ANTI-CORRUPTION

MEASURES



Objectives

Directors, Executives and Staff at all levels shall aware and conduct the duty with honesty.



Roles, Duties and Responsibilities

The Anti-Corruption Measures of Thanachart Group provide clear guidelines, and are defined the roles, duties and responsibilities of those involved as follow:

Board of Directors

- Determine and approve Anti-Corruption Policies.
- Approve and review guidelines.
- Monitor and encourage the efficient system.

Middle to High Executives

- O Control and direct the implementation of Anti-Corruption Measures.
- Support the development of processes, including personnel, in order to achieve the Anti-Corruption Measures in the organization.

Audit Committees

- Assure adequate internal control.
- Assure compliance with the Anti-Corruption Policy effectively.

5 Employees

- Understand and comply with Anti-Corruption Measures and other measures.
- Notify the clues immediately when found or suspected if there will be corruption, cooperate in the investigation.
- Employees shall not be involved in corruption, whether directly or indirectly.

President and Chief **Executive Officer**

- Promote, support and supervise so that all parties shall abide by the Anti-Corruption Policy.
- Review the appropriateness of the operation system and measures to comply with legal requirements.

Internal Audit

Review and audit operations to comply with relevent policy, measures, regulations, and laws.

Compliance Department

- Provide advice and recommendations on Anti-Corruption Measures.
- Supervise Anti-Corruption operations.
- Coordinate with relevant departments in publishing and providing knowledge regarding to Anti- Corruption Measures.
- Report the performance to Audit Committee.



10 Accounting and Tax Department

- Record, and maintain data and documents related to accounting and tax.
- Conduct financial procedures, accounting in accordance with generally accepted accounting principles.
- O Control the expenses in accordance with the rules and procedures of operation, reimbursement of expenses.



8 Risk Management Department

- Develop corruption risk assessment tools and review the risk of corruption at least every 3 years.
- Summarize the risk assessment results and presents to Audit Committee.
- Sather measures and guidelines to control, and review the corruption risks.



Human Resources Department

- Manage human resources in accordance with the Anti-Corruption Measures of Thanachart Group.
- Provide selection process, orientation and training including penalties for Anti-Corruption Measures.
- Promote the culture of practice from Anti-Corruption Guidelines.



11 Communication and **Brand Management** Department

- O Communicate and publish policies and measures against corruption and related activities.
- Communicate and report to the public regarding to Anti-Corruption of Thanachart Group.



Control Framework

Internal control system

All employees shall perform according to the rules and regulations of each business in Thanachart Group which is controlled and monitored in accordance with Anti-Corruption Measures.



2 Guidelines for working in accordance with the Anti-**Corruption Policy**

- Prohibit Directors, Executives and Employees at all levels to give or receive bribes in any form, including not act as an intermediary in offering or accepting bribes in any form.
- O Giving or receiving gifts, shall follow the regulations and can be monitored, the spending shall be in reasonable manner.
- Thanachart Group shall not support or provide political aid, whether directly or indirectly.
- Donation for charity shall be transparent, the financial support shall not be brought to use as an excuse for bribery, and reimbursement of expenses shall be in accordance with the prescribed approval guide, in case of doubt, consult Legal Department.



Rotation duties of employees

Encourage the rotation duties of employees responsible for jobs that are at risk of corruption.

