

# Guidelines for Implementation of the Anti-Corruption Policy

## 1. Prevention Guidelines and Anti - Corruption

- 1) Directors, Executives, Employees at all levels comply with this policy will not be involved in Corruption, whether directly or indirectly, including prohibiting executives and employees at all levels from demanding, taking action or accepting corruption for the benefit of oneself, family, friends and acquaintances.
- 2) Do not neglect or neglect when found an action that is considered Corruption related to the company and must notify the supervisor or person responsible including having to cooperate in checking the facts.
- 3) If in doubt or want to consult the supervisor or persons responsible through the channel that have been specified.
- 4) Fairness and protection of employees who report Corruption or deny Corruption by implementation of measures to protect complainants (Whistleblower Policy).
- 5) Treating gifts entertainment, expenses, both giving and receiving in accordance with the requirements ethics or regulations of the company.
- 6) Procurement practices and business relations. It is forbidden to give or accept bribes in all business operations type of operation of the Company, including working with the government must be conducted with transparency and comply with relevant laws.
- 7) Create and maintain organizational culture against corruption and Corruption in both public and private sectors.

## 2. Political assistance

The Company has a policy of political neutrality by acting neutrally in politics and does not provide financial support or anything else, whether directly or indirectly, for the benefit of politics, political parties or politicians, including the Company does not do anything related to politics, such as participating in a campaign or advertising in the Company's area by the Company respects the privacy rights of employees and encourage employees to act according to laws and customs good practice.

### Guidelines

- 1) Exercising political rights in their own name and avoiding acts that others may perceive as acting in their name of the Company.
- 2) Should not be expressed in any way that make other people understand that the Company involved in contributing to supporting political action, political party, political coalition political authority or applicant political election.

- 3) Do not wear employee uniforms or have any symbols that can be understood by others as employees of the Company attending political meetings or participating in public gatherings, any place having a political nature.
- 4) Political expressions or opinions should be avoided in the workplace or during work that may be done cause conflicts in the work.
- 5) It is the Company's policy to avoid helping candidates for elections, political parties, including informing news and perspectives on politics which is a matter of public interest and has a significant impact to the Company.

### **3. Charitable donations and sponsorships**

The Company therefore exercises caution in charitable donations and sponsorships because it is an activity involves spending money without any tangible return that could create a risk of fraud.

#### **Guidelines**

- 1) Practices regarding charitable donations or sponsorships both giving or receiving must be transparent can be verified according to the law and good morals of the people.
- 2) Donations or sponsorships must operate for organizations that are legally registered and have a clear purpose for the public use of the donated or sponsored assets benefits or assistance to disaster victims. The Company will not donate or provide financial support to individuals or in the event that there is even any part related to reciprocal benefits or is implied in the way of Corruption or associated with a political party or contrary to the principles of good Corporate Governance, including policies, rules, regulations of the Company, including the laws related to the business of the company, prepare a memorandum requesting approval for supervisors approved by line of work In the record, specify the name of the donor or sponsor, the purpose and budget or items to donate or support Including the process of donating or sponsoring.
- 3) Register of records and documents related to donations or sponsorships evidence for verification.

### **4. Receiving or giving gifts , hospitality fees and other expenses**

- 1) The Company determines that giving, giving or accepting gifts and/or hospitality fees and/or other expenses to from any person must be of type and value.
- 2) Personnel at all levels and/or families are prohibited from accepting or promising to receive any benefits or valuables illegally in order to persuade them to perform or refrain from performing, including any action that fall into the aforementioned, prohibiting claim support or any other benefits from the contractor sub-contractors, vendors, joint ventures or people involved in the business of the Company in any case.

3) Refrain from accepting gifts, tokens or sponsorships from customers or business partners of the Company with a value of more than 500 baht if it is necessary to accept or received a gift or any other benefit, the recipient must return it to the giver immediately. If unable to return given to the Human Resources Department and shall be regarded as the rights and property of the Company.

4) In the case of gifts or tokens given to representatives of the company and it is valuable to remember important events of the company, such as the signing of a joint venture agreement honorary award receiving souvenirs from activities, social contributions are allowed for all levels of personnel to receive on behalf of the company by providing a report on the acquisition and delivering it to the Human Resources Department to keep in the right place.

## **5. Facilitation fee**

The Company has no policy to pay facilitation payments in exchange for facilitating the operation illegal business and causing Corruption.

### **Guidelines**

1) Directors, Executives and Employees at all levels are prohibited from giving, asking or agreeing to give facilitating payments or bribes in all forms, whether as assets or rights or any other benefits to government officials, foreign government officials or officials of international organizations in order to incentivize them to act or not to act or to delay them unlawful.

2) In dealing with the government must be transparent can check and must comply strictly related laws.

## **6. Hiring government employees**

The Company has established a government employee employment policy to supervise recruitment such as selection process, hiring approval Remuneration and control process to ensure that the Company does not employ government employees to be the Company's employees to live in a relationship or inside information for benefit causing Corruption Conflict of Interest. However, the employment of the Company's employees must not be in return for obtaining any benefits or contributing to the Company's benefits which destroys the image of credibility and honesty duty which has a risk of Fraud and Corruption.

### **Guidelines**

1) Recruitment, Selection and Remuneration Approval for hiring government employees to hold the position Department manager level job down must be considered the reason and necessity from Chief Executive Officer before hiring that government employee.

2) Recruitment, Selection and Remuneration Approval for hiring government employees to hold the position of Director and the level of Assistant Chief Executive Officer or higher must be considered and justified careful emphasis from the Nomination and Remuneration Committee and proposed for approval to the Board of Directors.

3) The Company will not employ government employees.

4) Employee employment information must be disclosed in the Company's annual report.

5) The Human Resources Department is responsible for supervising the employment of government employees. If a government employee is employed Local politicians employed must be approved according to clause 1) prior to the operation and Disclose information in accordance with the approval and reporting procedures above.

## **7. Human Resource Management**

The company has human resource management to support the anti-corruption policy to be effective and This is to prevent all forms of Corruption.

### **Guidelines**

1) Anti-corruption policy applied to practice on personnel management process. Since the recruitment or selection of personnel Promotion, training, performance appraisal and remuneration must be appropriate and in accordance with relevant regulations.

2) Raise awareness to understand and see the importance of Anti-corruption by the Company provides orientation, training and knowledge testing on Anti - Corruption policy.

3) The Company clarifies the penalties for violating the anti-corruption policy to Directors Executives and employees know.

4) The Company will not demote, punish or give negative results against employees who refuse to commit Corruption, even if the refusal will cause the company to lose business opportunities and has a communication process for employees to be informed thorough and clear.