

## **11. Anti-Corruption Policy**

The Company has the ideology to conduct business with integrity by adhering to the importance of social responsibility and all groups of stakeholders under the management framework in accordance with the principles of good corporate governance and operate business with transparency with an internal control and audit system that reduces the chance of fraud in the organization to show the intention and determination against corruption in all forms in order for the Company to determine the appropriate roles, duties and responsibilities in preventing corruption that may occur in the Company's business and so that decisions and operations at risk of corruption have been carefully considered and treated, the Company therefore provide a written anti-corruption policy with clarification, understanding, and communication to the Board of Directors, the Board of Directors and employees at all levels thoroughly to provide clear guidelines for business operations and development towards a sustainable organization.

### **11.1 Objectives**

11.1.1 To ensure that the Company has established responsibilities, practices and appropriate actions to prevent corruption in all business activities.

11.1.2 To demonstrate the standpoint and intent of the clear participation of directors, executives and employees at all levels of the Company in anti-corruption.

### **11.2 Definitions**

11.2.1 Corruption means giving, asking or accepting to give or act in any form such as offering, promising, conferring, pledged to give property or any other benefit ("bribe"), etc., to government officials, government agencies, private entities or persons having duties, whether directly or indirectly, in order to or to induce such person to act or refrain from acting or performing duties that are unfavorable including requesting to accept or agree to accept property or any other benefit for oneself or others wrongly to act or omit to act or perform any duties, whether lawfully or not, except in the case where laws, regulations, announcements, rules, local customs or trade customs are permitted.

11.2.2 Stakeholders mean shareholders, customers, business partners, competitors, creditors, employees, society, communities, government agencies and related organizations.

11.2.3 Any other benefit means anything of value, such as a discount, entertainment, service, training, or anything in the same manner.

11.2.4 Gift means money, property, thing or any other benefit given to one another for hospitality or as a reward or give with affection or for relief or as a favor.

11.2.5 Asset refers to

- (1) Remuneration for speakers or trainers or consultants on behalf of the Company
- (2) Granting the privilege that is not a right reserved for the general public to receive a discount
- (3) Granting the privilege of receiving services or entertainment
- (4) Expenses for travel or tourism, accommodation, meals anything in the same manner.

(5) Card, ticket or any other proof, prepayment or post-refund

11.2.6 Tradition means a festival or important day on which a gift may be given and includes the occasion of congratulating, expressing gratitude, welcoming, expressing condolences or providing assistance according to the etiquette practiced in society.

11.2.7 Political contributions mean to help, whether financially or otherwise, to support a political party, purchasing tickets to fundraising events, or donating to organizations with close ties to political parties.

11.2.8 Sponsorships mean money paid for the purpose of benefiting the company's business, brand or reputation, which are risky because they are payments for services or benefits that are difficult to measure and track.

### **11.3 Scope**

The Company has set the scope of stakeholders related to anti-corruption policy with details as follows.

11.3.1 This Anti-Corruption Policy applies to persons working at all levels of the Company, whether they are contractual, fixed or temporary, consultants, trainees, employees who being sent to work temporarily elsewhere, domestic workers, temporary workers, agents, sponsors or other relevant persons.

11.3.2 Compliance with this policy is a condition of employment for all employees and must be observed in all areas where the Company does business.

### **11.4 Regulations of the Policy**

The Board of Directors, executives and employees will not commit or accept any form of corruption. The Company regards corruption as illegal and destroys the credibility of the Company's business operations. Therefore, employees at all levels must comply with this anti-corruption policy. It covers all business and all related transactions in order not to cause any damage to the Company and society by giving importance to good corporate governance, transparency, accountability, therefore the company has set regulations of the anti-corruption policy as follows:

11.4.1 Directors, executives and employees of the Company are prohibited from demanding or receiving benefits or assets that will lead to the wrongful conduct or omission of their own responsibilities or that may cause the Company to lose such benefits.

11.4.2 Directors, executives and employees of the Company are prohibited from offering or giving any benefits or assets to third parties in order to induce that person to act or refrain from doing anything illegal or unlawful in the responsibility of the Company.

11.4.3 In the event that any act of corruption occurs, it is considered a serious act and will strictly consider taking action against that person in accordance with the Company's regulations or the law.

### **11.5 Duties and Responsibilities**

11.5.1 The Board of Directors has duties and responsibilities in formulating policies and supervising the establishment of an effective anti-corruption system to ensure that the management has been aware, valued and instilled in the organization culture.

11.5.2 The Audit Committee is responsible for reviewing financial and accounting reporting systems, internal control systems, internal audit systems and risk management systems to ensure that they are in line with international standards, concise, up-to-date and efficient.

11.5.3 Executives have duties and responsibilities in establishing a system and promoting and supporting anti-corruption policies to communicate to all relevant employees, including reviewing the suitability of systems and measures to comply with changes in business, rules, regulations and legal requirements.

11.5.4 Internal Audit Department has the duty and responsibility to verify that the operations are in compliance with the Anti-Corruption Policy including guidelines, regulations and regulatory requirements to ensure that there is an appropriate and adequate control system against potential corruption risks and reports to the Audit Committee.

11.5.5 The Board of Directors, executives and employees of the Company at all levels must strictly adhere to the Anti-Corruption Policy and if not complying with this Policy shall be subject to disciplinary action.