

Summary of the Anti-Corruption Procedure

The Company is committed to adhering to a vital principle of anti-corruption measures. This principle forms a basis for operational guidelines and standards that discourage activities that may lead to corrupt practices in the course of professional duties or may be used as a means of improper business practices. To promote business practices that conform to the principle of good governance so as to instill confidence in the organization among all stakeholder groups, the Company has thus formulated anti-corruption policy as part of its corporate governance policy, which has been publicly disclosed on corporate website, and has prepared a summary of anti-corruption measures as detailed below.

- **Corruption** means any forms of bribery, whether it be offering, promising, giving, pledging, soliciting or accepting money, property or any other improper benefits, to public officers or entities, foreign government officials, international organization officials, private entity staff, or any person in charge in a direct or indirect manner. The purpose is to induce foregoing individuals to take certain action or derelict their professional duties so as to gain or retain business or introduce business to any particular company, or to gain or retain any other improper commercial benefits, except otherwise permitted by local laws, regulations, official notifications or rules, or observed in local customs or customary trade practices.

In addition, the Company also prescribes definitions of other terms, such as bribe, offering and accepting gifts, entertainment, facilitation payment, and conflict of interest, for adoption as standard terminology by its employees and to ensure common understanding among employees.

- **Risk assessment:** The Company and its subsidiaries has developed risk management in key areas in accordance with the consolidated supervision principle of the Bank of Thailand. In addition, a risk control self-assessment (RCSA) process has been put in place to monitor corruption risk on a regular basis every year. In this process, risk assessment findings are presented to the Risk Management Committee for consideration before submitting an annual report to Krungthai Bank PCL.
- **Practice guidelines:** The Company prescribes guidelines in line with anti-corruption measures for adoption as practice guidelines by employees. Details are as follows:
 1. **Offering and accepting bribes:** Prohibit offering or accepting any forms of bribe, including acting as intermediary in offering or accepting a bribe, to gain improper business benefits.
 2. **Offering and accepting gifts or other benefits:**
 - 2.1 Refrain from offering gifts or other benefits of high value (more than 10,000 baht), unless approved on a case-by-case basis.
 - 2.2 Refuse gifts or other benefits of high value (more than 5,000 baht). If you cannot refuse an offer, you may share it with staff in your work unit or send it to a concerned entity for sharing or give it away as charitable donation.
In case gifts or other benefits are given or received on the basis of personal relationship or they are from relative, family member or friend, these criteria will not apply.
 3. Entertainment is allowed in traditional or customary occasions.

4. Political support: The Company does not grant political support. However, employees have the right to engage in political activities as set out in legal provisions.
 5. Donation for charity and public interests and causes: Exercise precaution to ensure that donation will not be used as a means to avoid bribery by scrutinizing entities accepting donation and requesting documents used as donation evidence.
Facilitation payment: Prohibit facilitation payment in any forms to exchange for facilitation services to expedite business operation.
- **Guidelines on prevention of conflict of interest:** The Company prescribes guidelines on prevention of conflict of interest in the corporate governance policy.
 - **Guidelines on whistleblowing and filing of complaints against corrupt practices:** All stakeholder groups of the Company can report tip-offs or file complaints via channels specified in the corporate governance policy, and they are required to declare their first and last name and clearly describe complaint in details. The Company will provide protection for whistleblower or complainant. Even though such action may cause a loss of business opportunities, the Company will give a fair treatment to accused person in such matter. Moreover, it also has a review process for handling of whistleblower reports and complaints as set out in relevant SOP manual and has set up a compliance unit to play a central role in providing consultation and following up on tip-offs and complaints.
 - **Recording of business information:** Reimbursement of operating expenses of the Company must be undertaken as per each work unit's budget, and supporting documents for reimbursement must be made available. Moreover, recording of financial information must be done according to accounting standards.
 - **Internal control:** The Company has developed policies, regulations and SOP manuals to define clear roles and responsibilities and set up an internal control unit to conduct audit work and evaluate adequacy of the internal control system.
 - **Human resources and training:** The Company provides SOP manuals specifically developed for human resources, covering recruitment, hiring, training, evaluation, promotion and punishment processes. Moreover, for engagement of public officials, the Company has established a process to ensure that such engagement is not an exchange for any benefits that may damage its image and credibility. Such engagement is considered a corruption risk.
 - **Communication:** The Company requires communication on compliance with anti-corruption policy to employees and other stakeholders, and information about this policy and relevant activities are disseminated through various communication channels, such as intranet, corporate website, Form 56-1, One Report, or sustainability report. In addition, the Company also regularly conducts training to refresh knowledge and understanding and raise awareness about corruption among its employees.
 - **Punishment:** Corruption offenders shall be subject to disciplinary action as set out in the Company's regulation, and wrongdoer may be subject to legal punishment if such offense is an unlawful act.