

10.5 Corruption Involvement Prevention

Policy

The Anti-Corruption Policy was approved in the 3/2015 Resolution of the Board of Directors on 12 March 2015 as follows:

The company is determined to operate its business morally and adhere to corporate social responsibility and responsibility to every stakeholder group based on good corporate governance principles. Therefore, to ensure the company has policies specifying responsibilities, practice guidelines and specifications for appropriate operations to prevent corruption in every activity of the company in addition to having fair, transparent and accountable business operations, the company has prepared this written Anti-Corruption Policy as a practice guideline for transparent and sustainable operations by the organization as part of business operations.

The company has set the following practice guidelines in line with the Anti-Corruption Policy:

1. The Board of Directors, executives and employees at every level are required to comply with the Anti-Corruption Policy by being neither directly nor indirectly involved in matters of corruption.
2. Anti-corruption measures are considered part of business operations and a duty and responsibility of the Board of Directors, executives, supervisors and employees at every level to render opinions related to practices to ensure that anti-corruption operations succeed in line with appropriate policies in addition to reviewing practice guidelines and specifications for operations to be concurrent with changes in business, rules, regulations and specifications of the law.
3. The company developed anti-corruption measures to be consistent with associated laws including moral practices by arranging risk assessments in associated activities or corruption risk groups along with preparing practice guideline handbooks for associated persons.
4. The company does not perform or support bribery in any form. Every activity under the care of the company, including the control of donations to charity, donations to political parties, business gifts

and support for various activities are transparent without intentions to persuade government or private officials to perform inappropriate actions.

5. The company arranges proper internal control and regularly examines internal control to prevent improper practices among employees.
6. The company provides anti-corruption education for the Board of Directors, executives and employees to promote honesty and responsibility in duties and responsibilities along with relating to show the company's determination.
7. Employees are not to neglect or ignore corrupt actions involving the company. Employees must notify supervisors or the persons responsible and cooperate in various fact examinations. If there are any doubts or questions, employees are to consult with supervisors or persons assigned to perform duties and responsibilities related to monitoring ethical practices. Inaction or refusal to cooperate in investigations is considered a crime.
8. The company offers justice and protection for employees or outside persons who reported corruption related to the company.
9. Directors, executives and employees who carried out corrupt actions committed ethical crimes requiring consideration for the highest disciplinary action according to the company's regulations and may be punished by law if the aforementioned actions are illegal.
10. The company has the Audit Committee or consents for outside agencies to review the management report system and the risk management system to ensure systems are in compliance with international standards as deemed fitting and effective for the business.

Performance

The company and subsidiaries have company operations in compliance with policies for preventing involvement with corruption as follows:

1. Business Risk Assessment to Identify Operations by the Company or Subsidiaries with Risk for Involvement with Corruption

The Risk Management Committee arranged for business risk assessments by combining corruption risks with financial risks and has controlling measures by using Key Risk Indicators (KRI).

2. Practice Guideline Specifications to Control, Prevent and Monitor Corruption Risks

The company has a clearly specified and practical policy for reporting on suspected crimes to control, prevent and monitor corruption risks.

3. Employee Communication and Training to Provide Education on Anti-Corruption Policies and Practice Guidelines

The company has policy to combine with employee orientation handbooks to communicate anti-corruption policies and practice guidelines to employees along with notifying policies to employees via email and public relations boards.

4. Guidelines for Monitoring Assessment of Practices under the Anti-Corruption Policy

The company has internal auditors plan internal audits in the aforementioned topic before making presentations to the Audit Committee and the Board of Directors to monitor the aforementioned assessments of practices according to the Anti-Corruption Policy.

5. Have the Audit Committee or An Auditor Approved by the Office to Review Completeness and Sufficiency of All Processes

Completeness and sufficiency of all processes are concurrent with auditor processes requiring Management Letter (ML) issuance to executives after audits or reviews and issuance of quarterly and annual financial statements for further presentation to the Audit Committee and the Board of Directors.