



# Anti Bribery and Corruption Policy

Regulatory Compliance Department  
Compliance and Legal Management Group

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## Anti Bribery and Corruption Policy

### 1. Principle

The bank is determined to perform business with honesty, good faith, non-violence, straightforward along with the principle of anti-corruption of all types. Receiving and giving bribery and corruption is illegal and the bank will not accept such incident and take it as a Zero Tolerance, and it will be following The Code of Conduct of the bank.

This policy will be supplement of the Code of Conduct. It shall be determined the procedure of the bank in Anti Bribery and Corruption, notwithstanding the bank shall comply relevant Law with the Anti Bribery and Corruption in Thailand and other countries that the bank performs their business.

### 2. Definition

No.	Statement	Definition
1	Bribery	Properties or other benefits which were presented to give, promise to give, deliver, accept such giving or request something that may affect to the judgment, in the manner of doing or not doing, which against the Law or their responsibilities.
2	Corruption	Corruption by using or relying on position and job, power or influence for their own benefits and/or third person, including, discriminate against someone, nepotism, taking bribes and other injustice which was used as a tool to derogate justice and social legality.
3	Properties	Things and incorporeal objects, susceptible of having a value and of being appropriated such as money, houses and cars.
4	Other Benefits	Such as allowing to stay in rental place without cost, giving release the obligation, taking to a trip or giving an offer.
5	Bank Personnel	Committees, executives, all personnel and bank employees.
6	Government Officers	Government officers, overseas government officers and international organization officers according to organic law on counter corruption.
7	Bank Affiliates	Company or juristic partnership in associated company under Section 39 of Revenue Code.

### 3. Applicable Scope

3.1 This policy enforces the bank and bank's personnel.

3.2 This policy enforces bank affiliates, each company in bank affiliates will take this policy to be considered, and promulgate it as prescribed procedures.

3.3 This policy enforces business partners, representatives, agents, counselors or related persons in other business of the bank, or act on behalf of the bank, by taking it to apply with such person as in this policy, and performing it until it will be done, as appropriate, and adhere to the accountability standard to society as it performed by the bank.

#### **4. Related or Responsible Person**

4.1 The bank commission is the one who permit this policy.

4.2 Committees and Executives are responsible for controlling, supporting and motivating to perform this policy, both intensively and continuously, to protect the receiving and giving bribes and corruption which may arise from the business procedure of the bank or other related procedures of the bank, including, giving and supporting the procedure of anti-receiving or giving bribery and corruption to the bank affiliates, business partners, representatives, agents, counselors or related persons in other business of the bank, or act on behalf of the bank.

4.3 All executives have responsible for ensuring that their own subordinates will realize and comprehend in this policy by taking sufficient and constant training, and perform their duty as a model to personnel, in the anti-receiving or giving bribery and corruption.

4.4 Bank personnel will study and perform their duty in conforming to this policy, in the case when there is suspicion or experience of disobeying this policy, there shall be reported director or through the channel of report as prescribed.

4.5 The representatives committees of the bank, who were appointed to act as the committees of the company in the bank affiliates, having the power to associate with the company in the bank affiliates for having same standardization of the bank.

4.6 The person, who is business partners, representatives, agents, counselors or related persons in other business of the bank, or act on behalf of the bank, be treated in conforming to this policy by the bank, from the starting point of business relationship to the future as appropriate, and such person will cooperate to monitor status or give promise of anti-receiving or giving bribery and corruption.

#### **5. The Process of the Anti Bribery and Corruption**

5.1 Bank personnel and the bank affiliates will follow this policy without relating to receive or give bribery and corruption, either direct or indirect.

5.2 Bank personnel and the bank affiliates will not request, provide or receive bribery for their own or the bank benefits, or benefit for the person, who related to the bank or related to such person, such as person in family, friends or related persons in other manner.

5.3 Bank personnel and the bank affiliates will not offer to give, promise to give or deliver bribery to the government official or other private sector official, for persuading to do, not to do any act or to delay the doing of any act contrary to one's own duty or law.

5.4 After any person experiencing an act which is within the scope of receiving or giving bribery and corruption, such person will inform director of related institute or channel of Whistle Blowing immediately.

5.5 The bank shall realize fairness, protect, not demote, punish or give negative effect to the personnel, who denied to receive or give bribery and corruption, even though, such performing will be the chance to make the bank losing their business opportunity.

5.6 For business relationship and procurement, there shall be no receive or give bribery in performing business and all types of procurement. Performing business and business communication of the bank will perform with transparency, honesty, accountability and being under the law and rules of performing related business.

5.7 Any procedures under this policy will be followed the practical guideline as prescribed in Business Code of Conduct, Good Corporate Governance Policy, including regulations and related Operation Manual of the bank and any other process which prescribed, as appropriate, by the bank according to this policy.

## **6. Precautionary Actions in the Case when there is High-Risk Opportunity of Bribery**

The following actions are high-risk actions of bribery which need a precaution and follow the related law, rules and regulations strictly.

### **6.1 Facilitation Payment**

Facilitation Payment means small amount of money that paying to government officer unofficially which giver has no intention to pay such money to officer to do, not to do any act or to delay the doing of any act contrary to one's own duty, but it is for ensuring that government officer will perform his/her process or encourage them to make the process quicker, and such process is not rely on government officer's discretion and it is legal act of such government officer, and its right will be performed under applicable law such as request for license, request for certificate and getting public service.

The bank has no policy to give support to facilitation payment. However, legally express process is acceptable on condition that such process opens for all persons or follows scope of law of some countries.

### **6.2 Hospitality Expenditures and Gifts**

Hospitality Expenditures and Gifts are payment for proceedings by juristic person to make a good relationship or may be expression of social etiquette which such Gifts will be in various formats such as money, goods, services and gift vouchers. Hospitality Expenditures may include accommodation fees or fares for visiting the place of business or field trip, food and beverage cost.

The bank has no intention to make payment of Hospitality Expenditures and Gifts for motivating government officer to perform illegal duty action and for bribery. Therefore, value or price of Hospitality Expenditures and Gifts will reflect reasonability and necessary payment, tradition, culture or social etiquette, notwithstanding, Hospitality Expenditures and Gifts payment will be approved and follow related regulations of the bank, and also record the actual payment with receipt.

### **6.3 Charitable Donations and Donations to Political Parties**

Charitable Donations is the part of corporate culture of the bank to support community but Charitable Donations may be the method of bribery, thereupon such Charitable Donations shall be approved as prescribed by the bank with transparency includes clarifying the purpose of donation, and there is no any donation that will perform for covering the bribery.

Donations to support political parties may motivate persons holding political positions, who are government officers, to perform illegal duty action. The bank has no policy to take funds or properties of the bank for supporting candidates of political activities.

## **7. Withdrawal and Bookkeeping**

7.1 Withdrawal of any activities shall be withdrawn in actual payment, with evidence which can prove, record with the actual time, and if any, there is any expense must be approved, it shall be followed and validated of the bank procedure as prescribed.

7.2 Expenses arise from any transactions shall be bookkeeping which can be corrected, completed, inspected and verified constantly for being conform and follow bank regulations and Financial Reporting Standard.

7.3 The bank will not allow making false and incomplete record, unconventional principle, window dressing including off-the-book record because expenses which recording off-the-book always be tools of illegal purpose such as bribery.

## **8. Policy Violations**

8.1 The bank will take disciplinary action against bank personnel, who violates to perform under this policy, including direct director who neglects offence or being aware of such offence without dealing with it, and if such policy violations is corruption on their own duty, or intentionally commit a crime, such person will be punished with dismissing, discharging or laying off from their position, depends on severity of such incidents.

8.2 In the case where business partners, representatives, agents, counselors or related persons in other business of the bank, or act on behalf of the bank, having no receiving and giving bribery and corruption policy, the bank shall categorize such persons to be in the high-risk group, and intensely perform Customer Due Diligence prior to joining business.

## **9. Governance, Monitoring and Verifying**

9.1 The bank shall provide inspection and evaluating appropriate internal control policy of Anti Bribery and Corruption.

9.2 The bank shall provide reviewing and rectifying this policy as appropriate, or at least every year, if any, there is any amending of significant factors such as law or related Standard of Business Conduct amendment.