of the Company's culture
2. Audit Committee
  - Review the financial report, account system, internal control system and risk management system to comply with the law related to the Company's business and international standard. Make sure that all of them are effective, modern, appropriate and cautious
  - Be acknowledged about corruption reports in both general report and emergency report
3. Remuneration, Nomination and Governance Committee
  - Consider reviewing and give an opinion to Anti-Corruption policy if it is adequate, appropriate and comply with business change, regulations and law before proposing to the Board of Directors for approval
  - Provide advice to the Board of Directors for implementing the Anti-Corruption Policy and Measures
4. Risk Management Committee
  - Consider risk management policy, risk appetite and risk tolerance
  - Review the risk management report for evaluating and following up the important risk
  - Ensure that the Company has an appropriate risk management measures on corruption
5. Executive Board
  - Consider the Anti-Corruption Policy and Measures to be appropriate with risk and strategy of the Company and comply with international standard and related law before proposing to the Remuneration, Nomination and Governance Committee
  - Control and supervise the overview of anti-corruption
  - Be acknowledged the implementation of the Anti-Corruption Policy and Measures
6. President
  - Promote and support implementation of the Anti-Corruption Policy and Measures
  - Communicate the Anti-Corruption Policy and Measures to the all staffs
  - Appoint Anti-Corruption Working Team and manage the appropriate time for them to operate the assigned work
  - Decide in any process when the corruption situation is occurred

- Be acknowledged the implementation of the Anti-Corruption Policy and Measures and report to the Executive Board

7. Vice Presidents

- Support and promote values of anti-corruption inside and outside the Company
- Supervise responsible departments to comply with the Anti-Corruption Policy and Measures
- Assess the corruption risk and prepare a risk management plan to reduce the risk

8. Anti-Corruption Working Team

- Consider and review the Anti-Corruption Policy and Measures before proposing to the Executive Board
- Coordinate with related departments to communicate the Anti-Corruption Policy and Measures both inside and outside the Company.
- Report implementation of the policy to the President
- Coordinate and provide advice about implementation of the policy

9. Office of Internal Audit

- Audit and review an internal control system and perform along the policy, rules, execution authority, regulations, laws and regulatory requirement to ensure that the internal control system is appropriate and adequate with corruption risk.
- Record the investigation result in a complaint system of the Company in case of the Corruption is occurred.
- Report the internal investigation to the Audit Committee

10. Office of Risk Management

- Prepare risk assessment criteria and acceptable risk level to propose to the Risk Management Committee.
- Provide advice and gather risk information of various departments and report to the Risk Management Committee
- Coordinate with various departments to assess, identify and formulate an annual corruption risk management plan to prevent and reduce the corruption risk.

11. Office of Compliance

- Annual review Audit-Corruption measures or when there is a change in rules, regulations, legal requirements and the Company's business and propose to the Anti-Corruption Working Team for consideration
- Prepare a report on the implementation of the Anti-Corruption Policy and Measures and propose to the President.

## 12. Organization Development

- Organize training on the implementation of the policy for employees to understand and perform correctly
- Compile gifts that are delivered and allocate them to reward employees on various occasions or donate to charity.
- Compile and record gift receipt report and gift management for auditing
- Summarize and send gift receipt reports to the Office of Internal Audit to report to the Audit Committee at least once a year.

## 13. Office of Corporate Identity and Communications

- Prepare a anti-corruption communication plan
- Prepare a letter, messages and public relations media to communicate and enhance understanding for both internal and external parties
- Consider communication channels that are suitable for the target group
- Prepare two-way communication

## 14. Employees

- Comply with the policy and measures
- Communicate to outsiders about the Company's policy and measures.
- Whistleblow to the designated channel when found or suspected of corruption incidents
- Record data in the Incidence Report system when damage occurred from corruption.

## Guidelines for high risk activities

The Company imposes that high-risk activities, which conflicts of interest or corruption might be happened, must not be at the time of negotiating or offering on projects, not acting with decision makers in doing business with the Company and for the benefit of the public. Such activities must comply with the requirements and guidelines as following:

### 1. Political contributions

Political contributions can cause conflicts of interest and corruption, if it benefits to receive the contract or business. The Company has a policy to adhere in political neutrality. Therefore, guidelines are established as follows:

- 1.1 The Company has no policy to provide any fund or assistance either directly or indirectly with the objective of benefiting business to political parties, politicians or people who are related to political parties.



1.2 The Company may provide political assistance in accordance with the following criteria:

- To promote democracy only
- Not infringe relevant laws
- Do not expect business benefits in return
- Support government agency which has a duty to promote the democracy only

1.3 Political assistance approval must perform as follows:

- The requester proposes the objectives, project details and the benefits that people will receive from the project and attach documents for approval, such as a letter from a related government agency.
- Propose to the President for approval
- Follow the receiving and paying money regulation
- The requester must follow up if the objective of the project has been carried out, report the result to the Presidents and keep the documents for auditing

1.4 Employees have the right to participate in political activities under the Provisions of the Constitution and must perform as follows:

- 4 Do not participate in activities on behalf of the Company
- 5 Do not use the Company's assets for political activities
- 6 Do not make a misunderstanding that the Company supports employees to participate in political activities.

## 2. Charity contributions

Donating money, stuffs or any other benefits may cause a risk or a chance of corruption because it relates spending money with no tangible return or it may have a hidden purpose to generate an advantage such as a donation to a customer or decision-maker in order to obtain or maintain a business contract. Therefore, the Company has established guidelines as follows:

2.1 The Company has a policy to donate for charitable purposes according to the following criteria:

- The Company shall donate to charitable organizations, hospitals, educational institutes, temples and funds which are non-profit organizations.
- The purpose is to create public benefits or as a social responsibility and is truly for the benefit of society.
- Charity contributions shall be made without hidden purposes to bolster advantages or induce business favors.

- Not involved in the reciprocal benefits to any person or agency except for the honorary announcement, branding, announcing the names at the venue of the event, public or relations media in return for charitable donations
- Do not expect business returns
- Do not make donations to various agencies during the negotiation period.

2.2 Requesting approval for charitable donations must perform by the following criteria:

- The applicant proposes the objectives and details of the project.
- Must be approved by the authorized person in accordance with the regulations on the authority to operate.
- Ask for approval to pay according to the receiving and paying money regulations.
- The applicants must follow up if the objective of the project has been carried out, report the result to the Presidents and keep the documents for auditing
- Disclose charitable contributions in the Company's annual report.

### 3. Sponsorships

Sponsorships can be a chance of corruption risk because it is hard to specify or follow up if the objectives are reached correctly. It can be related to bribery and inappropriate if returned stuffs are of high value such as the ticket for entering an important sport match. The Company defined the guidelines as follows:

- 3.1 Sponsorships such as supporting art, culture, education and sport events are allowed for promoting the Company' business.
- 3.2 Sponsorships' objectives are contributing to public benefits or publicizing the Company' business
- 3.3 Sponsorship must not involve in reciprocal benefits to any person or agency, except for the announcement of honors according to common practice, such as affixing a logo or announcing the Company's name at the venue of the event or in public relations media.
- 3.4 Requesting approval for sponsorship must perform as follows:
  - The applicant proposes the objectives and details of the project.
  - Must be approved by the authorized person in accordance with the regulations on the authority to operate.
  - Ask for approval to pay according to the receiving and paying money regulations.
  - The applicants must be followed up by the purpose of the charitable donation and report the result to the authorized person for acknowledgment and keep the documents for auditing.

#### 4. Acceptance and giving of gifts or other benefits

Acceptance and giving of gifts or other benefits can be a chance of corruption that might lead to bribery. If the action opposes the policy of the customers or partners, the Company might lose a business chance so that “No Gift Policy” is defined. In case of necessity, the Company defined the guidelines as follows:

##### 4.1 Criteria to consider gifts and other benefits that may receive are as follows:

- To build goodwill, develop business relationship and strengthen collaborative relationships
- In accordance with customs, traditions, cultures or manners. For example, giving a gift in New Year festival and congratulations on different occasions, etc.
- A general gift such as a gift with the company’s logo
- Giving or receiving a gift in right time and place, such as not giving or accepting a gift during bid
- Not affected on business decision
- The receiver must not be an insured or license issuer
- Not infringe relevant laws
- Cash or cash equivalent such as a gift card is prohibited.
- Avoid giving a gift to a supervisor or receive a gift from a subordinate except a gift in accordance with customs, traditions, cultures or manners

##### 4.2 Guidelines for accepting gifts and other benefits:

- Do not demand gifts or other benefits from outsiders.
- Deny to receive gifts and other benefits which is conflict to Anti-Corruption measures and affected the decision on duties for personal benefits.
- Acceptable gifts and other benefits must not exceed 5,000 Baht. In case that the gift cannot be refused, the recipient shall consider to hand over the gift worth more than 5,000 baht to the Organization Development Department.
- The regulations of receiving gifts are as follows:

The gift receiver

- Fill in the gift report
- Inform the supervisor and let him/her sign in the gift report
- Deliver the gift with the gift report to Organization Development Department
- Record detail of the gift in Incidence Report System

Organization Development

- Distribute the gifts to the employees in various occasions or make charitable donation
- Record the gift management in the gift report and keep the documents for auditing
- Prepare and send the gift report to the Office of Internal Audit to report to the Audit Committee at least once a year.

4.3 Guidelines for giving a gift and other benefits:

- The gift shall have the Company's logo and not exceed 3,000 Baht
- Giving the gifts might conflict to No Gift Policy of the receiver. The company might lose a business opportunity in case of misunderstanding.
- Approval for paying shall be in accordance with receiving and paying regulations.

## 5. Hospitality

Guidelines for hospitality are as follows:

- 5.1 Do not organize hospitality in an inappropriate place or in violation of the Company's regulations and policy. It shall not be bribery or affect business decision or have conflicts of interest.
- 5.2 Be in accordance with customs, traditions, culture or social manners.
- 5.3 Do not require or suggest a reception.
- 5.4 Reception for customers, partners or those related to the Company must be approved by the authorized person in accordance with the authority to operate or other announcements related reception price.

## 6. Journey with government officials or a representative of the government agency

The regulations of journey with government officials or a representative of the government agency are as follows:

- 6.1 Comply with the regulations with the government agency
- 6.2 Before travelling, notify the manager and supervisor of the government official of travelling details such as objectives, duration, transportation, estimated travel cost
- 6.3 Hospitality or reception shall comply with the regulations of acceptance and giving of gifts or other benefits.
- 6.4 Paying approval shall comply with the receiving and paying regulations.

## 7. Government Official or Government employee hire

Hiring government officials or government employees might gain business benefit or cause conflict of interest because of inside information. Therefore, the Company established guidelines as follows:

7.1 Do not hire or appoint a government official who is still in the position except those who are permitted to work in private section.

7.2 Person to be hired must be retired from a government official or government employee position at least 2 years before employment.

7.3 The Company must examine a profile of a retired government official or employee if there are conflicts of interest before employment or appointment to be a director, an adviser and an executive.

7.4 Do not assign a retired government official or employee to perform duties that may abuse powers or relate to conflict of interest issue, such as disclosing secrets of former government agency, negotiating to gain unfair advantage, contacting the former agency.

7.5 Disclose name list and profile of all retired government officials or employees who are appointed to be a director, an adviser or an executive with reasons.

**Note:** The Non-Life Insurance Act, Section 34 states that a director, manager, consultant or an authorized person must not be a political official. A person holding a political position government official and an employee of the Office of Insurance Commission are prohibited as well. However, a state enterprise and the Company that is approved by the Board of Directors to assist the operation or appointed under Section 53 of the Insurance Act are permitted.

## 8. Working in Government Policy

In the case that the Company's directors, executives, employees or consultants hold a position related to policy in government agency, that may be beneficial to business decisions. On the other hand it may be a corruption risk. Therefore, the Company has established guidelines as follows:

1.1 Do not work in agency that use abuse authority or related to conflicts of interest issue such as disclosing secrets of the agency or negotiation for gaining unfair advantage, etc.

1.2 Disclose name list and profile of the person who works in government policy and describe the reason to work.

1.3 If there are any conflict of interest issues, that person must resign from the government official position immediately.

Approval consideration shall be operated in accordance with the regulations on the authority and be careful about conflicts of interest. Do not approve selves and selves related transactions.

#### Examples of actions considered corruption

- Giving a gift or organizing a hospitality to someone who authorize to insure with the Company
- Acceptance gift or reception from vendor or service provider during the time of the selection of provider
- Requesting money from outsource service provider such as a garage, an auto repair service Center, a surveyor in exchange for work.
- Donations to an organization or agency for business benefits in return
- Giving money or stuffs to support an activity for business benefits in return
- Giving money or stuffs to a government official for convenient or shorten procedures

If there are any questions about policies, regulations and requirements, advice is provided by presidents and Anti-Corruption Working Team

#### Corruption risk management

The Company defined risk management policy and annually reviewed. The policy identifies that all agencies must assess corruption risk by identifying key risks and formulate a risk management plan to reduce and prevent potential risks. The Company set risk appetite as Zero Baht due to Anti-Corruption measures, Whistleblowing and Complaint policy and Anti-Corruption measures guidelines for all employees.

#### 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.

### Whistleblowing and Complaint

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 by the investigation committee and reported to the Audit Committee.

### Training and Communication

Employees will receive training on Anti-Corruption Policy and 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.

Directors, executives and all employees, who violate the policy and measure, cannot claim that they are not aware of the relevant policy and measures or laws.

### 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.

### Policy and Measures Revision

The Anti-Corruption Policy and 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.

# Appendix A : Gift Receipt Report Form



## Gift Receipt Report Form

Date \_\_\_\_\_

Name \_\_\_\_\_ Division \_\_\_\_\_ Department \_\_\_\_\_

To report gift receipt from outsider as follows:

Receipt Date	Detail	Price	Giver's Name	Relationship with the Company

Reason \_\_\_\_\_

Occasion \_\_\_\_\_

Sign \_\_\_\_\_ Receiver Date \_\_\_\_\_ Supervisor

( \_\_\_\_\_ )

( \_\_\_\_\_ )

Date \_\_\_\_\_

Date \_\_\_\_\_

### For Organization Development Department

Organization Development Department has received the gift and managed to

☐ Give as a reward to employees of \_\_\_\_\_ Department, date \_\_\_\_\_

In \_\_\_\_\_ occasion

☐ Charitable donation on behalf of The Navakij Insurance Public Company Limited to \_\_\_\_\_ on \_\_\_\_\_

In \_\_\_\_\_ occasion

☐ Others (please specify) \_\_\_\_\_

Sign \_\_\_\_\_ Organization Development Department Date \_\_\_\_\_

( \_\_\_\_\_ )



## Appendix B : Government contact department

Department	Business Relationship	Duties
Claims Management	Prosecution Agency	- Follow up on the result of the case and negotiate damages with the party
	Regulatory Agency	- Clarify the facts in the case of complaints about claims
Assets Management	Regulatory Agency	<ul style="list-style-type: none"> <li>- Sending report</li> <li>- Permission</li> <li>- Consulting</li> <li>- Request for placing/returning of securities used as collateral</li> <li>- Inquiry</li> </ul>
Information System	Regulatory Agency	<ul style="list-style-type: none"> <li>- Sending information</li> <li>- Sending report</li> </ul>
	Information Support Agency	- Use of service through electronic system
Office of President	Regulatory Agency	<ul style="list-style-type: none"> <li>- Permission</li> <li>- Registration</li> </ul>
Office of Compliance	Regulatory Agency	<ul style="list-style-type: none"> <li>- Report</li> <li>- Consulting</li> </ul>
Organization Development	Regulatory Agency	<ul style="list-style-type: none"> <li>- Registration and update employee information</li> <li>- Branch registration</li> <li>- Remittance of contributions</li> <li>- Personal income tax remittance</li> <li>- Training approval</li> <li>- Agent license renewal</li> <li>- Requesting assistance to find resumes of applicants</li> <li>- Remittance of frozen money</li> <li>- Criminal background check</li> </ul>
Office of Risk Management	Regulatory Agency	- Report

## Appendix C : Assessment guide

Impact				
	Financial Loss from Scandal	Reputation	Customers / Shareholders	Law Enforcement
<b>5 Severe</b>	Fine 2 times of value/ benefits or > 30 Baht Million	The Company is put on a prohibited list. Negative image on Good Governance	Being sued by shareholders/customers for damages	The contract/business license are cancelled. Directors and the chief executive are imprisoned
<b>4 Significant</b>	1 million – 30 Baht million	The media reported the case continually and society started to pay attention.	The directors and executives must explain the facts.	Being inspected by government agency and point out the fault
<b>3 Moderate</b>	100 thousand – 1 Baht million	Social media publish news or information about corruption related to the Company.	Customers/shareholders ask questions to the Board of Directors.	The Company might be required to submit evidence and provide clarification if the audit agency accepts the matter.
<b>2 Minor</b>	10 thousand – 100 thousand	Rumors, which refer to inside people of the Company or the Company, are appeared	Started to have concerns and inquiries.	The Company might be warned or fined according to the fee value insignificant
<b>1 Negligible</b>	Less than 10 thousand Baht	Almost none	Almost none	Almost none

## Appendix C : Assessment guide (continued)

### Likelihood

	Possibility	Frequency
5 High	An event that is highly happen in every business operation.	>1 time / year
4 Likely	An event that is likely happen in most business operations.	1 time / 2 years
3 Possible	A possible event that can sometimes happen in business operations.	1 time / 3-5 years
2 Unlikely	An event that is unlikely happen in business operations.	1 time / 5 years
1 Highly Unlikely	An event that is highly unlikely happen in business operations.	1 time / 5-10 years

Impact	1	2	3	4	5
	Highly Unlikely	Unlikely	Possible	Likely	High
Probability					
5 Severe	High	High	Very High	Very High	Very High
4 Significant	Medium	High	High	Very High	Very High
3 Moderate	Low	Medium	High	High	Very High
2 Minor	Low	Low	Medium	High	Very High
1 Negligible	Low	Low	Medium	High	High

# Appendix D : Corruption Risk Assessment

Business Activities	Risk Type	Corruption Risk Description	Likelihood	Impact	Risk Score	Key Controls already in place	Residual Risk	Further actions to be taken to further minimize risk	Risk Owner

**Appendix E : Anti-Corruption Committee**

- |                    |                 |   |
|--------------------|-----------------|---|
| 1. Mr. Wanchai     | Angkanavisetkul | Organization Development Department             |
| 2. Ms. Sopa        | Sae-Heng        | Organization Development Department             |
| 3. Ms. Charuwan    | Chabchamrun     | Office of Compliance                            |
| 4. Mr. Sedthapong  | Imridtha        | Office of Compliance                            |
| 5. Ms. Apinya      | Kaewsard        | Office of Risk Management                       |
| 6. Ms. Sirinapa    | Thaewthap       | Office of Risk Management                       |
| 7. Ms. Praewpailin | Ningsanond      | Office of Corporate Identity and Communications |
| 8. Ms. Wichitra    | Adisakdacha     | Office of President                             |