



## -Translate-

### **Anti-Corruption Policy** **Sky ICT Public Company Limited**

Sky ICT Public Company Limited (the "Company") conducts its business with integrity, integrity, social responsibility and all stakeholders equally under the principle of good governance that is transparent, auditable and focused on anti-corruption, providing guidelines against corruption, including supporting activities that promote and instill in directors, executives, employees and employees at all levels, as well as representatives of the Company (collectively called "Company Personnel"), including subsidiaries, associates or other companies that the Company has control over, as well as Business Agents must comply with relevant laws and regulations and do not encourage the creation of work success by corrupt means. The Board of Directors has an anti-corruption policy to establish clear guidelines for business practices in accordance with the principles of good corporate governance and business ethics of the Company, regulations, requirements and related laws to further develop into a sustainability organization. For subsidiaries, associates, other companies that the Company has control over, as well as business agents, both registered or not listed on the Stock Exchange, it is appropriate to consider applying them to the business context through the internal approval process of each company.

#### **Purpose**

1. To raise awareness, values, attitudes for the company's personnel are not related to any corruption, including bribery, in any form, directly or indirectly.
2. To promote and create a culture of regulatory performance with integrity, integrity, and not to be ignored or ignored. When seeing corrupt acts involving the company, the supervisor or the person in charge shall inform the supervisor or the person in charge to acknowledge and cooperate in the scrutiny. If in doubt or inquiry, consult with the supervisor or the person designated to act in charge through the policy-defined channel of reporting the clues.
3. To promote the role and participation of relevant personnel, to prevent and combat corruption related to the Company's business.
4. To provide the Company's personnel at all levels, with an appropriate understanding of their characteristics, scope and practices, as well as consideration for approving gift giving-receiving, raising, donations, funding, political neutrality, and hiring government employees.
5. To build trust for stakeholders to conduct business together with integrity.

#### **Principles**

1. The company's business operations must be transparent, verifiable, to prevent all forms of corruption, directly or indirectly. Its personnel must strictly comply with anti-corruption laws and policies.



2. No company director, executive, and employee shall commit any act as a claim or acceptance of any property or other benefit for themselves, their family, friends, acquaintances, or any other person who implies to treat or refrain from performing their duties in a wrongful way or may cause the company to lose its righteous interest.
3. No company director, executive, and employee shall give or offer to give any property or other benefit to an outsider in order to motivate that person to commit or omit any act unlawful or unlawful to his office of duty.
4. Provide an effective and efficient internal control system, checks and balances the proper use of power to prevent company personnel from committing corruption or being involved in corruption and corruption.
5. This policy of corrupt management covers the process of personnel management, recruitment or selection of personnel, promotion, evaluation, employee performance, and return. It requires all levels of command to communicate with employees in order to use the business activities that are in charge of and supervise the practice.
6. Requires a regular review of the Anti Corruption Policy at least once a year, as well as a review of the Guidelines to comply with policies, regulations, regulations, announcements, laws, and business changes. This policy covers all activities related to the Company's operations, including its business, both domestically and internationally.

### **Scope**

The company defines the scope of stakeholders involved in the Corruption Anti-Corruption Policy in two groups as follows:

1. Within it consists of the Board of Directors, the Board of Directors, and the employees of the Company, its subsidiaries, its associates, other companies that the Company has control over, including business representatives at all levels.
2. External consists of customers, sellers of goods or services, partners, competitors, creditors, debtors, government / government agencies, private entities.

### **Definition**

1. Corruption means the unlawful pursuit of the directors, executives and employees of the whole group of companies or of your children and of your children or of your company's contracts, such as the making of false financial proofs, the taking of company assets to personal proofs, obstruction, embezzlement, cheating, acts of conflict of benefit, etc.
2. Corruption means the practice or omission of any form of wrongful exercise or exercise of authority in any position of duty, whether giving or accepting bribes, presenting or pledging to make requests or claims, whether property, money or cash equivalents, other items, rights or other interests, that are contrary to morality, ethics and law, regulation, policy, to public officials or private entities, or to any other person or entity engaged in business with a company or a group company, domestic or foreign, in order to obtain improper benefits, both to the organization itself. Family, friends and acquaintances.



3. Bribe means any property or other benefit offered to give, promise, grant, acceptance, grant, or request of any thing that affects one's judgment in an incentive manner to act or not to act contrary to his duty of responsibility.

4. A gift refers to any item of financial value, including property, cash substitutes, goods or services, including souvenirs.

5. Conflict of interest refers to a person or group of individuals designated as another person's representative making a decision with a direct or indirect personal interest involved. This interest may undermine or obstruct the interest of the person or group of individuals who have delegated authority to act instead.

6. Giving or receiving a gift means giving or receiving any gift, souvenir, or other property in accordance with a tradition, tradition, or local tradition, and means the opportunity of congratulations, expressions of gratitude, condolences, or expressions to represent friendship and good relations with each other.

7. Certification refers to spending for business certification, such as food and drink certification, performance certification, sports viewing, sports participation, domestic and international work viewing, including service, hospitality for the purpose of establishing business relationships, and other spending directly related to business practice or customary trade.

8. Giving or receiving support means financial or other forms of support to an activity or organization with the purpose of the company's business, image and good reputation, as a benefit to building commercial credibility and strengthening business relationships.

9. Donation refers to money or property donated by a company to benefit the public without the expectation of benefits that could be considered corruption and corruption.

10. Political party support means providing support to a political party in various forms of giving or donating money, things, gifts, raising, donating or providing other forms of support that can be valued as money, or providing indirect assistance, such as advertising support for political parties as well as participating in political activities, to gain a business advantage.

11. Facilitation refers to the small amount of expenses paid to government officials informally and is simply to ensure that government officials perform the process or to encourage them to do so more quickly. This process does not rely on the discretion of government officials and is an act of preference for that government official, as well as a legal right for the legal entity, such as obtaining a license, obtaining a certificate, and obtaining public service, etc.

12. External stakeholders refer to individuals, groups of people, or entities that influence the company's decision making process, which can affect the company's goals and achievements. Stakeholders also refer to those affected by the company's decision making process and those interested in the company's business practices.

13. A government official means a political office holder, a civil servant or a local employee who has a regular position or salary, an employee or person practitioner in a state enterprise or government agency, an executive, a local and a local councillor who is not a political office holder, a legal official of the nature of local government, and shall mean a



director, a subcommittee, an employee of a civil service, a state enterprise or a government agency, and a person or panel who exercises or is entrusted with the administrative authority of the state in the execution of any legal action, whether established in a civil service, a state enterprise or another state affairs.

### **Duty, responsibility.**

1. The Board of Directors has the following responsibilities:
  - a. Make policies and supervise effective anti-corruption systems to ensure that management is aware and focused on anti-corruption and cultivate it as a corporate culture.
  - b. Follow this policy and the measures against corrupt practices and bribes, and there are penalties when not followed.
2. The Executive Committee and the Executive have the following responsibilities:
  - a. It requires systems, promotes and supports anti-corruption policies to communicate to employees and related people and review them to be appropriate and consistent with changing circumstances: business conditions, regulations, regulations, and legal requirements, etc.
  - b. Provide measures and guidelines for implementing policies and principles against corrupt practices for the entire organization to implement.
  - c. Review of the Copyright Corruption Policy B Recommendations, Guidelines, Monitoring and Evaluation of Operations Related to Copyright Corruption, Copyright and Giving / Graft
3. Corporate Governance and Sustainability Committee
  - a. Directing, providing guidance on sustainability management frameworks and considering the company's sustainable policies, strategies, business goals based on environmental, social and governance dimensions (Environmental, Social and Governance - ESG) in line with changing circumstances and environmental factors based on good governance based on national standards and international standards.
  - b. Oversee, monitor, review sustainable development goals, strategies, practices and operations at least 2 times a year and push for implementation; build participation in the implementation of projects within the framework of sustainable development with relevant agencies, both internally and externally; focus on creating sustainable value for all stakeholders.
  - c. Consult, advice and recommendations on good corporate governance and sustainability practices to the Board of Directors, Management and Working Group in supporting the activities of the Company to achieve the goals of the Sustainable Development Policy.
  - d. Encourage communication with directors, management and employees, to be aware of and understand policies and practices related to raising standards of good corporate governance and sustainable development.



4. The Audit Committee is responsible for reviewing the financial and accounting reporting systems, internal control systems, internal audit systems and risk management systems, ensuring that they meet international standards, are concise, appropriate, modern and effective.
5. The Supervisor of Internal Audit is responsible and responsible for monitoring and auditing the operations as they are properly in accordance with the policies, practices, implementing powers, procedures and laws, regulatory requirements to ensure appropriate and adequate control systems against corruption risks that may occur and report to the Audit Commission.

#### **Code of Practice against Corruption**

1. The Company encourages and encourages personnel at all levels to see the importance and consciousness of anti-corruption corruptions, as well as to provide internal controls to prevent corruption, corruptions, giving or accepting bribes, in all their forms, directly or indirectly, whether giving / receiving money, items, gifts, endorsements, donations, support, government agencies, political assistance and any other benefits, for the exploitation of persons doing business with the Company.
2. The company has a policy not to demote, punish or negatively effect internal personnel who refuse bribes even if the act causes the company to lose business.
3. This anti-corruption and corps practice encompasses the process of personnel management, from recruitment or selection, promotion, training, performance appraisal, and employee remuneration, requiring bosses at all levels to communicate understanding with subordinate employees, to implement practices in business activities that are in charge, and to supervise practices effectively in line with this practice.
4. The Company shall provide fairness and protection to any employee or other person who has provided whistleblower or evidence of corruption in relation to the Company, including any employee who refuses to act by means of protection against the complainant or who cooperates in reporting corruption as defined in the Whistleblower Policy.
5. A person who commits corrupt conduct is considered an offence under the regulations on the work of personnel management, which is subject to a prescribed disciplinary review, including a legal penalty, if the act is illegal.
6. The company requires that anti-corruption policy be communicated through the company's communication channels, such as electronic mail, company website, announcement board, etc., as well as providing anti-corruption training to its personnel.
7. The company is focused on publishing, promoting knowledge and understanding with other individuals who must perform their duties related to the company, such as partners, external stakeholders, including agents and / or distributors, to contribute to raising good consciousness.
8. The Company will regularly review its practices and operational measures at least once a year to comply with changes in laws and business conditions.



## 1. Gift-giving practice

Company personnel can provide any gift, souvenir or other benefit to the interested party under the following conditions:

- (1) It is a gift to customers, partners of the company or government officials according to tradition, including the opportunity to congratulate, express gratitude, express hospitality, condolences, or provide assistance according to the etiquette practiced in society, not contrary to the relevant and customary laws, i.e. for Thailand not exceeding 3,000 baht per person per opportunity, according to the National Anti-Corruption Commission, and must not be cash or cash equivalent, such as vouchers or gift cards, and gift giving should be conducted to the same standard, no discrimination.
- (2) The gift must be given only on behalf of the company, not on behalf of the directors, executives or employees of the company.
- (3) Gift giving must be contextually appropriate, of appropriate value, and situationally correct, such as gift giving at the launch of a new product or service of the company, the celebration of the company's anniversary, and in case under tender, gift giving to government officials or relevant authorities should be abstained from.
- (4) The giving of a gift must not be malicious or an act to dominate, induce, or repay any person, to get involved or give in order to gain an advantage through an improper act, or to give in order to obtain a benefit.
- (5) No gift, souvenir, property, or other benefit shall be given to the spouse, child, or related person of any government official, client, partner, or person in contact with it, as by the circumstances it may be considered a substitute reception.
- (6) Gift giving must be recorded as a report of giving or receiving a gift or any other benefit and must be approved and approved only by the Company's Approval Authority.
- (7) No gifts shall be given to customers, company partners or government officials in the following cases:
  - It contravenes the relevant laws, regulations or policies of the Company and the regulations of the organization governing the Company.
  - It's a practical approach that doesn't meet business standards.
  - It's corruption or bribery.
  - Support for political activities

## 2. Gift acceptance practice

- (1) No claim or request for any gift, assistance, entertainment, compensation or other benefit from the customer or partner of the Company, external stakeholders, including agents and / or distributors, or persons associated with the business of the Company, shall be required under any circumstances.



(2) No gift or other benefit shall be received in any case from the customer or partner of the Company, outside stakeholders, including government officials, if there is an unavoidable need to receive any other item or benefit, or the personnel of the Company shall be in an undeniable situation in order to maintain a good relationship with that person or organization. The gift or benefit received shall not exceed THB 3,000 without cash or cash equivalent, and shall be received on traditional occasions on which the receipt of the gift shall not affect any business decision of the recipient, including the receipt of the gift in the following cases:

- In the case of a calendar, diary used as the publicity material of a customer or partner of the company, employees can receive it as a personal gift.
- In case of gifts, commemorations on behalf of the organization to the organization given to each other on important business occasions such as business visits, can be received by gift. Such souvenirs must be the property of the company.
- In the event that a company receives an award, souvenir, or item from a contest, such as a contract with a business partner or a reward for the company's work, it can receive the item on behalf of the organization by assigning an executive employee to receive it. This item will be the property of the company.

(3) If the personnel of the Company receive gifts or property or any other benefit on traditional occasions that have exceeded the normal value from a business associate with the Company, they shall report to the Supervisor in the hierarchy. If the Supervisor considers that it is not appropriate to return it immediately to the Giver, the Authority in contact with the Company's partners, customers, venture capitalists, or those involved in the business shall also regularly inform the relevant person of this policy.

### **3. Certification practice**

In order to adopt or be adopted, directors, executives, and employees of the Company should be aware of the following:

- (1) Do not adopt or be adopted by customers or partners in case
  - It is a violation of the laws, against the rules and / or policies of the Company, as well as through bribery and the regulations of the organizations governing its member companies, such as the Stock Exchange of Thailand and the Securities and Exchange Commission.
  - It is intended to influence business decisions and must follow the company's customs.
  - Causing discredit to the company's reputation.
  - To support political activities.



- (2) Certification shall not be intended to dominate, induce, or repay any person in order to get involved or to gain an advantage through improper acts or to obtain a benefit or to exchange any business purpose. But it should be organized to increase opportunities for the promotion of products of the Company or to create opportunities for better acquaintance of customers with appropriate and accurate value according to the circumstances. If the Company is under tender, it should abstain from reception and hospitality with relevant government officials or agencies.
- (3) Certification must be done only on behalf of the Company, not on the personal behalf of the Directors, management or employees of the Company.
- (4) The payment of business assurances and other related expenditures must be expenditures directly related to the conduct of the business to be capable of being committed; and must be reasonable expenses, not affecting operational decisions or causing conflicts of interest.
- (5) Spend for general certification must report to gift or other Benefits Considered and Approved by the Authority in accordance with the Regulation of Approval Powers for Proceedings or Delegates by Such Persons Approve Certification Fee and is intended to strengthen business relationships.

When a company or a conglomerate or an entity wishes to give or receive a gift or endorsement to anyone or an external entity which, according to tradition and or business tradition, maintains a good relationship with each other and is not contrary to the law, it can be implemented by following:

- Let the proposed agency or work department or receive matters to determine whether the giving or receiving of gifts, including recognition, is as required by the Company or the Group of Companies in its policies.
- If the established criteria are met, the relevant authorities shall make a report-form record of the giving or receiving of any gift or other benefit, presenting the matter for approval in accordance with the approved authority of the Company.
- The Accounting and Finance Department checks the pay warrant documents, sends checks to the authority, signs them, and stores all documents in the file so that they can be searched and verified.

#### **4. Donation practice**

Company personnel must treat with the following precautions:

- (1) The use of the company's money or property in the donation must be done on behalf of the company only.
- (2) Donations must be donations to foundations, charitable public organizations, temples, hospitals, schools, universities, nursing homes or organizations to benefit society.
- (3) Donations must be transparent and legitimate, ensuring that they are not used as an excuse for giving and accepting bribes.



- (4) Contributions must be recorded on the basis of the Contribution / Contribution Report and only subject to approval and approval by the Company's Approval Authority.
- (5) Approval of donations to the HR department is responsible for receiving donations from recipients and reviewing documents from foundations, public charities, and government agencies, as well as submitting all donation documents to the accounting department as evidence for verification.
- (6) If the inspection finds that any employee or group of individuals has a corrupt intent to bring cash / property / goods / materials to the donation or if the inspection finds that there is an irregular item or that the donation has been committed in corruption, causing the company to be damaged, the employee or group of individuals shall be liable for all damage caused, subject to serious discipline and disciplinary action according to the regulations of the company and shall report immediately to the Board of Service.

## **5. Funding practices**

Company personnel must treat with the following precautions:

- (1) That funding must ensure that it is not used as an excuse for giving and accepting bribes.
- (2) Directors, executives and employees of the Company shall not be intermediaries to offer money, property, things, or any other benefit to those involved in the business of the Company, including government agencies, in exchange for unwarranted privileges or to cause government officials to refrain from complying with prescribed regulations, regulations, and legal practices.
- (3) Work dealings with government agencies shall be transparent, and shall be conducted in accordance with the relevant laws, and bribes shall be prohibited and accepted in the conduct of business of any kind.
- (4) The funding must prove that the funding applicant has actually done the activity of the project and is an action to contribute to the success of the purpose of the project, to advertise the business, the brand of the company, or to the purpose of the operation with real social responsibility.
- (5) The use of money or property of the company to support the project must be identified only in the name of the company. By providing funding, it must have a business purpose, give a good image and reputation of the company. The disbursement must clearly indicate the purpose, have verifiable evidence and be conducted through the procedures of the company.
- (6) The subsidy seeker shall make a record of the subsidy report / subsidy report, stating the name of the subsidy recipient, details and purposes of the subsidy, which must be approved and approved only by the company's approval authority.



When a company or group of companies wishes to contribute money or grant money or property to a public charity; or when anyone or any agency wishes to receive donations or support from the company to a charity, follow the following procedures:

- Donating money or property to charity The agency proposing the matter must determine whether the donation complies with donation practice.
- Check contribution background information, such as having a clear purpose, having an existing agency, and being responsible.
- The relevant departments shall prepare a record of the contribution / support report and present the matter for approval in accordance with the approved authority of the Company.
- Have the agency or work department involved in the donation and / or the accounting and finance department provide the payment warrant / transfer warrant for the donation.
- The Accounting and Finance Department prepares checks for the authority to sign, tracks the proof of receipt of valid funds, cases of donation of property, requires proof of receipt of property, and stores all documents in the file, can be searched and verified.

## **6. Political party advocacy practices**

The company recognizes the importance of political participation as a socially responsible organization, but nevertheless, it adheres to the central Mai Mai Mai Mai, any political party or group, and does not support the activities of any political party, including any specific political candidate. The company has established clear practices to prevent wrongful political party support actions that may lead to corruption as follows:

- (1) No donation of money or other property shall be made to a political party. The Company shall not provide financial support to any political party either in the form of direct contributions or through foundations or other related organizations.
- (2) Do not use the Company's resources for political gain. Employees and management of the Company shall not use the Company's resources, such as working hours, vehicles or office equipment, to support the political activities of any party.
- (3) No privileges shall be granted to political parties or party members. The Company shall not grant any privileges to political parties or party members, such as the provision of special discounts, the provision of free services, or the provision of internal information.
- (4) Employees may participate politically as individuals, using personal time in addition to company business hours and using their personal resources to conduct political activities.
- (5) Directors or employees must resign as directors or employees if they hold political positions or run for local or national elections.



## **7. Practice of hiring state employees**

In order to ensure that the hiring of government employees has clear operational measures, it sets out the control measures as the following operational guidelines:

- (1) The company does not have a policy of hiring or appointing government officials who are still in office, except for enterprises that have requirements from the establishment to have representatives of government agencies in the organization.
- (2) Hiring or appointing a former government official who has left office or a person who has worked for a regulatory agency directly related to the company that is necessary or beneficial to the business of the company shall determine the cooling-off period for 2 years. By selecting, approving, hiring, and setting remuneration for hiring a government employee to hold a corporate employee position, the reasons for the need must be considered by the Chief Executive before hiring that government employee.
- (3) Selection, Approval of Hiring, and Remuneration Assignment, in the hiring of state officials to serve as directors and management employees, must be carefully considered by the Nominating Committee and remunerated and submitted for approval to the Board of Directors.
- (4) There should be a Due Diligence process for individuals to be appointed to the positions of directors, consultants and executives of the Company to investigate what may be a conflict of interest before appointment.
- (5) Disclosure of persons who are former government officials appointed as consultants / directors / executives of the Company with the reasons for their appointment in the Company's publications or annual reports to ensure transparency.
- (6) Let HR employees acknowledge the procedures for hiring state employees; if a state employee is hired into a job, approval must be considered before execution and disclosure in accordance with the above approval and reporting procedures.

## **8. Facilitation pay practice**

The Company has no policy of directly or indirectly paying public officials, customers, vendors, or other business partners in any form.

## **9. Procurement and third-party hiring practices**

Procurement shall comply with the regulations of the Company and shall be conducted with transparency, capable, verifiable, legitimate, no other covert interests, and the use of third parties to contact the work with government officials or government agencies shall not constitute the offloading of bribes to third parties.



### **A channel for whistleblowing or complaints.**

The Board of Auditors or the relevant agency will be the recipient of a whistleblower. Complaints of conduct that may cause suspicion of corruption that have occurred directly or indirectly to the Company through the channels of receipt of the matters set out in the Whistleblower Policy:

1. By email: [whistle-blower@skyict.co.th](mailto:whistle-blower@skyict.co.th)
2. By mail, by sending a letter to the inspection committee of Sky ICT Public Company Limited, No. 55, A.A.Capitol Ratchada Building, 6th-7th Floor, Ratchadapisek Road, Red Din District, Red Din District, Bangkok, 10400.
3. Online. By sending it to <http://www.skyict.co.th/contact/whistleblowing>

People who can raise clues or complaints about corruption are all stakeholders of the company:

Shareholders, customers, commercial competitors, creditors, government, community, society, executives and employees of the Company. Whatever the above-mentioned methods, the Company will keep the information of the informant confidential.

In case of enquiry, consultation for advice on the implementation of anti-corruption measures, you can contact by email: [whistle-blower@skyict.co.th](mailto:whistle-blower@skyict.co.th) or contact the Legal and Supervisory Department by email: [legal-group@skyict.co.th](mailto:legal-group@skyict.co.th)

### **Protection and confidentiality measures**

As a protection of the rights of complainants and informants acting in good faith, the Company shall conceal the name, address or information that can identify the complainant or informant and keep the information of the complainant and the informant confidential. Only those responsible for conducting the investigation of the complaint shall have access to the information.

The company will not demote, punish or negatively affect employees who reject corruption, even if the act causes the company to lose business opportunities.

### **Penalties**

All directors, executives, employees, employees and personnel of the Company are obliged to comply with the Anti Corruption Policy. The following acts are disciplinary offences. The Company shall consider the penalties in accordance with the regulations and regulations for the work prescribed by the Company, including termination of employment in serious and necessary cases, and the person shall be liable to make restitution for the Company or those affected by the act. If the act is against the law, the Company shall consider implementing another relevant law.

- Non-compliance with anti-corruption policies, corruptions and business ethics
- Recommends Encourage or encourage others not to follow anti-corruption policies.



- Ignoring when seeing violations or non-compliance with anti-corruption policies, where they know or should know, as they relate to the work under their responsibility.
- Not to cooperate or obstruct investigations. Investigations find out the facts that claim to have violated non-compliance with anti-corruption policies.
- Unfair acts against others because of the non-compliance of the anti-corruption policy.

To take effect from 14 November 2025 onwards.

-SOMKIT LERTPAITHOON-

(PROF. DR. SOMKIT LERTPAITHOON)

Chairman

Approved by the Board of Directors Meeting No. 9 / 2025

On November 13, 2025



## Annex a

### **A pattern of corruption that occurs frequently in enterprises.**

In order for all employees to have a consistent awareness and understanding and to be able to accurately identify prohibited behaviors that may be involved in corrupt practices, the company would like to clarify the most common forms of corruption in the organization, covering both actions against government and private sector entities. Please be careful, exercise discretion and do not commit any acts that may constitute corrupt practices, whether committed directly or through third parties (e.g., agents, consultants, partners), which constitute serious violations of the anti-corrupt policy as follows:

#### **1. Bribery (Bribery)**

- Bribery:
  - Paying money, gifts, or providing other benefits to public officials; to expedite the licensing process; or to win bidding for a project.
  - Kickback is given to the customer's company's purchasing staff to enable the customer to purchase the company's products or services.
  - Giving an unusually high commission to an intermediary or agent, knowing that a portion of the money would be used as a bribe.
- Graft:
  - Purchasing staff call for money or benefits from partners in exchange for approval for the partners to be selective vendors of goods.
  - Quality inspection workers (QC) receive luxury certification from the manufacturer factory, in exchange for discharge through non-standard goods.
  - Personnel managers receive money from job applicants to help them get hired.
  - Sales / marketing employees receive personal benefits, such as family travel trips, from customers in exchange for special discounts in addition to policies or longer payment terms (Credit Term) than usual.

#### **2. Embezzlement or fraud (Embezzlement / Fraud)**

- Disbursing false expenses, such as creating fake receipts or exaggerating travel expenses.
- The use of a company's assets, such as office equipment, stock goods or vehicles, for personal use or for sale.
- Accountancy employees transfer company funds to personal accounts or falsify financial documents to cover up corruption.



### **3. Forgery / Falsification**

- Correcting the numbers in the quotation to benefit a particular vendor.
- Signing a document in place of the Authority without permission
- Creating a false product test report to make the product seem to meet the standard.

### **4. Facilitation Payments or "kickbacks")**

- It is a small payment to an operational public official to speed up the normal work process that must already be done, such as paying a customs official a special payment to speed up the release of goods, or paying a local official to speed up the small licensing process that should be granted as a matter of right, remembering that this kind of payment is a form of bribe and is illegal in many countries.

### **5. Bid conspiracy (Bid Rigging)**

- Employees secretly tell other bidders the price information of their competitors to gain a competitive advantage.
- Agreeing with other companies participating in the auction to rotate to win each auction.

### **6. Misuse of Inside Information**

- Employees disclose trade secrets or business plan information to competitors in exchange for their personal gain.
- Tell your family to prepare for the company.
- Purchasing managers approve orders from companies owned by their spouses at prices above market price.

### **7. Giving gifts, raising certifications and other undue expenses**

Although gift-giving or business-customary endorsement may be acceptable, it immediately becomes corrupt if it is intended to incentivize unfair business decisions; or is highly valued beyond reasonable grounds:

- Giving unreasonably extravagant luxury gifts or receptions to customers or government officials, which may be seen as an attempt to influence decision-making.
- Giving gifts or catering at important times, such as during bidding for work, or during contract negotiations.
- Giving gifts or benefits to individuals in the client's family or government officials.
- Supporting travel or accommodation expenses to government officials or clients for "private vacations" by latent to business travel, without a clear and reasonable business purpose.



**Note :** The above items are just examples to achieve understanding, but they do not cover all forms of corruption acts. Employees must exercise judgment and adhere to the utmost integrity principles. Understanding these examples will enable employees to perform their duties confidently and accurately in accordance with good corporate governance or corporate governance. If an employee encounters or suspects that there may be acts committed in the corrupt corruption network, immediately request to report through the channel for reporting clues as defined by the company.



### Annex b

#### Report on the giving or receiving of gifts and hospitality services or any other benefits.

Date.....

I, Mr./Mrs./Ms.....

Position.....

Department.....

Division.....

Request for Report  Request for Approval

Gift giving and hospitality service or any other benefit.  Gift receiving and hospitality service or any other benefit.

With the following details

Sequence	Giver Name - Receiving / Agency Name	Purpose	Value (Baht)	Date, give - take.



Sign.....Report recorder (.....)	Sign.....Commanding officer. (.....)
Sign.....Approval (.....)	
Sign.....Human Resources Management (.....)	



**Appendix c**  
**Contribution / Contribution Report Form**

Date.....

I, Mr./Mrs./Ms.....

Position.....

Department.....

Division.....

Donate to charity  Support money

With the following details

Department/Unit .....

Contact Person .....

Position .....

Phone Number .....

E-mail.....

Activity or Project Name .....

Address.....

The purpose of obtaining a donation or obtaining a grant.

.....  
.....  
.....

Value of items or cash amount requested for approval.....



### Background document

<input type="checkbox"/> Agency donation / support request
<input type="checkbox"/> Establishment archives of organizations requesting donations (if any)
<input type="checkbox"/> The document clarifies the project for which contributions are requested / requested.
Account number details. In case of requesting support in cash.

The document must be delivered within 7 working days after the operation.

<input type="checkbox"/> A thank you book or card or receipt (in case of donation) stating the name, address of the recipient of the donation or support, item and amount, fully accurate or tax bill (in case of purchase of the donation)
<input type="checkbox"/> Delivery Activity Photograph or donation Accompaniment Photograph

Sign.....Report recorder (.....)	Sign.....Commanding officer. (.....)
Sign.....Approval (.....)	