

Translation

Anti-Corruption Policy

TEKA Construction Public Company Limited (“**The Company**”) realizes that corruption is an act that is wrong and unfair in business operations, which will cause damage and hinder social development and the country's economy. Corruption is not accepted from both within the country and abroad, so to ensure that the Company have a policy to define responsibility, guidelines and appropriate actions to prevent corruption in all forms of business activities whether directly or indirectly, the Company has established an anti-corruption policy as a clear guideline in business operations. The details are as follows:

1. Glossary of Terms

- 1.1 “**Corruption**” means the act or omission of performance in the duty of position, or the abuse of power in the duty of position as well as violation of laws, ethics, regulations or the Company's policies for the purpose of unjust exploitation, in various forms such as requesting, accepting, offering or giving assets, including any other benefits with government officials or any other person doing business with the Company, bribery of any form by offering, making a promise, giving, receiving or claiming a benefit as an incentive (for example, money, gifts, loans, rewards, compensation, hospitality or other benefits) for a person to do something illegal or in contrary to good morals, as well as the use of powers acquired by the position and/or the use of information obtained from the performance of the Company's work to do any action that is beneficial to oneself and/or others in order to obtain money, assets, or any other benefit that is not appropriate for business or any benefits that should not be for oneself and/or others, both directly and indirectly including any actions in contrary to or inconsistent with ethical principles, except in the case of laws, regulations, announcements, regulations, local customs or trade customs.
- 1.2 “**Bribery**” means any properties or any other benefits proposed to give, promised to give, given as well as accepting or requesting something which affects the judgment in a manner that induces or not induces the act in contrary with the law or responsibilities.
- 1.3 “**Charity donation**” means making donation of money, things or any other benefit for public benefit by ensuring that the donation will not be used for reciprocity or bribery.
- 1.4 “**Gift**” means any items of monetary value, such as cash substitutions, items used in exchange for goods or services, such as reward coupon, discount coupon, etc.

1.5 “**Hospitality**” means any expenses related to food and beverages, show/sports fees, including travel expenses such as airfare, transportation costs and accommodation costs, etc.

1.6 “**Sponsorships**” means money paid to or received from customers, trade partners, and business partners on a reasonable basis, with the objective to support the business operations, brand, or reputation of the Company. Sponsorship is useful for building trust in trading which helps strengthen the business relationship and is suitable for the opportunities.

2. Duties and Responsibilities

2.1 The Board of Directors is responsible for considering and approving policies, including establishing an effective and appropriate anti-corruption support system suitable for the business and the environment of the Company, so that all employees of the Company understand and realize the importance of anti-corruption and instilling as an organizational culture.

2.2 The Audit Committee is responsible for reviewing financial and accounting reports, internal control system, internal audit system and risk management system which linked to potential fraud risks, to ensure that the operations of the Company are concise, appropriate and efficient, in compliance with generally accepted accounting standards as well as supervising the policy and anti-corruption measures to ensure that the Company has performed its duties according to the law and set ethics, including receiving clues regarding corruption, considering the fact-checking and propose the matter to the Board of Directors for a joint consideration to punish or solve such problems.

2.3 The Chief Executive Officer and executives are responsible for implementing the anti-corruption policy by establishing a system to support anti-corruption policy and communicating to employees and all related parties, including reviewing the suitability of various systems and measures to comply with changes in business, rules, regulations and legal requirements.

2.4 Internal auditors are responsible for auditing and reviewing the operation to ensure that it is in accordance with policies, guidelines, and practices, authority power, regulations, laws and requirements of relevant agencies to ensure that there is a control system suitable and sufficient against the risks of corruption that may occur and report to the Audit Committee.

2.5 Personnel are required to perform their duties in accordance with this policy. In case of doubt or seeing a violation of this policy, personnel must report to the supervisor or through the reporting channels specified in the whistleblowing policy or complaints of the Company

3. Guidelines

The Board of Directors, sub-committees, executives and all employees of the Company must strictly comply with the anti-corruption policy, and must not be involved with any form of corruption directly or indirectly. The guidelines are as follows:

3.1 General Practice

- (1) The Company has communicated to personnel, both executives and employees, that the Company's employees at all levels are required to comply with the anti-corruption policy, the Code of Conduct and the Code of Ethics by not getting involved in corruption matters, whether directly or indirectly.
- (2) Executives, employees and personnel of the Company must not neglect or ignore when seeing an action that is considered to be a corruption related to the Company. Everyone must notify the supervisors or person in charge for acknowledgment, and cooperate with the investigation of various facts. If any questions or concerns may arise, all must consult the supervisors, or a person designated to be responsible for monitoring compliance with the Company's Code of Conduct through various channels as specified in order to cooperate and look after the interests of the Company more thoroughly and efficiently.
- (3) The Company will provide fairness and protection to personnel who deny or report the corruption related to the Company by using measures to protect complainants or those who cooperate in reporting corruption as stipulated in the whistleblowing policy by providing documents to keep the confidentiality of the whistleblower's information and impose penalties on officials responsible for such information when the information is disclosed. Access to such documents must be permitted only by authorized personnel.
- (4) Corruption is considered as a violation of the Company's Code of Conduct, in which the offender must be considered for disciplinary actions in accordance with the regulations set by the Company, in case the offense is illegal.
- (5) The Company realizes the importance of disseminating, educating and understanding the individual persons who have to perform their duties related to the Company, or may affect the Company by the matters that must be complied with this anti-corruption policy.
- (6) The Company arranges an internal audit to ensure that the internal control system helps the Company achieve the laid out goals, including auditing the operations of all units to meet the requirements, rules and regulations, and helping to find flaws, weaknesses, as

well as giving advice on how to develop an efficient and effective operating system according to corporate governance guidelines and this anti-corruption policy.

- (7) This anti-corruption policy is a part of the disciplines which the Board of Directors, sub-committees, executives and employees of the Company. If anyone ignore, omit and intent not to comply with this policy, it will be considered as a disciplinary offense and will be considered for penalty according to the Company's regulations and may be subject to legal penalties if the act violates the provisions of the law.

3.2 Specific Action Guidelines

In order to have clarity when operating in matters that have a high risk of corruption, the Company's employees at all levels must act with caution in the matters that are defined as follows:

3.2.1 Political Assistance

- (1) The Company is a politically neutral business organization, supporting the compliance with laws and democratic governance. The Company does not have any guidelines to provide political assistance to any political party, whether directly or indirectly, with the objective to provide business benefits to the Company.
- (2) The directors, sub-committees, executives or employees have political rights and liberties under the law, but shall not take any actions that makes the Company to lose impartiality or receive damage from political involvement.
- (3) The directors, sub-committees, executives or employees shall not engage in political activities within the Company, including using any resources of the Company to do so.

3.2.2 Charity Donation

For charitable contributions, donations and aid grants, the Company supports community and social development for the improvement of quality of life, building the economy and strengthening the community and society through business processes or charitable donations. However, charitable contributions may pose a risk to the Company because such activities involve spending money without tangible rewards and may be used as an excuse or a path for corruption. In order not to make charitable donations with hidden objectives, the Company has established policies and criteria for charitable donations, review process and the details of the control as follows:

- (1) The donation must be able to prove that there is actually a project activity for that charity, actions are taken to support the achievement of the project objectives, and bring real benefits to society or for the purposes of Corporate Social Responsibility: (CSR) with clear documentary evidence and in accordance with the Company's regulations.
- (2) The donation must be able prove that it is for charity and has nothing to do with any other person's reciprocal interest or any agencies, except for the announcement of honors according to general customs, such as the affixing of the logo, the announcement of the names of the Companies at the venue of the event, or in the media for public relations, etc.
- (3) Donations must have a donation record which specify the name of the institutions, organization or individual recipient of the donation and the purpose of the donation along with all supporting documents as well as proposing to the authorized person of the Company to consider and approve according to the Company's approval authority.

3.2.3 Sponsorships

Sponsorships is one of the means for publicizing the Company's business. Unlike charitable donations, this may be done for the purpose of the Company's business, brand or reputation with a risk because it is a payment for a service or benefit that is difficult to measure and monitor. Sponsorships may also be linked to bribery, therefore the Company has established policies, guidelines, review process and the details of the control regarding sponsorships as follows:

- (1) The sponsorship must be able to prove that the receiver has actually undertaken the activities of the prove, and it is an action to support the achievement of the project objectives as well as bring real benefits to society or to meet the objectives of operating with social responsibility.
- (2) The sponsorship must be able to prove that the sponsorship or any other measurable benefits, such as accommodation and meals, have nothing to do with reciprocal benefits to any person, or any agencies, except for the announcement of honor according to general business customs.
- (3) As a sponsor, a memorandum of request must be prepared which specify the name of the grantee and the purpose of the sponsorship along with all supporting documents , and

propose to the authorized person of the Company to consider and approve according to the Company's approval authority.

- (4) The Company must exercise caution in providing financial support either from request, advice or recommendation of government officials or business partners because such contributions may be considered as an indirect bribe, in order to obtain or maintain the business contract, government authorization or business advantage.

3.2.4 Gifts, Hospitality and Other Expenses

The Company recognizes that building good relationships with business partners is essential to the Company's continuous success. Employees can give or receive gifts and/or hospitality and/or in the form of other expenses to/from any person if all meet the following conditions:

- (1) It is not an intentional act to dominate, induce or reward any person to gain any advantage through improper action or as an explicit or covert exchange in order to obtain assistance or benefits.
- (2) It is not in contrary with the laws, regulations and in accordance with good corporate governance and the Company's policy in related matters.
- (3) It is given in the name of the Company and not on behalf of the employee.
- (4) It is not a gift that is in the form of cash or cash equivalents (such as gift card or voucher).
- (5) It is suitable for situations such as giving small gifts during Songkran, Chinese New Year or New Year Festival which is a normal custom.
- (6) The type and value are appropriate, and delivered in a timely manner. For example, in the event that the group of companies are in the process of holding a tender, employees must not accept gifts or hospitality from the companies participating in that tender.
- (7) It is given in an open manner, not concealed.

However, employees can accept gifts with a value less than 3,000 baht. In the event that they cannot refuse and must accept gifts of more than 3,000 baht, they must notify their supervisors using the gift receipt form, and deliver the said gift to the Secretary of the Chief Executive Officer to be used as a reward for employees or donate to charity as appropriate.

4. Reporting Matters Related to Bribery and Corruption

All employees of the Company have a responsibility to assist in the investigation, prevention and reporting in the event of occurrence or suspicion of bribery and corruption related to the Company. If employees see actions that are considered bribery and corruption related to the Company, employees must report to the supervisor without delay or report through the reporting channels as specified in the whistleblowing policy.

In addition, the Company discloses information to related persons and various groups of stakeholders through the annual report (form 56-2) on the Company's website or other methods as appropriate to ensure that the Company has transparent and verifiable anti-corruption measures.

5. Protection Measures

The Company will be fair and protect employees who report or give clues about the bribery and corruption related to the Company, including employees who reject bribery and corruption by using measures to protect complainants or those who cooperate in reporting corruption as stipulated in the Whistleblowing policy.

6. Punishment Process

Employees who violate this policy shall be subject to disciplinary actions up to dismissal, as well as may be punishable by law if the act is illegal. This cannot be used as an excuse for non-compliance.

The Company reserves the right to review the contract or terminate the contractual relationship with customers, partners or other stakeholders in the event that it is found to be involved in or commits an offense contrary to this policy.

Approved by the resolution of the Board of Directors Meeting No. 4/2019 held on 9 August 2019.

This policy shall come into effect from 9 August 2019 onwards.

Signature

(Mr. Vithool Jearkjirm)

Chairman of the Board of Directors

TEKA Construction Public Company Limited