

ANTI-CORRUPTION POLICY



"Thanachart Group" realizes that corruption causes negative impacts and hinders social and economic development. This is incorrect business operation and creates unfairness in business, which damages ethical and business reputation of Thanachart Group. Therefore the Group has established an Anti-Corruption Policy by using official guidelines, including "Thailand's Private Sector Collective Action Coalition against Corruption" as code of conduct for all Directors, Executives and Employees to comply with.

Anti-Corruption Policy

Directors, Executives and Employees shall not tolerate any form of corruption in any circumstances, either directly or indirectly for benefit of the organization or business purposes.



Duties and Responsibilities

1 Board of Directors

Establish and approve Anti-Corruption Policy.



2 Audit Committee

Review to ensure that the organization provides adequate internal control and in accordance with the Anti-Corruption Policy.

3 Management

Control and supervise all Employees and relevant parties to comply with Anti-Corruption Policy.



4 Internal Audit

Assure the operation shall be in accordance with the Policy and practice guidelines.

5 Conduct and Practice of the organization

Directors, Executives and Employees are obliged to comply with Anti-Corruption Policy.



6 Relevant Parties to comply with Policies

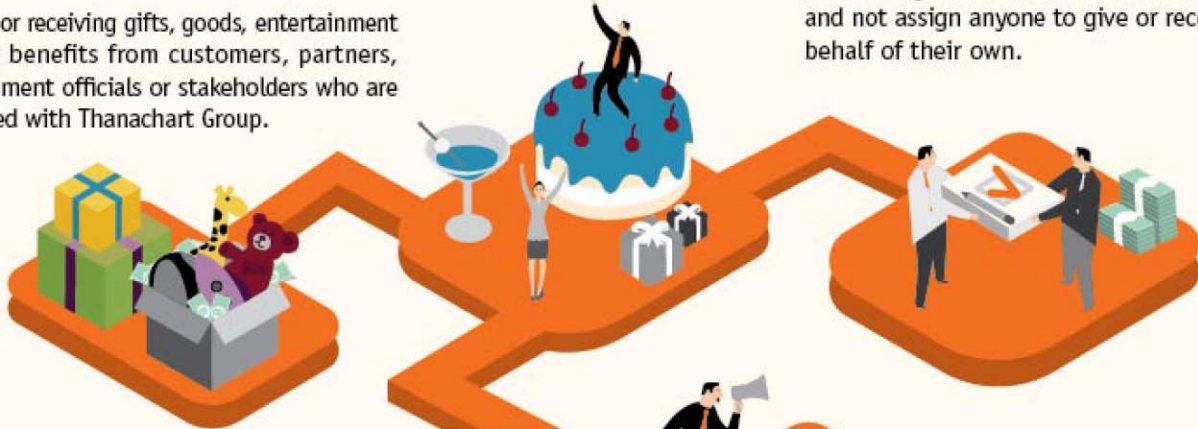
All Affiliate, Associate, and Subsidiary companies or business representatives of Thanachart Group shall abide by the Anti-Corruption Policy of Thanachart Group.

Scope and Guidelines

1 Precautions for corruption

🕒 Gifts, Entertainment and other benefits

Giving or receiving gifts, goods, entertainment or any benefits from customers, partners, government officials or stakeholders who are involved with Thanachart Group.



🕒 Prohibit of giving and receiving bribe

Shall not give or receive bribe in any form and not assign anyone to give or receive on behalf of their own.

🕒 Donation to charity, public interest and financial support

1. Transparency, lawful and not contrary to morality.
2. Donation to charity, shall not be used as an excuse for bribery.
3. Follow the process of reviewing and approving of donations to charity.
4. In case of uncertainty, address the issue to Legal or Management for advice.



🕒 Political donation

Thanachart Group does not support any political groups, political parties or politicians.

2 Maintaining corporate culture

Determine to create and maintain organizational culture that not tolerate to corruption.

3 Conducting against corruption

Directors, Executives, Staff at all levels shall not neglect or ignore when facing actions related to corruption and inform supervisor or the person responsible.



4 Fairness and protection

Provide fairness and protection to employees who report corruption case or reject corruption.



6 Human Resource Management

This Anti-Corruption Policy covers the human resource management process of recruitment, promotion, and performance evaluation of employees effectively.



7 Policy and designated guideline

Any operation shall be in accordance with the Anti-Corruption Policy; and the practice shall comply with the regulations as specified in the guidelines.



5 Promotion of Anti-Corruption Policy

Directors and Executives at all levels shall show integrity and be good role model and to strengthen as culture of Anti-Corruption.



8 Public relations

Promote the Anti-Corruption Policy via internal and external media.

Recommendations regarding Anti-Corruption Measure

In case Directors, Executives and Employees facing issue about their own practices whether in accordance with the Anti-Corruption Policy or not, the issue shall be considered, before the practice or making decision, as follows:



- Is this lawful action or conform to official regulations of Thanachart Group?
- Is this socially acceptable and could be disclosed to the society?
- Is this the acts that is contrary to ethics, and may damage the reputation of the stakeholders, third parties and Thanachart Group?

If unsure about this consideration process by yourself, please notify the issue and provide the information to supervisor.

Appendix



Government officials

According to the definition by law on the prevention and suppression of corruption, this is to include government officials, officers, employees, agents or any other person representing the following agencies:

- Ministries, or government agencies
- International organizations (such as World Bank, International Monetary Fund, etc.)
- Political party, anyone holding or candidating for political position and in provincial administrative organizations
- The agencies with regulatory authority (such as Securities & Exchange Commission (SEC), Bank of Thailand, The Stock Exchange of Thailand)
- Enterprises, companies or other organizations which the government or government agency owns or control the administration



Contributions in various fields

Including political contributions, charity donation, public interest and financial aid (sponsorships)

Political contributions

This refers to support under the name of organization whether it is financial aid or other forms to support political activities including loans. The other forms of assistance such as providing goods or services, advertising, promoting or supporting political party, buying tickets for events organized to raise fund or donate money to organizations that have close relationship with political party, except for supporting the democratic process that can be done according to the law.

Corporate philanthropy and donations for public interest

Corporate philanthropy is including activities that involve spending money without tangible return. Donations for public benefit are spending money for projects or activities to benefit the community, society, groups of people, which not receive a return with tangible assets.



Financial aid (Sponsorships)

Sponsorships differ from corporate philanthropy or public interest donations because the sponsorships are intended for business, brand, or corporate reputation.

Sponsorships could be a risk since it is a payment for services or benefits that are difficult to measure and track. Sponsorships may be linked to bribery; financial support may be hidden purposes by using sports for charity or charitable organization to cover up the unfair advantage.

Providing an advantage in decision making

Examples of advantages in decision making of government officials or related persons, i.e. giving or promising to provide business opportunities or auction, reducing or canceling fees, to assisting or canceling the requirements that require licenses that are not correct according to the normal decision process, canceling or reducing of legal requirements or giving or helping in access to government officials.

