



**UBIS (ASIA) PUBLIC COMPANY LIMITED**

## **Anti-Corruption Policy**

(Approved from the Board of Directors Meeting No.12/2020 dated November 11, 2020)

## **Anti-Corruption Policy**

The company does not accept all kinds of corruption covering all business and items in all countries and all related units. Meanwhile, the company sets the operational steps for anti-corruption in order to comply with this policy and the company will review such operational steps regularly to correspond with the change of business law and maintain the reputation of the company, directors, management, and all staff have to adhere to this policy.

### **Definition according to anti-corruption policy**

Corruption means the action to seek illegal benefits by duties or by legal to serve their benefits, friends and/or others by proposing, promising, requesting, demanding, giving or bribery, diverting into illegal acts directly and indirectly, making false document, taking company's assets for personal use, conflict of interest action.

Political assistance means financial assistance or other forms of assistance to support political activities, financial assistance such as loan, donation, other forms of assistance such as giving or service, advertising support political party, buying concert ticket for funding or donation to political party, allowing staff to take a day off or to be company's representative to join political campaign.

### **Procedure to comply according to anti-corruption policy**

1. Director, management and staff of company do not accept or support all kinds of corruption directly and indirectly.
2. The company defines the operational procedure in activities that cause the risk of corruption to director, management, and all staff to comply as follows :
  - 2.1. The company has no policy to support any Political assistance. In case of any expenses found to be related to support Political assistance, it will be rejected.
  - 2.2. Donation for charity has the objective to develop social, economic, culture and educational activities that must be transparent, legally, not be used for corruption and comply with the regulation on donation for charity of the company.
  - 2.3. Financial assistance has the objective to build company's reputation, tighten business relation to be transparent, legally, not to be used for corruption and comply with the regulation on financial assistance of the company.
  - 2.4. Directors, management and staff do not ask, request and give any objects or benefits to the person who is responsible related to the company except such giving or obtaining is by local tradition or trade tradition with the value not exceeding that specified by the company and to comply with the regulation of giving or obtaining gifts and business entertainment.

- 2.5. The company does not pay and obtain the fee of bribery in business operation directly or arising via persons on behalf of company, consultant, broker, contract party, partner, or intermediary under the company's control directly.
  - 2.6. Procurement has to be transparent, with integrity, abide by the law, governmental regulation and procurement regulation of the company.
  - 2.7. Outside Commission for company's distributor/agent or consultant must be clearly specified in the official distributor/agency or consultant contract.
3. Implementing anti-corruption policy into practice
- 3.1. To communicate policy and operational procedure related to anti-corruption to director, management, staff, person on behalf of company, consultant, broker, contract party, partner, in order to take into practice via specified channels.
  - 3.2. To arrange the process in financial report preparation to be transparent and correct including arranging suitable internal control system that is effective to prevent inappropriate action.
  - 3.3. To arrange personnel recruitment process, promotion, training, operational assessment to reflect the determination of company against anti-corruption measure.
  - 3.4. Do not demote, punish or give adverse consequence to staff that refuses corruption even such action causes the company to lose its business opportunity.
  - 3.5. The person who commits corruption is considered as unethical to the company and will be punished in discipline according to the regulation related to work specified by the company and may be punished in accordance with the law if such action is illegal.
  - 3.6. To arrange safe and accessible channels for staff and other persons to seek recommendation related to compliance to anti-corruption policy and to notify clues for the wrong-doing to ensure the informer will be suitable protected and prepare the person to check and follow-up all complaint issues.

General   
(Terdsak Marrome)

Chairman

24/11/2020