

Anti-Corruption Policy

Pylon Public Company Limited is committed to conducting business in an ethical and honest manner. To ensure that any form of bribery and corruption is prevented, the Company issued an Anti-Corruption Policy which was approved by the Board of Directors on the sixth Board Meeting of 2017 on December 19, 2017. The Anti-Corruption Policy, which applies to the Company's Subsidiary as well, prohibits all directors, executives and employees to be engaged in any form of bribery and corruption either directly or indirectly. The Policy must be strictly carried out by all staffs with regular review including periodical update of the Anti-Corruption Guidelines and Measures to comply with changes in the business, regulations and Thai laws relating to anti-bribery and corruption.

Anti-Corruption Guidelines

1. All directors, executives and employees must adhere to the Anti-Corruption Policy and Code of Conduct by not engaging in any bribery or corruption either directly or indirectly for the benefits of the Company, themselves, their families, friends and acquaintances.
2. Bribe giving to or receiving from governmental or private organizations to induce or influence an action or decision for one's advantage is prohibited whether it is direct or indirect, regardless of form.
3. Supporting any political parties or candidates is prohibited regardless of form.
4. Charitable contributions or money donations must be done with transparency and straightforward purpose and can be verified.
5. Receiving or giving of gifts, hospitality expense or other spending must be done in accordance with the Company's Authorities Chart with transparency and can be verified.
6. If employees need suggestion or clarification on the Anti-Corruption Policy, they should seek advice from their supervisors or human resources staffs.
7. It is every employee's duty to report to the person stated in whistleblowing and complaint-making channel if he/she suspects that there is an instance of bribery or corruption occurring, and to participate in an investigation of an incident reported.
8. The Company ensures that anyone who raises concerns will be protected in conformity with the Company Regulations, including no demotion, punishment or negative impact to the whistleblower as a result of refusing to engage in any corrupt activity.
9. Any director, executive or employee who does not comply with the Anti-Corruption Policy will be punished in accordance with the Company Disciplinary Action and Thai laws.
10. The Company recognizes the importance to publicize the Company's Anti-Corruption Policy to ensure that all directors, executives, employees, relevant parties and stakeholders are acknowledged and required to adhere to the policy.

Scope of Responsibility

1. The Board of Directors is responsible for considering and approving the Anti-Corruption Policy and monitoring to ensure that all directors, executives and employees efficiently comply with the policy until it becomes corporate culture.
2. The Audit and CG Committee is responsible for scrutinizing the policy, reviewing the Anti-Corruption Guidelines, giving suggestions in the making and reviewing of the policy and the guidelines and monitoring the compliance with the Measures and the relevant internal audits.
3. The Executive and Risk Management Committee is responsible for risk assessment and the Anti-Corruption Measures issuance including preparing, reviewing and revising to ensure that the Anti-Corruption Guidelines and Measures are up to date and proposing to the Audit and CG Committee and the Board of Directors for approval. The Executive and Risk

Management Committee must then announces and acknowledges the policy to all employees thoroughly.

4. The president and the executives are responsible for supporting and promoting the Anti-Corruption Policy, conducting business with integrity by avoiding any engagement in a bribery or corrupt activity or any unlawful act, and being role models of integrity for all employees and relevant parties.
5. The internal auditor is responsible for auditing and reviewing the compliance with the Anti-Corruption Policy in accordance with the Company's Authorities Chart, the Anti-Corruption Guidelines, the Measures and related laws to ensure that the Company adopts an adequate and appropriate internal control system against possible corruption risks and reporting to the Audit and CG Committee.

Please be informed accordingly.

The Anti-Corruption Policy applies to the Company and its Subsidiary.

As of December 19, 2017



(Mr.Seri Chintanaseri)

Chairman