
Document Version Control log

Version	Summary of revision	Prepared by	Approved by	Date of approve/Review
1	Formulation of the Anti-Corruption Policy	Compliance	Board of Directors	23 May 2013
2	Review of the Anti-Corruption Policy	Compliance	Board of Directors	25 June 2015
3	Review of the Anti-Corruption Policy	Compliance	Board of Directors	29 June 2017

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1. General Provisions

1.1. Objectives

- 1.1.1 To formulate the policy statement on anti-corruption to which the Management Company will strictly adhere in its business operations
- 1.1.2 To provide the Management Company with a guideline for countering bribery and any form of corruptions, both direct and indirect

1.2. Scope of this Policy

This policy applies to the Management Company as a guideline for formulating the policies rules and operating procedures related to the Policy for Anti-Corruption unless there is stricter or more stringent and more comprehensive requirements imposed.

1.3. Exception to compliance with this Policy

"n/a"

1.4 Related laws, regulations and Policies

This Policy is related to laws and regulations including but not limited to

- Prevention and Suppression of Corruption Act B.E. 2542 and its amendments only for the parts related to duties of the private sector towards governmental officers or agencies regardless of any future revisions, amendments and additions
- The Spirit & The Letter (S&L)
- Gift and Entertainment Policy
- Other relevant laws, regulations or requirements (if any)

1.5 Effective date

Effective on the Board of Directors approved this Policy, dated 29 June 2017 onward.

1.6 Frequency of review

Every two years or upon any significant changes.

1.7 Revision

Revision of this Policy shall be approved by the Board of Directors

1.8 Owner of this Policy

Compliance Department

2. Main Provisions

2.1 Definition¹

2.1.1 **“Corruption”** means the seeking of improper benefits for your own or others through any direct or indirect means which may include political contributions, charitable contributions, sponsorship, gifts, entertainments and other expenses, etc., especially if such acts are caused by misuse of authority including offering, giving commitment, accepting, requesting, demanding, giving or accepting bribes, persuading someone to commit illegal acts or destroying trust, or any acts which involve corruption and cause inequity and damage to the Management Company, the economy, society as well as confidence of related parties.

2.1.2 **“Illegal Political contributions”** means any forms of financial assistance including lending or any other forms such as providing goods or services; advertising, promoting or supporting a political party; buying tickets for an event held for fund raising or donation for entities having close relationship with a political party in order to support political activities, etc., should they deem to be illegal.

2.1.3 **“Charitable contributions”** means donations of money, things or any other benefits to any persons or juristic persons which may be incorporated with some hidden purposes, such as charitable organizations, foundations or funds, etc.

2.1.4 **“Sponsorship”** means financial support which is given for the purpose of business undertaking, brand promotion or reputation of the sponsor.

2.1.5 **“Gifts, entertainments and other expenses”** means expenses paid for gifts or things of monetary value including money substitutes and those which can be converted into goods and services

2.2 General principles

2.2.1 The Management Company will operate its business with honesty, integrity, transparency, equity and fairness, and will uphold the principles of good governance and professional ethics.

2.2.2 The Management Company will not tolerate any direct or indirect corruption or violation of anti-corruption principles laid down by the Management Company.

2.3 Roles, duties and responsibilities

2.3.1 Board of Directors

The Board of Directors approves this policy as well as oversees the compliance with respect to the Policy for Anti-Corruption.

2.3.2 Management Committee

¹ Source: Self-Evaluation Tool for Countering Bribery, Private Sector Collective Action Coalition Against Corruption

Consider and advice as well as oversee the compliance with respect to the Policy for Anti-Corruption measure.

2.3.3 Compliance Department

2.3.3.1 Give advice and recommendations on anti-corruption

2.3.3.2 Supervise / review anti-corruption activities

2.3.3.3 Facilitate trainings / knowledge dissemination related to anti-corruption

2.3.3.4 Report related results and perform other duties which are relevant to this policy

2.3.4 Groups / departments / employees

All employees shall duly comply with this policy. Groups / departments are responsible for formulating / revising their policies, operating regulations and/or operating manuals to ensure alignment with the principles laid down in this policy as well as ensuring that all employees strictly comply with this policy.

2.4 Requirements

2.4.1 Prohibitions

2.4.1.1 Giving and accepting of any forms of bribe or money or benefit that might cause to be a corruption or corrupt are prohibited.

2.4.1.2 Preparation of off-record accounting or separate accounting to facilitate or conceal improper payment is prohibited.

2.4.1.3 Providing of money or pay-off any remuneration or any other benefits for illegal political contributions is prohibited.

2.4.2 Other requirements

2.4.2.1 There shall be risk assessment measures related to potential corruption which cover all functional units and activities.

2.4.2.2 Measures, procedures and operating processes must be established in line with the policies and shall adequately and appropriately cover all activities involving risk of corruption. These measures, procedures and operating processes shall also cover the establishment of relationship with third parties who are related to the Management Company's business such as distributors, government officials, any persons or businesses, etc.

2.4.2.3 Information and news must be completely and correctly communicated and reported to the public without being distorted.

- 2.4.2.4 There shall be communications and trainings for employees to promote their understanding of the anti-corruption policy and guidelines.
- 2.4.2.5 There shall be a whistle-blowing channel for employees and external persons. Also, persons responsible for fact-finding and handling complaints shall be assigned for investigation purposes. Also, the whistle blower and the employees, who refused to any corruption activities, shall be protected. Although, it may result in the company losing business opportunity.
- 2.4.2.6 There shall be adequate and appropriate internal control system and keeping of documents and important data for examination and reporting.
- 2.4.2.7 The compliance with this policy shall be regularly monitored, reviewed and audited.

2.5 Penalty

Employees who violate this policy will be subject to disciplinary action according to the Management Company's rules and may be considered committing an offence under other relevant laws, rules or requirements.

2.6 Interim provision

Policies, operating regulations and operating manuals which are not contrary or contradicting to this policy or which are stricter than this policy shall remain effective. As regards to policies, operating regulations and operating manuals being contrary or contradicting to this policy or being inequivalent to this policy, amendment of such policies, operating regulations and operating manuals by functional groups / departments being owners of products or services shall be completed within 60 days from the effective date of this policy.