

TCM Corporation Public Company Limited Anti-Corruption Policy

TCM Corporation Public Company Limited (“The Company”) realises the importance of the good corporate governance policy and business ethics, conducting business with integrity, transparency, fairness, responsibility, and caution under the law, rules and regulations, and relevant standards. The Company must avoid any activities that might lead to an actual or perceived conflict of interest between personal interests and the interests of the Company.

The Company underlines the significance of measures against all forms of corruption. The Company has been a member of the “Thailand’s Private Sector Collective Action Coalition Against Corruption” to assure the intent of the Anti-Corruption Policy. In addition, the Company has laid down various policies, guidelines, and regulations on anti-corruption in accordance with business operations. Importantly, the Company has defined the written “Anti-Corruption Policy” in order to promote an understanding of anti-corruption practices for everyone in the organisation and encourage them to comply with the policy in the same direction to drive the business towards the sustainable development goals.

Definition according to the Anti-Corruption Policy

Corruption refers to any forms of bribery, whether in the form of offering, promising to give, giving, agreeing to give, soliciting, or accepting money, assets, or any other inappropriate benefits to or from government officials, government agencies, private agencies, or duty-bound persons either directly or indirectly in order for such persons to act or refrain from performing the duties to obtain or retain business or recommend a specific business to the Company, or obtain or retain other undue business advantages, unless stated otherwise by law, rules, notifications, regulations, local traditions, or trading norms.

Anti-Corruption Policy

The directors, executives, and employees of the Company at all levels are prohibited from engaging in or accepting any form of corruption, either directly or indirectly. This policy shall be applied to all businesses in every country and all agencies involved. The compliance with the policy shall be regularly reviewed at least annually or when any significant changes occur. In addition, relevant operational guidelines and requirements shall be revised to ensure alignment with changing business circumstances, rules and regulations, and other legal requirements.

Duties and Responsibilities

Each committee has the following responsibilities:

1) The Board of Directors shall be responsible for determining the Anti-Corruption Policy and overseeing effective anti-corruption systems to ensure that the management team realises the significance of anti-corruption practices and cultivates the anti-corruption mindset as part of the corporate culture.

2) The Audit Committee shall be responsible for reviewing financial and accounting reporting systems, internal control systems, internal audit systems, and risk management systems to ensure their compliance with the Anti-Corruption Policy and guidelines in accordance with international standards.

3) The Executive Committee and Management Team shall be responsible for the implementation of the Anti-Corruption Policy. In addition, they are required to supervise the communication of the policy to ensure that all employees and related parties are encouraged to effectively apply these guidelines to the whole organisation. Furthermore, they are in charge of reviewing the suitability of relevant systems and measures to ensure alignment with changing business circumstances, rules and regulations, and other legal requirements.

4) The Internal Audit Unit shall be responsible for auditing and reviewing business operations to ensure their compliance with policies, good practices, guidelines, procedures and authority, Securities and Exchange Law, and other relevant laws. In addition, it is essential to ensure that the Company has carried out the internal control system that is appropriate and sufficient to minimise the risk of corruption that may occur, and report to the Audit Committee.

5) The Risk Management Committee shall be responsible for corruption risk assessment to consistently summarise the risk of corruption that may arise in each process. They shall also propose clear and appropriate preventive measures against corruption and present reports to the Executive Committee and the Board of Directors, respectively.

Anti-Corruption Guidelines

1) Directors, executives, and employees at all levels of the Company shall comply with the Anti-Corruption Policy and the Company's Code of Conduct and avoid either direct or indirect involvement in any form of corruption. They shall not demand or accept corruption for the benefits of the Company, themselves, their families, friends, or acquaintances, either directly or indirectly.

2) Directors, executives, and employees at all levels of the Company shall not neglect to take action when witnessing an act that can be construed as corruption in the Company. It is mandatory that they shall notify the supervisor or the person in charge of such incident and provide full cooperation in the fact-finding investigation. If having any questions or inquiries, they are required to consult with the supervisor or the person in charge of receiving information from whistleblowers or complainants through the specified channels.

3) The Company shall provide fairness and whistleblowing protection for the employees who report corruption related to the Company. The whistleblower protection measures shall be implemented to protect the complainant or those who cooperate in reporting corruption as specified by the Company under the whistleblowing or complaint regulations and guidelines as stated in the Corporate Governance Code.

4) Directors, executives, and employees at all levels of the Company who commit corruption shall be subject to disciplinary action in compliance with the Company's regulations, which may ultimately lead to criminal proceedings if appropriate.

5) The Company realises the importance of knowledge sharing and the promotion of understanding for those who have to perform the duties related to the Company or may affect the Company in regard to this Anti-Corruption Policy.

6) The whistleblowers and complainants can send their information to the Company through following channels:

- a) Report to the Chief Executive Officer through the Company Secretary at comsec@tcm-corporation.com
- b) In the case of reporting any clues or complaints related to a director, inform the audit committee at:
 - Chairman of Audit Committee
 - TCM Corporation Public Company Limited
 - 2054 New-Petchburi Road, Bangkapi Sub-district, Huaykwang District, Bangkok 10310
 - E-mail: auditcom@tcm-corporation.com

Rules of Practice

1) The current and future rules of practice formulated by the Company shall be applied to any operations in accordance with the Anti-Corruption Policy. Notably, the Anti-Corruption Policy shall be strictly implemented.

2) This Anti-Corruption Policy shall be applied to human resource management, including nomination or recruitment, promotion, training, performance evaluation, and remuneration. The Company shall protect the employees who refuse corruption, or notify or report corruption incidents, or make a statement against corruption from demotion, punishment, termination, or any negative consequences even though the Company may lose a business opportunity. In addition, the supervisors at all levels are required to communicate the policy to all employees and ensure that they can understand and apply it to business activities within their scope of responsibility along with policy monitoring and evaluation for effective implementation of the policy.

3) The Company has established a regulation for disbursement by specifying disbursement limits, approval authorisation, objectives, and recipients, all of which require clear documentation and supporting evidence in order to prevent corruption along with the audit process from the internal audit unit.

4) The Company has regularly conducted sales and marketing audit, including procurement and contracting audit to mitigate the risk of corruption in compliance with the disbursement and procurement regulations.

5) The Company has arranged an internal audit to ensure that the internal control system can help the Company achieve its goals. The audit includes a thorough review of the operations of all departments to comply with the regulations. In addition, the internal audit provides assistance to identify material deficiencies and weaknesses together with recommendations on the development of the operating system to be more efficient and effective in accordance with the good corporate governance guidelines.

6) For clarity in conducting activities that are subject to a high risk of corruption, the directors, executives, and employees of the Company at all levels must act with caution. All activities must be transparent and lawful. Therefore, the Company has set policies and operating guidelines for the following areas:

- 6.1) Political neutrality and assistance: The Company has a policy of political neutrality that refrains from providing financial support or any resources or actions that benefit any politician or political party either directly or indirectly. The Company shall not participate

in any political election campaign or advertising for any political party or politician in the Company's area.

- 6.2) Receiving and giving gifts or any other benefits: The Company's policy states that "Receiving and giving gifts or any other benefits must be in accordance with the appropriateness of tradition. It should not fail to perform duties which may lead to corruption issues, and it must not exceed 3,000 baht.

If a gift cannot be rejected and a gift worth more than 3,000 baht must be accepted, the gift must be delivered to the Human Resources Department along with a gift report in order to use the gift as a benefit of employee reward or charitable donation in the name of the company in the future, depending on the opportunity and appropriateness."

- 6.3) Reception: The Company sets policy that "Reception can only be done if it is customary or festive, according to the company policy. It must not be done to induce any action or omission, or to obtain a favor or benefit covertly, and the reception must be of reasonable value."
- 6.4) Charitable donations: The Company has determined a policy stating that "all corporate charitable donations shall be proven that such donations would help support the social community by providing clearly documented evidence to ensure that the donations would not pave the way for corruption."
- 6.5) Sponsorships: The Company's policy determines that "the offering of sponsorships shall be proven that such sponsorships would support the success of the project's activities, advertise or promote business, or comply with the objectives of the operation with transparency, lawfulness, and certainty that sponsorships would not be used as an excuse for bribery."
- 6.6) Business relations and procurement: The Company has established a policy stating that "it is strictly prohibited to offer or accept a bribe in any form of business operation. The Company's operations and services in partnership with government agencies must adhere to the Company's procurement policy and procedures with transparency, integrity, and compliance with relevant laws and regulations."

7) Employees will be trained in anti-corruption policies and practices, and this policy will be communicated and disseminated during new directors, executives, and employee orientation.

8) The company will communicate this policy to representatives, agents, customers, suppliers, or business partners who have business relationships with the company or its subsidiaries and join to comply with this policy or support the company's anti-corruption efforts.

This document is effective from May 30, 2019 onwards.

By the resolution of the Board of Directors No.3/2019 on May 30, 2019

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(Mr.Pimol Srivikorn)

Chairman