

The Anti-Corruption Practice
Thantawan Industry Public Company Limited

Objectives

1. To be used as a practice for the performance of employees within the Company in order to have the same procedures of standards and practice.
2. To be used as a practice for managing within the Company.
3. To provide the system administrator know the needs of the employees within the Company and used to improve and develop efficiently.

Principles and practice

1. Giving gifts, souvenirs or other benefits

- 1) Giving gifts, souvenirs or other benefits by traditionally can do without a violation of the relevant laws. Local customs should be provided in a form that promote the image of the Company, Products that promote sustainable development, or generating income for the community as follows;
 - A. Calendars and Diaries.
 - B. The Company's products.
 - C. Products used as public relations media of the Company.
 - D. Royal Project Products, the Royal Initiative, Community products that generate income for the community, or products that promote sustainable development.
- 2) Giving gifts, souvenirs, or other benefits should be equally treated in order to prevent discrimination.
- 3) Do not offer any gifts, souvenirs or other benefits to spouses, children or persons involved with government officials, business partners, value customers, and contacting persons because these behaviors are considered as acceptance instead.
- 4) Giving gifts and souvenirs on important business occasions, such as the establishment day or business contract signing, can do but if the value of gifts, souvenirs or other benefits is exceeded 3,000 baht (three-thousand-baht total), it must be approved by the Managing Director or the Company's regulations.
- 5) Giving gifts, souvenirs must have a financial evidence that showing the value of the property for verification.

2. Accepting gifts, souvenirs or other benefits

- 1) Employees of the Company refrain from accepting gifts, souvenirs or other benefits in all circumstances as well as having a duty to inform all outsiders about the anti-corruption policy thoroughly.
- 2) In the situation that is necessary to accept gifts, souvenirs or other benefits and cannot refuse. It should be sent to the Managing Director or departments appointed by the Company to be responsible to record an information and collect such items for the Managing Director to consider and continue to comply with the Company regulations.

3. Hospitality and receptions

- 1) Hospitality and receptions are for business receptions such as the receptions for food and beverages, sports receptions entertainment and other spending directly related to business practices or traditional. Including providing business insight knowledge which situation able to do but it must be a reasonable expense and does not affect the decision making of the receptionist, which may cause conflicts of interest.
- 2) Hospitality and receptions must have a financial statement showing the value of the reception for further verification.

4. Accepting proposals, meetings, trainings, seminars and business visits using business partners' budgets

- 1) Accepting proposals for meetings, training, seminars and business visits by spending the business partner's budget can be done if it met the conditions specified in the contract. Yet, it must not have a sign of tourism characteristics.
- 2) Accepting proposals for meetings, training, seminars and business visits by spending the business partner's budget in the case that it is not specified in the contract agreement can be done if considering that the said proposal is appropriate and benefits to the Company. This must be approved by the supervisor and regarding to the Company's regulations.
- 3) Not accepting offers for training, and seminars that has a sign of tourism characteristics without the intention of truly transferring knowledge.

5. Activities arrangement and Corporate Social Responsibility

- 1) Activities arrangement and Corporate Social Responsibility together with government officials, Government agencies, or various organizations can be done appropriately. It must be done on behalf of the Company and has objectives as regards with company policies, should have clear criteria and evaluation plans, and proceed through the process and company regulations as specified.
- 2) Organizing Corporate Social Responsibility activities or any activities on behalf of the Company must not be or are not related to the support of political parties.

6. Donations and support to government officials, government agencies including charities

Any donations and support to government officials, government agencies including charities must perform under the following conditions;

- 1) The organization is reliable and/or legally established
- 2) It is an act on behalf of the Company which operates correctly under the law, the Company regulations and being transparent.
- 3) It should not pay or offer cash substitute items to government officials, or directly to any persons unless it clearly stated in the request for support with a proof of support in writing.

- 4) Monitoring should be done in order to ensure that donations or support has been spent for public benefit and/or meet the donation objectives and/or truly support.

7. Political assistance

The Company has a neutral business policy, supporting legal compliance, and democratic system. The Company has no policy to support the activities of political parties, politicians in exchange for special privileges, or direct or indirect disapproval benefits. The Board of Directors, the executives, staff and employees of the Company are able to participate in political activities according to personal liberty rights but this should proceed as follows;

- 1) Should not express in the way that makes others understand that the Company is relevant, concentrates or supports political actions.
- 2) Do not dress in the Company's uniforms or apply any symbols to make others understand that you are employees of the Company in participating in political activities.
- 3) Do not pretend to be the Company's employee for credibility in order to find a coalition of political expression.
- 4) Avoiding an expression or expressing political views in the office or during working that may cause conflicts in the workplace.

Policy communication within organization and external parties

- 1) The Company is aware of the importance of disseminating knowledge and understanding with others who have to perform duties related to the Company or may affect to the Company including the public in matters that must comply with the anti-corruption policy.
- 2) The Company has made written recommendations regarding anti-corruption measures and provide channels for dissemination. For instance, posting on public relations boards, intranet system, email, the Company's website etc. In order for everyone in the Company to understand, accept, and comply with the anti-corruption policy appropriately.
- 3) The Company arranges an orientation, training, seminars about anti-corruption policy for the Directors, the executives, staffs and employees of the Company to be informed and implement appropriately.
- 4) The Company communicates and disseminates anti-corruption policy including channels for whistle blowing measures or complaints and penalties for failing to comply with the anti-corruption policy for the insiders to be informed via various channels. For instance, posting on public relations boards, intranet system, email, the Company's website etc. In order for everyone in the Company to understand, accept, and comply with the anti-corruption policy.
- 5) The Company communicates and disseminates anti-corruption policy including channels for whistle blowing measures or complaints to the public, subsidiary company, associated company, others companies that the Company have controlling power and business representative, business partners and the stakeholders through

various channels such as the Company's website, Annual report, Annual Registration Statement (56-1 Form) etc. To create the understanding and support to adhere to social responsibility standards in the matter of anti-corruption as well as the Company.

- 6) The Company has prepared contract documents that stating conditions or remarks to customers or business partners to be signed and informed to acknowledge the anti-corruption policy in the documents attached to the Company's contract.

Whistleblowing measures and complaints about anti-corruption policy

The Company has a channel for complaints and whistleblowing a corruption which covers receiving complaints, investigation and conclusion. The Company also has a protection of the whistleblower and related persons to acknowledge the complaint and comments or suggestions from stakeholders who are affected by the company's business operations or from the performance of directors' duties and the Company's employees about illegal actions including behaviors that may indicate corruption.

1. Scope of whistleblowing and complaints.

- 1) See any actions indicating or may indicate a direct or indirect corruption involving the organization such as staffs are offering or receiving bribes from government officials or private sectors.
- 2) See a violation of the Company's procedures or affecting the internal control system of the Company which indicates or may indicate a corruption.
- 3) See any actions that cause losing benefits or affecting the reputation of the Company.
- 4) See a violation of the law, morals and ethics of the Company.

2. Investigation and penalties

- 1) The Audit Committee collects clues and evidence to investigate the facts, making summary reports and present to the Audit Committee for consideration.
- 2) If the alleged person actually committed corruption, the offender must be disciplined according to the Company's regulation. Furthermore, if the act of corruption is against the law, the offenders may be punished by law.
- 3) Any dishonest complaint, clues, statements or information, if it is done by employees of the Company, they will receive disciplinary action, which the Board of Directors will consider and set the penalties appropriately.

Measures for protection of complainants or whistleblowers and related persons

To protect the rights of the complainants and whistleblowers acting in good faith. The Company will conceal names, addresses, or any information that can identify the complainant or whistleblowers and maintain the information of the complainant and whistleblowers is confidential which is limited to those who are responsible for investigating complaints and have access to such information. In the case of a complaint, the Audit Committee will protect the whistleblower or the complainant, the witness, and the person who provided the information in the investigation not to suffer dangers arising from

whistleblowing, complaints, and the witness or providing information. The complainant send the complaint directly to the Audit Committee. The person, who receives the information from the duty related to the complaint, is responsible for maintaining the information of the complaint and the evidence of the complainant and the person who providing the information is confidential, do not disclose the information to other people who have no duty except as disclosed by law.

Questions about policy and practice

The Company assigned the Human Resources Department or responsible person for answering questions about anti-corruption policy. When the company's personnel have any questions or need any advice in order to avoid actions that are related to corruption, they can consult with the Human Resources department.

When the Company's personnel face a situation that is uncertain in deciding whether the actions are against the anti-corruption policy. They have to do as follows;

Ask yourself the following questions:

- 1) Is the action illegal? If against the law, "stop doing".
- 2) Does the act violate the Company's policy or not? If it breaks the policy, "stop doing".
- 3) Is the action against values or the Company's culture or not? If it contrary to values or culture, "stop doing".
- 4) Does the action have a negative effect on the image of the Company? If it affects the image of the Company, "stop doing".
- 5) Does the action affect the Company's stakeholders? If it adversely affects them, "stop doing".
- 6) Is the action causing bad practices in the future? If bad practices will occur, "stop doing".

Inspection process, internal control and data recording

1. In order to have an effective anti-corruption policy, the Company assigns all departments to assess the risk and formulate a risk management plan for corruption from operations that require coordination with external departments such as procurement, sales of products, extension of various licenses etc. in the written statement including internal control systems and management to prevent the occurrence of corruption.
2. The Internal Auditor reviews the risk management plan and internal control systems of all departments prepare for annual audit plan to ensure that all work lines comply with the internal control system that is defined. If there is an issue that is not consistent with the anti-corruption policy, the responsible department must be notified in order to improve the internal control system to be suitable and summarized as a report and send to the management team and the Audit Committee.
3. The Company provides procedures for document and various notes storages to be ready for inspection to confirm the accuracy and suitability of financial reports as well as procedures to ensure that there are no items that have not been recorded or cannot explain or false lists.

4. The Company has an inspection procedure to ensure that the internal control system and information storage properly and comply with the anti-corruption policy.
5. The Company has the Internal Auditors and assigns them to examine the internal control system complete with advices, suggestions and solutions to improve or develop an efficient and effective internal control system.
6. The Internal Auditor can report any issues to the managing director, the management team, and the Audit Committee for reporting to the Board of Directors.
7. The Company requires a check and review the anti-corruption policy and operational guideline on a regular basis in order to be related with the change of business conditions and regulations, and the provisions of the law.

Procedures

1. Giving gifts, souvenirs or other benefits

- 1) The requestor proposes details of giving gifts, souvenir or other benefit to the supervisor for consideration.
- 2) The supervisor of the requestor reviews the details before proposing to the authority in accordance with the regulations on approval authority and the use of the approval authority table for consideration.
- 3) The person with power to consider the details of giving gifts, souvenirs or other benefits to ensure that the purpose of giving gifts, souvenirs or other benefits adhere to the principles and practice of the Company for consideration and approval.
- 4) The requestor presents an evidence of gift, souvenir or other benefits such as receipts and send to the Accounting Department as evidence for accounting records in accordance with the specified operational procedures.
- 5) The Accounting Department reviews an evidence of gift, souvenirs or other benefits. If the evidence is insufficient, The Accounting Department will notify the requestor to request additional information or clarification. If the fact that the gift, souvenir or other benefit are not following the Company's practice, or to use as an excuse for corruption, the company will punish the offender with the highest penalty.
- 6) The Internal Audit Department monitors the process of giving gifts, souvenirs or other benefits in order to ensure that the process of giving gifts, souvenirs or other benefits is efficient, effective and appropriate internal control.

2. Accepting gifts, souvenirs or other benefits

- 1) The staff will prepare a gift slip, souvenir, and send documents together with gifts, or souvenir to the department which is appointed by the Company as follows;

For the Head Office at Omyai and the Branch Office at Tuangtana Nakorn, it will be sent to the Human Resources Department.

For the Sale office at Suntower, it will be sent to the Managing Director.

- 2) The responsible department takes photos of souvenirs, recording information, and attaches photos in the control registration of gifts or souvenirs to issue codes and attaches to the received items.
- 3) The responsible department specifies the code on the delivery note of gifts, or souvenirs and document storage and those received items at the designated place.
- 4) The responsible department delivers the control registration of gifts, or souvenirs to the Managing Director for acknowledging.
- 5) The Managing Director considers the control registration of gifts, or souvenirs for appropriate use such as raffle gifts, or donations, etc.

3. Hospitality and reception

- 1) The requestors present the hospitality and receptions such as name-surname, workplace and position of all certified persons as well as a list of the company's employees participating in the certification for the supervisor consideration.
- 2) The supervisor of the requestor reviews it before proposing to the authority in accordance with the regulations on approval authority and the use of the approval authority table for consideration.
- 3) The authority considers the hospitality and receptions to ensure that the purpose of the hospitality and receptions follow the company's practice for consideration and approval.
- 4) The requestor sends the documents to the Accounting Department to proceed with advance payment before the hospitality and receptions with evidence of hospitality or receptions such as receipts as evidence for financial records in accordance with the specified operational procedures.
- 5) The Accounting Department reviews proof of hospitality or receptions. If the evidence provided by the requestor is insufficient, the Accounting Department will notify the requestor to request additional information or clarification. If the hospitality or receptions are not following the company's practice or to use as an excuse for corruption, the company will punish the offender with the highest penalty.
- 6) The Internal Audit Department arranges for the hospitality and receptions inspection to ensure that the hospitality or receptions is efficient and effective and has an appropriate internal control.

4. Accepting proposals for meetings, trainings, seminars and business visits by spending the business partner's budget

This should meet the following criteria;

- 1) This must be directly related to the business or a tradition which must be done with transparency and does not affect to the performance decision or causing conflicts of interest.
- 2) This must not conflict with laws, regulations and the company's policy.

- 3) This must not have a sign of tourism characteristics and it is considered that the acceptance of the proposal is appropriate and benefits to the Company. This must be approved by the supervisor and the specified operating procedures.

5. Corporate social responsibility activities

- 1) The requestor presents the details of the social responsibility activities to the supervisor for consideration.
- 2) The supervisor of requestors reviews the activities before presenting to the Corporate Social Responsibility Department and corporate communication for consideration.
- 3) The Corporate Social Responsibility Department and corporate communication consider and prepare the annual plan before presenting the authority in accordance with the regulations as regards with approval authority and the use of the approval authority table for consideration.
- 4) The authorize person consider the details of the social responsibility activities to ensure that the purpose of the activities follow the company's practice for consideration and approval.
- 5) The Corporate Social Responsibility Department submits documents such as the annual plan, event details, etc. to the Accounting Department for the advance payment of the social responsibility activities and manage an expense with an evidence of social responsibility activities such as receipts, images, etc., as evidence for accounting records in accordance with the established operational procedures.
- 6) The Accounting Department reviews an evidence of social responsibility activities. If the evidence provided by the requestor is insufficient, the Accounting Department will notify the requestor to request additional information or clarification. If the social responsibility activities are not following the company's practice or to use as an excuse for corruption, the company will punish the offender with the highest penalty.
- 7) The Internal Audit Department arranges an examination of the process of social responsibility activities to ensure that the process of activities, or corporate social responsibility is efficient and effective and appropriate internal control.

6. Financial supports, donations and subsidies

- 1) The requestor presents details of request for financial supports, donations or subsidies to the supervisor for consideration.
- 2) The supervisor of requestors reviews the request before presenting to the authority in accordance with the Company's regulations of the approval and the approval authority table for consideration.
- 3) The authorize persons consider the details of financial support, donations or subsidies to ensure that the objectives of providing financial support, donations and subsidies are complied with the company's practice.
- 4) The requestor provides an evidence of financial support for donations or subsidies such as a thank you letter from the department that accepts financial supports, donations or subsidies, photographs or receipts, etc. and

send the evidence to the Accounting Department as evidence for accounting records after the proceeding of provide financial supports, donations, or subsidies.

- 5) The Accounting Department reviews an evidence of financial supports, donations or subsidies. If the evidence is insufficient, the Accounting Department will notify the requestor to request additional information or clarification. If the fact that the financial supports, donations or subsidies are not following the company's practice, or to use as an excuse for corruption, the company will punish the offender with the highest penalty.
 - 6) The Internal Audit Department monitors the process of financial supports, donations or subsidies to ensure that the process of financial supports is efficient, effective and appropriate internal control.
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Considered by the Nomination Committee determine remuneration and good corporate governance's meeting no.3/2018

on August 14, 2018.

Approved by the Board of Directors meeting no. 7/2018

on August 14, 2018.

Gifts or souvenirs delivery notes

Document numbers _____

Date _____

Givers	Details of gifts / souvenirs	Receivers	Value		Supervisors	Notes
			<3,000 Baht	>3,000 Baht		

Signed _____ Givers

Date _____

Signed _____ Receivers

Date _____