



บริษัท ทีทีซีแอล จำกัด (มหาชน)
TTCL PUBLIC COMPANY LIMITED

COMPANY REGISTRATION NO. 0107551000185 (HEAD OFFICE)
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**Anti-corruption Guidelines
(Amendment dated on August 15, 2022)**

In order to clarify procedures in subjects at risk of corruption, Board of Directors, the Management Team and employees at all levels and TTCL group must act with cautiousness when dealing with the following matters.

1. Political Contributions

Political Contributions mean providing financial or other forms of support to any person involved in political activities, politicians, political parties, political groups or encouraging employees to participate in political activities on behalf of the company to obtain special privileges, undue benefits, business advantage both in direct or indirect manners. This excludes the employees' legal support of democratic processes or involvement in political activities to the scope of personal liberty.

The company's anti-corruption guidelines are as follows:

- 1.1 The company maintains a position of political neutrality and refuses to provide political supports to any person involved in political activities, politicians, political parties, interest groups in all areas, regions at all levels by any mean.
- 1.2 Company Board of Directors, the Management Team and employees have rights to participate in political activities in alignment with the constitution, law and relevant regulation. However, the use of rights must not be done in the name as TTCL's Board of Directors, the Management Team and employees. The use of company's property, equipment, resources directly or indirectly are not allowed.

2. Corporate Philanthropy or Public Charity

Corporate philanthropy or public charity may place the company at corruption risk. Since donation activities involve spending the company's funds without constructive returns, such could be misused as means of corruption.

To avoid misuse of corporate funds for corporate philanthropy or public charity; the company's policy, monitoring and control procedures regarding corporate philanthropy or public charity are as follows;

- 2.1 Donations must be made transparent, legal, and must not be activities that contrary to good morals, or have negative impact on the society.
- 2.2 Donations must not be made in an exchange for any personal or organizational benefit. The company refuses to allow misuse of such charitable activities for purposes that lead to corruption.
- 2.3 Forms of charitable activity can be in cash such as donations for national disaster relief, or in-kind such as computers donation to support education.

- 2.4 Donations must be proved for its existence; that such activities are carried out for charitable purposes and public benefits. Aforementioned actions must be verifiable and successfully carried out to the benefits of the society and in conformance with the company's CSR objectives.
- 2.5 Donations must be reported in internal memorandum, indicating the recipient's name and the purpose of charitable contribution. All supporting documents must be submitted for the company's authorized person's approval.

3. Sponsorship

Sponsorship differs from corporate philanthropy or public charity. It is considered as a channel to promote the company's business, display its logo, build business reputation and reliability, and strengthen business relationships. Sponsorship can be a risk of corruption as it involves with cash payment or other benefit which are difficult to detect or evaluate, and can be related to bribery.

The Company's policy, monitoring and control procedures for granting sponsorship are as follows;

- 3.1 Sponsorships must be granted transparent, legal, and must not be activities that contrary to good morals, or have negative impact on the society.
- 3.2 Sponsorships must be verifiable and must not be made in an exchange for any personal or organizational benefit. The company refuses to allow misuse of sponsorships for purposes that lead to corruption.
- 3.3 Forms of sponsorship granted both in cash or in-kind which can be converted into cash such as food and accommodation or equipment.
- 3.4 Sponsorship projects must be verifiable. The individual soliciting sponsorships must carry out activities in accordance with the planned project. This is to ensure that the genuine purpose of any grant is completed successfully to benefit the society and that it is in conformance with the company's CSR objectives.
- 3.5 Sponsorships must be made with internal memorandum, indicating the recipient's name and the purpose of sponsorship. All supporting documents must be submitted for the authorized persons' approval.

4. Giving and Receiving Gifts, Hospitality, and Other Benefits

The company recognizes that fostering positive relationship with business partners is the key to its ongoing success. Board of Directors, the Management Team, and employees are permitted to offer and accept gifts, hospitality, and other benefits to/ from any person or any organization. However, all conducts must conform to the following regulations;

- 4.1 Giving and/or receiving shall be with a value not exceeding 3,000 Baht
- 4.2 Giving and/or receiving must be revealed.
- 4.3 Give and receive in the company's name, not in the employee's name
- 4.4 Give and receive without the intention to influence, induce or reward any person or organization to gain improper business advantage or undue exchange for favors or benefits.

- 4.5 Give and receive only goods, not cash or cash equivalent such as gift certificate, gift voucher.
- 4.6 Give and receive in accordance with the company's regulations and not violating to the law.
- 4.7 Give and receive in appropriate circumstances. For instance, it is customary to exchange gifts during special occasions; such as New Year, Chinese New Year and Thai New Year (Songkran). Also, it is a proper etiquette to arrange welcoming celebrations for certain individuals in consideration of their positions and duties.
- 4.8 Give and receive in appropriate timing. For instance, Board of Directors, the Management Team, and employees must not give/ receive gifts, or other benefits to/ from any organization involved in the bidding of the company's tendering process.
- 4.9 Board of Directors, the Management Team, and employees are permitted to receive gifts under conditions provided in 4.1- 4.8 and/or in cases the aforesaid conditions are not complied, and the receipt of gifts cannot be denied, it must be reported to higher authorized person through the receipt of give report form as attached.
- 4.10 When Board of Directors, the Management Team and employees wish to offer gifts to partners or any organization, the internal memorandum, attached with relevant documents, must be submitted for the authorized persons' approval.

5 Entertainment & Hospitality

The expenditure for business hospitality such as hosting of meals or parties, sports entertainment, and other expenditures directly related to business operations, or trade customs, as well as business training are able to do, but it does not affect the decision-making in the operation of the party who takes the entertainment & hospitality and/or causing a conflict of interest between the Company and related parties.

6 Company and Business Related Persons

- 6.1 Subsidiaries and Affiliated companies which the company has control power.
 - The company will inform and support its subsidiary and affiliated companies to participate in all anti-corruption measures.
- 6.2 Agents and other intermediaries
 - Board of Directors, the Management Team and employees are prohibited to employ agents or any kind of business intermediaries for the purpose of committing acts of bribery or corruption.
- 6.3 Supplier/ service provider, and contractors
 - The company will conduct the procurement of goods and services in a fair and transparent manner and will act with due care when evaluating prospective suppliers, service providers, and contractors. The company shall inform the suppliers and contractors of its anti-corruption policy. TTCL reserves the right to terminate a relationship if it is discovered that the other party has paid bribes or acted corruptly.



If there is any query or comments, please contact Company Secretary Unit at Tel. no. 02 260 8505 or Email: internal_audit@ttcl.com

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(Mr. Hironobu Iriya)
President & CEO