



Pylon Public Company Limited

Anti-Corruption Policy

(Version as of 19 December 2017)

Anti-Corruption Policy

The Company is committed to preventing and combating all forms of corruption through direct and indirect means and to ensuring that any business activities with possible corruption risks are considered prudently. To this end, the Company established an “Anti-Corruption” policy in writing as approved by the resolution of the Board of Directors’ Meeting No. 6/2017 held on 19 December 2017. According to the policy, all directors, executives, and employees are prohibited from committing or accepting all forms of corruption through direct or indirect means. The policy extends to the business operations of the Company’s subsidiary which shall strictly comply with the policy. The compliance with this corruption policy, implementation guidelines, and operating requirements shall be regularly reviewed to ensure alignment with Thailand’s changing business and regulatory circumstances towards anti-corruption.

Implementation Guidelines

1. All directors, executives, and employees shall comply with the anti-corruption policy and the business code of conduct without involving in all forms of corruption through direct or indirect means for the benefit of oneself or one’s family, friends, or associates.
2. No bribes shall be given or received through either direct or indirect means regardless of whether in monetary or non-monetary forms, to or from persons, agencies, or government and private organizations, for such persons, agencies or organizations to perform or refrain from performing duties, or to obtain or maintain any undue interests.
3. All forms of political aid shall not be given.
4. Money donations for charity or financial support must be accompanied by clear objectives and according to the scope of authority with transparency and auditability.
5. Giving or receiving gifts, reception service fees, and other expenses must be according to the scope of authority and based on transparency and auditability.

6. If an employee is seeking advice or having any inquiries relating to anti-corruption measures, they shall consult their supervisors or the Human Resources Department.
7. It shall be the duty of all employees to provide whistleblowing reports to or file complaints with responsible persons through whistleblowing report or complaint filing channels should they detect any behavior with an indication of corruption, and to provide collaboration in the fact-finding process.
8. The Company shall protect a whistleblower or a complainant according to the stipulated guidelines. There shall be neither demotions, punishments, nor negative outcomes against employees who say no to corruption.
9. Directors, executives, and employees defying anti-corruption requirements of the Company shall be subject to disciplinary action according to the Company's regulations and directives, and shall be punished according to relevant laws.
10. The Company realizes the importance of communications and internal relations to promote knowledge and an understanding among its directors, executives, employees, and related persons, as well as the importance of external communications to the general public and stakeholders for their compliance with the anti-corruption policy.

Duties and Responsibilities

1. The Board of Directors shall have the duty to consider, approve, and determine an anti-corruption policy and to supervise the set-up of anti-corruption implementation guidelines in an efficient manner. This is to ensure that directors, executives, and employees attach importance to anti-corruption and embrace this norm as part of the corporate culture.
2. The Audit and Corporate Governance Committee shall have the duty to screen the anti-corruption policy and implementation guidelines, provide useful suggestions for the preparation

and revision of such policy and guidelines in a concrete manner, supervise the compliance with the anti-corruption measures, and review other relevant measures and internal controls.

3. The Executive and Risk Management Committee shall be responsible for assessing risks and determining anti-corruption preventive measures, as well as preparing, reviewing, and revising anti-corruption policy implementation guidelines to ensure that they are up-to-date, before submission to the Audit and Corporate Governance Committee and the Board of Directors for consideration. The matter shall then be disseminated and communicated to the Company's employees for their acknowledgement.
4. The President and other executives shall have the duty to promote and support the anti-corruption policy, the performance of duties with integrity, and the non-involvement in any actions that may cause corruption or a violation of laws. They shall lead by example, and comply with the business code of conduct in order to convey a message of commitment to all employees and entities involved.
5. The internal control system auditor shall have the duty to audit and review the compliance with the policy, the scope of authority to take actions, the implementation guidelines and requirements, or any relevant laws to ensure the presence of an appropriate internal control system that can cope with possible corruption risks. The auditor shall then report the results to the Audit and Corporate Governance Committee.

Kindly be informed and comply accordingly. This shall be applicable to the Company and its subsidiary.

Given on the 19th day of December 2017



Mr. Seri Chintanaseri
Chairman of the Board of Directors

Pylon Public Company Limited
Anti-Corruption Measure Manual

(Version as of 19 December 2017)

Table of Contents

Message from the President	3
Definition of “Corruption”	4
Anti-Corruption Policy	5
Implementation Guidelines; and Duties and Responsibilities	5
Anti-Corruption Organizational Chart	7
Scope of Enforcement	7
Implementation Guidelines	
1. Political Aid	8
2. Charitable Donations	8
3. Acceptance of Donations	9
4. Giving of Financial Support	9
5. Acceptance of Financial Support	9
6. Giving of Gifts or Reception Service Fees	9
7. Acceptance of Gifts or Reception Services	9
8. A Process to Control and Consider Requests for Charitable Donations, Financial Support, and Giving of Gifts and Reception Service Fees	10
9. Related Companies and Persons	10
10. Sales and Marketing	10
11. Procurement and Contract Execution	11
12. Human Resources Operations	11
13. Communications and Disclosure of Information	12
14. Data Recording and Keeping	12
15. Audit Process/Internal Control	13
16. Follow-Up and Review	14
17. Whistleblowing	14
Whistleblowing Report or Complaint Filing Form	19
Report Form of Acceptance of Gifts or Other Benefits	20
Appendix	

Message from the President

Pylon Public Company Limited is committed to driving its business towards sustainability and developing a transparent work system free from all forms of corruption. All of the Company's directors, executives, and employees take it seriously when it comes to fighting against corruption for shared business value and enhanced confidence among all stakeholders in moving the organization towards sustainable growth.

With such ambition, the Board of Directors passed a unanimous resolution for the Company to be a member of the Thai Private-Sector Collective Action Against Corruption (CAC) in 2016. The Company conducted corruption risk assessments as per details in the Annex, and also developed an anti-corruption policy and relevant measure manual to reflect the assessed risks, which should serve as guidance for operations. Such policy and manual were disseminated to the directors, executives, and employees as well as the business alliances and external parties.

I am confident that this anti-corruption policy and measure manual will yield benefits to all parties as they strive to ensure proper implementation which will propel our organization towards becoming free from all forms of corruption as per our ambition.



Dr. Chanet Sangarayakul

19 December 2017

Definition of “Corruption”

“Corruption” refers to the giving or receiving of bribes through direct or indirect means via presentations, promises, requests, or demands, whether in monetary or non-monetary forms such as gifts or services, to or from persons, agencies, or government and private organizations, for such persons, agencies, or organizations to perform or refrain from performing duties, or to obtain or maintain any undue interests.

Anti-Corruption Policy

The Company is committed to preventing and combating all forms of corruption through direct and indirect means and to ensuring that business operations with possible corruption risks are considered prudently. To this end, the Company established an “Anti-Corruption” policy in writing as approved by the resolution of the Board of Directors’ Meeting No. 6/2017 held on 19 December 2017. According to the policy, all directors, executives, and employees are prohibited from committing or accepting all forms of corruption through direct or indirect means. The policy extends to the business operations of the Company’s subsidiary which shall strictly comply with the policy. The compliance with this corruption policy, implementation guidelines, and operating requirements shall be regularly reviewed to ensure alignment with Thailand’s changing business and regulatory circumstances towards anti-corruption.

Implementation Guidelines

1. All directors, executives, and employees shall comply with the anti-corruption policy and the business code of conduct without involving in all forms of corruption through direct or indirect means for the benefit of oneself or one’s family, friends, or associates.
2. No bribes shall be given or received through either direct or indirect means regardless of whether in monetary or non-monetary forms, to or from persons, agencies, or government and private organizations, for such persons, agencies, or organizations to perform or refrain from performing duties, or to obtain or maintain any undue interests.
3. All forms of political aid shall not be given.
4. Money donations for charity or financial support must be accompanied by clear objectives and according to the scope of authority with transparency and auditability.
5. Giving or receiving gifts, reception service fees, and other expenses must be according to the scope of authority and based on transparency and auditability.

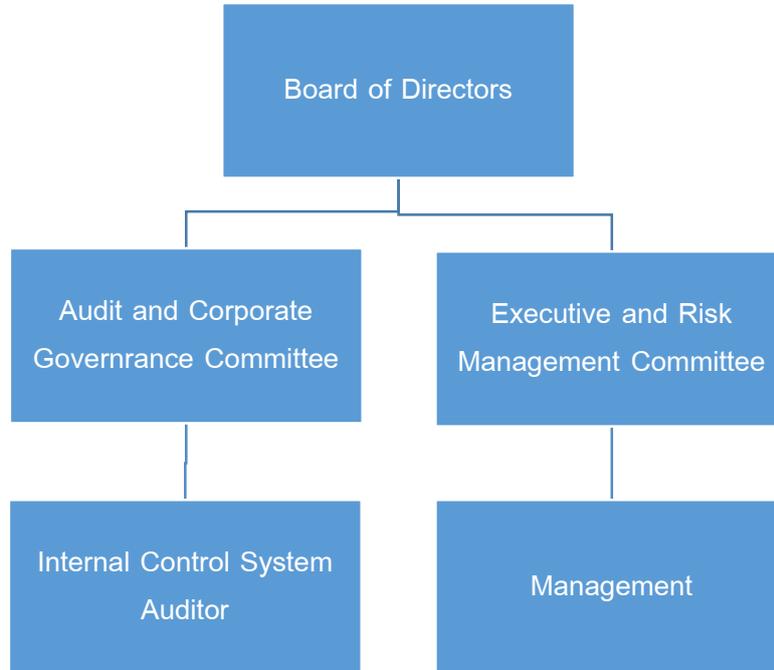
6. If an employee is seeking advice or having any inquiries relating to anti-corruption measures, they shall consult their supervisors or the Human Resources Department.
7. It shall be the duty of all employees to provide whistleblowing reports to or file complaints with responsible persons through whistleblowing report or complaint filing channels should they detect any behavior with an indication of corruption, and to provide collaboration in the fact-finding process.
8. The Company shall protect a whistleblowing or a complainant according to the stipulated guidelines. There shall be neither demotions, punishments, nor negative outcomes against employees who say no to corruption.
9. Directors, executives, and employees defying anti-corruption requirements of the Company shall be subject to disciplinary action according to the Company's regulations and directives, and shall be punished according to relevant laws.
10. The Company realizes the importance of communications and internal relations to promote knowledge and an understanding among its directors, executives, employees, and related persons, as well as the importance of external communications to the general public and stakeholders for their compliance with the anti-corruption policy.

Duties and Responsibilities

1. The Board of Directors shall have the duty to consider, approve, and determine an anti-corruption policy and to supervise the set-up of anti-corruption implementation guidelines in an efficient manner. This is to ensure that directors, executives, and employees attach importance to anti-corruption and embrace this norm as part of the corporate culture.
2. The Audit and Corporate Governance Committee shall have the duty to screen the anti-corruption policy and implementation guidelines, provide useful suggestions for the preparation and revision of such policy and guidelines in a concrete manner, supervise the compliance with the anti-corruption measures, and review other relevant measures and internal controls.

3. The Executive and Risk Management Committee shall be responsible for assessing risks and determining anti-corruption preventive measures, as well as preparing, reviewing, and revising anti-corruption policy implementation guidelines to ensure that they are up-to-date, before submission to the Audit and Corporate Governance Committee and the Board of Directors for consideration. The matter shall then be disseminated and communicated to the Company's employees for their acknowledgement.
4. The President and other executives shall have the duty to promote and support the anti-corruption policy, the performance of duties with integrity, and the non-involvement in any actions that may cause corruption or a violation of laws. They shall lead by example, and comply with the business code of conduct in order to convey a message of commitment to all employees and entities involved.
5. The internal control system auditor shall have the duty to audit and review the compliance with the policy, the scope of authority to take actions, the implementation guidelines and requirements, or any relevant laws to ensure the presence of an appropriate internal control system that can cope with possible corruption risks. The auditor shall then report the results to the Audit and Corporate Governance Committee.

Anti-Corruption Organizational Chart



Scope of Enforcement

The scope of enforcement of this policy shall cover all directors, executives, and employees.

Implementation Guidelines

To ensure a clear understanding of all directors, executives, and employees about proceeding with matters that may involve possible corruption risks, they shall exercise due care in taking actions in the following matters.

1. Political Aid

Political aid shall refer to any assistance in monetary or non-monetary forms to support political activities, including granting loans and other kinds of support through, for example, giving of supplies or services, campaigns to promote or support political parties, purchases of tickets for fundraising activities, money donations to organizations with close relationships with political parties,

granting of unpaid leaves to employees, or being corporate representatives to join political campaigning activities. The Company has guidance for handling this matter as follows:

1. The Company currently does not provide any forms of political aid. Relevant operating procedures are as follows:
 - 1.1 Should there be any request by a political party or organization with a close relationship with a political party, seeking the Company's political aid, the matter shall be proposed to the Executive and Risk Management Committee's meeting for consideration. The meeting shall not grant approval for the matter as it is in breach of the Company's anti-corruption policy.
 - 1.2 Results of consideration shall be reported to the relevant political party.
 - 1.3 A summary report on concerned matters shall be submitted to the Board of Directors' meeting for acknowledgement on a quarterly basis (if any).

Moreover, the Company shall communicate and disclose its policy of not giving political aid through various channels including management meetings, trainings for directors, orientation sessions for new hires, communications bulletin boards, leaflets, the corporate website, annual reports, or other means as appropriate. Also, punishments for those defying the policy shall be communicated.

2. All directors, executives, and employees shall be deemed to have the right and duty to independently participate in or support political activities for their personal purposes without misusing corporate assets and times in so doing.

2. Charitable Donations

It is the Company's policy to make charitable donations through granting approvals for charitable donations according to the scope of authority to take actions. The Company shall exercise due care in making donations of money or supplies based on donation requests as donations could be deemed as or linked to an indirect way of giving of bribes for the Company to obtain a project contract in the future.

3. Acceptance of Donations

The Company does not have a policy to accept donations in monetary or non-monetary forms from government or private organizations.

4. Giving of Financial Support

Financial support shall refer to money paid to customers or other persons on a reasonable basis with an aim to promote the Company's business, reputation, or business relationships. The transaction shall be made on an appropriate occasion, based on transparency, and accompanied by evidence for bookkeeping purposes. Also, names of related persons, amounts of financial support, and other details shall be identified. The Company shall exercise due care in providing financial support according to requests as such action could be deemed as or linked to an indirect way of giving of bribes for the Company to obtain a project contract in the future.

The Company put in place a process of controlling and checking to ensure that the supporting funds were not used to conceal an act of corruption. The steps of granting approval for and disbursing supporting funds shall be in accordance with the internal control process.

5. Acceptance of Financial Support

The Company does not have a policy to accept financial support from its customers, trading partners, joint investors, or other persons, regardless of purposes.

6. Giving of Gifts or Reception Service Fees

The Company does not have a policy to give gifts or any forms of reception service fees to its customers for bribery or building rapport in order to obtain future project contracts. An exception applies to the case of giving gifts or any forms of reception service fees based on the customary business practice with justification in order to maintain good relationships with customers provided that there shall be no expectations to receive any services or objects in return in a specific manner that breaches the code of conduct.

7. Acceptance of Gifts or Reception Services

1. Any gifts with a value of more than Baht 5,000 must be rejected. If rejection cannot be done, the recipient shall report the issue to the division chief. A report form of acceptance of gifts or other benefits shall be filled out and such gifts shall be handed over to the Company to be part of its assets. Any gifts in forms of cash, cashier's cheque, and gold must be rejected in all circumstances.

2. Acceptance of reception services must be according to customary traditions and appropriate for occasions. Transparency must be a priority.

8. A Process to Control and Consider Requests for Charitable Donations, Financial Support, and Giving of Gifts and Reception Service Fees

- 1) Charitable donations, financial support, and giving of gifts or reception service fees must be in accordance with the Company's policy.
- 2) There shall be clear objectives in making charitable donations, financial support, or giving of gifts and reception service fees.
- 3) In case of ongoing charitable donations, financial support, or giving of gifts or reception service fees, there must be a start date and an end date of such activity.
- 4) Name lists of persons, agencies, or organizations asking for donations, financial support, gifts, or reception service fees for various purposes must be provided.
- 5) There must be valid evidence of acceptance of things or cash receipts or other types of evidence of money acceptance such as thank you letters. Or, there shall be evidence indicating that an activity was committed to support a particular charitable project to achieve a specific objective. There shall be an indication that such charitable project took place, was for the benefit of the public, and corresponded to the Company's corporate social responsibility (CSR) objective.
- 6) An internal memorandum shall be prepared to propose a concerned matter to a person with approval authority. This shall be according to the Company's regulations and the scope of authority to take actions.

9. Related Companies and Persons

The Company has a policy of advising its subsidiary to implement the anti-corruption measures. The subsidiary shall be informed of the matter in writing and provide a response back to the Company.

10. Sales and Marketing

The Company has a policy about sales and marketing based on sound competition practices with fairness and good corporate governance. All biddings must be subject to approval according to the Company's scope of authority to take actions.

Sales and marketing with customers must be conducted based on the Company's code of conduct towards its stakeholders. The Company does not have a policy of proposing or giving financial or non-financial interests to any person or agency in order to obtain business contracts, privileges, special treatments or exceptions in violation of laws or codes of ethics.

11. Procurement and Contract Execution

The Company observes the principles of fair and transparent procurement and contract execution with all parties as all purchases and contract signings must be subject to approval by authorized persons according to the Company's scope of authority to take actions.

The Company does not have a policy of soliciting or accepting financial or non-financial interests from any trading partners in order to allow procurement of assets or equipment with conditions or qualifications lower than specified standards or services with substandard quality or not according to specifications stated in purchase orders.

12. Human Resources Operations

The Company has a policy and process of human resources management, including candidate selection, trainings, performance evaluation, giving of remuneration, and promotion for its employees, which reflects its commitment towards anti-corruption measures, gist as follows:

1. The process of candidate selection, performance evaluation, giving of remuneration, and promotion for the employees shall be undertaken based on the employees' knowledge, capabilities, experience, and proven achievements without any bias, prejudice, or personal relationships.

2. The Company shall facilitate trainings to enhance knowledge and experience in particular fields necessary for the performance of duties of respective employees in relevant positions. Also, there shall be orientation sessions in the Company's anti-corruption policy and measures for new hires and once-per-year recurring trainings in the said matter for existing employees. This is to show the Company's commitment to and expectations about its employees' awareness of the anti-corruption measures and punishments against violations thereof.

3. The Company shall not implement a policy or involve in a process of demoting, punishing or resulting in negative outcomes against employees who say no to corruption despite losses of business opportunities, gist as follows:

3.1 The President or high-level executives shall express their firm stance or commitment at anti-corruption measure training meetings that there shall be no demotions, punishments or negative outcomes against employees who say no to corruption despite losses of business opportunities.

3.2 The Company has in place a process of communicating such matter through various channels.

13. Communications and Disclosure of Information

The Company shall conduct internal and external communications about the anti-corruption policy and measures, the whistleblowing channels, and the policy of not demoting, punishing or resulting in negative outcomes against employees who say no to corruption despite losses of business opportunities, as well as other relevant information. This is to ensure that all directors, executives, employees, shareholders, customers, trading partners, and other stakeholders and relevant business parties can be aware of such policies. Communications channels range from management meetings, directors' training meetings, orientation sessions for new hires, and employee trainings, to other activities such as bulletin board communications, leaflets, publications in the corporate website, annual reports, and other appropriate means. This is to reinforce the vigorous implementation of the said policies and to reassure that the Company's resources and personnel are equipped with skillsets adequate for the implementation of the said measures.

Communications of the anti-corruption policy to customers and trading partners shall start since the beginning of a business relationship and proceed at later stages as appropriate.

With the Company's announcement of its anti-corruption policy, it will facilitate trainings to its existing directors, executives and employees. It will also facilitate orientation sessions for new hires covering directors, executives, and employees prior to the commencement of their work.

14. Data Recording and Keeping

The Company shall comply with standards, principles, and legal provisions mandating accounting and financial reports. It shall not allow false, incorrect, manipulated accounting records, or accounts outside of the financial statements to support or conceal corruption. The Company's practices regarding accepting or disbursing funds are as follows:

The Company's practices regarding accepting or disbursing funds are as follows:

1. Payments from customers, juristic persons, or other persons
 - 1.1 Prior to accepting payments, the financial function shall verify the details and correctness of relevant transactions.
 - 1.2 The financial function shall neither solicit nor accept financial and non-financial interests from customers to delay payments to the Company.
2. Payments to trading partners, juristic persons, or other persons
 - 2.1 Prior to making payments, purposes of such transactions shall be verified, and such transactions must be posted in the books of accounts by the accounting function and conform to accounting principles and relevant laws. Any incorrect or inappropriate transactions must be reported to respective supervisors for acknowledgement, and preventive and corrective solutions according to accounting principles and relevant laws must be identified.
 - 2.2 In all payments, approval authority shall be according to the scope of authority to take actions, and there shall be evidence of receipts of payments from trading partners.
 - 2.3 Payments to trading partners shall be based on agreed upon payment terms.
 - 2.4 There shall be no acts of soliciting or accepting financial or non-financial interests from trading partners in order to speed up payments to them.

The steps of keeping data available for auditing to confirm correctness and suitability of financial reports and to assure that there were no transactions being unrecorded or unexplainable or false can be summarized as follows:

1. To comply with the steps of accepting or disbursing funds mentioned above
2. All documents and records supporting making and accepting payments shall be attached to payment vouchers, and shall be placed in separate folders according to specific categories.
3. Data kept by electronic means shall be handled as follows:
 - Each person shall be granted a different level of access to specific data.
 - The file backup process shall be conducted at day end.
 - There shall be a modern data security maintenance system at international standards.
 - There shall be an IT team dedicated to database system management.
4. Various data shall be subject to audits by the auditors endorsed by the Securities and Exchange Commission (SEC) whose auditing work shall be based on auditing standards and

independent from the Company according to the code of professional ethics defined by the Federation of Accounting Professions (FAP) and other relevant codes of ethics. The auditors' auditing work is to provide reasonable assurance that the consolidated financial statements and the Company's financial statements are free from any material misstatements.

15. Audit Process/Internal Control

The Company has in place an internal audit process (covering risk assessments, sales and marketing system, procurement system, and measures to take corrective actions as appropriate as specified in the Annex) which shall be conducted annually by an internal control system auditor. The auditor shall be independent and one's scope of audit shall not be limited when performing the duties. The auditor performed the audits according to the internal control system audit plan which also covered anti-corruption. Moreover, quarterly and year-end audits were performed by the external auditors with CPA licenses according to requirements of the SEC, the Business Development Department, and the Revenue Department.

The steps of reporting audit results are as follows:

- 1.) The internal control system auditor shall report audit results and findings as well as relevant suggestions at least once per quarter to respective operating officers.
- 2.) The internal control system auditor shall report audit results and findings as well as relevant suggestions at least once per quarter to high-level executives for further presenting to the Audit and Corporate Governance Committee accordingly.
- 3.) The Chairman of the Audit and Corporate Governance Committee shall be presenting audit results to the Board of Directors accordingly.
- 4.) The internal control system auditor may directly report any urgent issues to high-level executives and the Board of Directors immediately.

16. Follow-Up and Review

The Company requires regular follow-ups on the implementation of the anti-corruption policy through the internal control system audit process. Any additional issues or risks shall be reported through the management and the Audit and Corporate Governance Committee for reviews and updates of the anti-corruption measure manual to ensure appropriateness.

17. Whistleblowing

The Company encourages its employees and stakeholders to partake in the monitoring of the compliance with laws, regulations, good corporate governance principles, and the business code

of conduct and desirable work practices. Any illegal act or business misconduct or behavior indicating corruption or malfeasance of a person in the organization shall be reported or a complaint against such matter shall be filed in order to ensure more transparency and efficiency in business operations. Thus, the Company stipulated a set of whistleblowing measures as well as a mechanism to protect whistleblowers or complainants and reported persons. As confidentiality of data collected through whistleblowing is crucial, acquired data shall be known only by assigned persons and other concerned parties. This is to provide assurance for the whistleblowers or complainants.

Whistleblowing Policy

The Company allows its internal and external stakeholders to report activities that are deemed illegal or in violation of relevant regulations, ethics, or rights; incorrect financial reports; internal control system deficiencies; or behaviors possibly indicating misconduct of persons within the organization to the Board of Directors. The stakeholders may report a case to a member of the Audit and Corporate Governance Committee or the corporate secretary for further submission to the Audit and Corporate Governance Committee for fact-finding. After due consideration, the Audit and Corporate Governance Committee shall report the case to the Board of Directors for consideration and further actions as deemed appropriate.

Whistleblowing or Complaint Filing Measures

1. Definitions

- 1.1 “Whistleblowing or Complaint Filing” refers to reporting information about an activity believed to be wrongdoing according to Item 2.
- 1.2 “Whistleblower or Complainant” refers to any director, employee, stakeholder, or external party.
- 1.3 “Recipient of Whistleblowing Reports or Complaints” refers to a corporate secretary or a member of the Audit and Corporate Governance Committee.

2. Matters for Whistleblowing or Complaint Filing

The Company encourages all of its employees and stakeholders to report to it immediately upon detection of any misconduct or behavior indicating possible wrongdoing in the following matters.

- Non-compliance with laws or regulations concerned and the business code of conduct

- Corruption and fraud
- Activities suspicious of money-laundering or irregularities in terms of accounting, finance, and controls and audits

3. Channels for Stakeholders' Whistleblowing or Complaint Filing

There shall be two channels for whistleblowing or complaint filing as follows:

Channel 1: Emails of three members of the Audit and Corporate Governance Committee as follows:

- Dr. Panja Senadisai panja.sena@gmail.com
Chairman of the Audit and Corporate Governance Committee
- Professor Emeritus Dr. Vinit Chovichien c_vinit@hotmail.com
Member of the Audit and Corporate Governance Committee
- Dr. Chaipat Sahasakul chaipats@icloud.com
Member of the Audit and Corporate Governance Committee

Channel 2: Corporate secretary through mail, telephone, and email as follows:

- Mailing to:
Ms. Thitima Tiewprateep, Corporate Secretary
Pylon Public Company Limited
No 252 SPE Tower, 14th FL., Phaholyothin Rd., Samsannai District, Phayathai
Didtrict, Bangkok 10400
- Tel. No. 02 615 1259 Ext. 108
- Email: thitima@pylon.co.th

4. Whistleblowing Report or Complaint Handling Process

1) Facts shall be collected and submitted to the Audit and Corporate Governance Committee.

A member of the Audit and Corporate Governance Committee or the corporate secretary who receives a whistleblowing report or complaint shall collect facts relating to fraud and corruption, violation or non-compliance with laws or codes of ethics, infringement of rights, incorrect financial reporting, or internal control system deficiencies. The recipient of the whistleblowing report or complaint may take relevant actions by oneself or assign other persons concerned to do so in one's stead.

- 2) The Audit and Corporate Governance Committee shall hold a meeting.

The Audit and Corporate Governance Committee shall hold a meeting to consider the report by the whistleblower or complainant based on all the facts collected, ask questions or seek further information from the management (as the case may be), and prepare a report for submission to the Board of Directors for endorsement.

- 3) The Board of Directors shall consider a report from the Audit and Corporate Governance Committee.

The Board of Directors shall consider a report from the Audit and Corporate Governance Committee and take actions as deemed appropriate accordingly.

- 4) Results shall be reported to the whistleblower or complainant.

The Board of Directors shall report results to the whistleblower or complainant within 2-4 weeks after receiving the whistleblowing report. In the case where the whistleblower or complainant disclosed themselves, if fact-finding could not be finished within a specified time frame, the member of the Audit and Corporate Governance Committee or the corporate secretary shall give a progress report to the whistleblower or complainant every two weeks.

5. Information about Whistleblower or Complainant

The whistleblower or complainant shall provide their name-surname for the Company to contact them back and ask for more information. In the case where the whistleblower or complainant does not intend to provide their name, the Company may conduct fact-finding based on the information received if it believes that such information could lead to a damage to the Company.

6. Guidelines to Protect Whistleblower or Complainant

Guidelines to protect the whistleblower or complainant from bullying, threatening or disposal of evidence are as follows:

- In fact-finding, the Company shall not reveal the name of the whistleblower or complainant.

- The Company shall keep relevant data confidential and make a disclosure only on a need-to-know basis. Safety and prevention of a possible damage to the whistleblower or complainant or relevant parties shall be priorities.
- Apart from the above, if the whistleblower or complainant still views that they could possibly be in trouble or subject to a damage, they may ask for the Company to provide protection measures for them.
- In the case where the whistleblower or complainant is an employee of the Company, there shall be no demotion, punishment or negative outcomes against the employee who says no to corruption.

7. Protection of the Reported Person

The Company realizes that it shall take responsibility for the reported person by keeping data relevant to the reported person confidential during the fact-finding, and shall consider fact-finding results before deciding on the matter. The Audit and Corporate Governance Committee shall allow the reported person to explain the case before drawing a conclusion on the matter as well as acknowledge the fact-finding results.

8. Making an Intentionally False Report of Information

If the whistleblower or complainant intentionally makes a false report of information, they shall not be protected under the prescribed measures, and shall be subject to disciplinary action or legal action.

9. Punishment

If fact-finding results reveal that the reported person did commit wrongdoing or that the whistleblower or complainant intentionally made a false report, the recipient of the whistleblowing report or complaint shall submit the case together with their opinion and guidelines on disciplinary measures and legal action to authorized persons for further consideration and relevant actions.

In the case of a director, executive, or employee defying the anti-corruption measures, they shall be subject to relevant disciplinary measures by the Company, for example, through warning letters, work suspension, or termination of employment where necessary.

10. Report on Whistleblowing Cases

The Audit and Corporate Governance Committee shall prepare and present a report on all whistleblowing cases to the Board of Directors while the corporate secretary shall collect relevant data for submission to the Board of Directors for endorsement.

Whistleblowing Report or Complaint Filing Form

Whistleblower's/complainant's name-surname	
Supervisory function	
Email	
Tel.	
Date of witnessing an incident or detecting relevant data	
Place of incident	
Functions concerned	
Names of persons involved	
Incident details	

Remark:

The whistleblower or complainant shall be contacted back by the recipient of the whistleblowing report or complaint and informed about the progress of the proceeding as well as if the report has enough information for the Company to conduct fact-finding within a specified time frame according to the whistleblowing report or complaint handling measures. The whistleblower or complainant, if preferring not to reveal their name or phone number, shall not be contacted back. The whistleblower or complainant, if intentionally making a false report or maliciously causing a damage to other people's reputation or creditability, shall be subject to disciplinary action and/or legal action.

Report Form of Acceptance of Gifts or Other Benefits

- To The Board of Directors (in case the Chairman is the recipient)
 The Chairman of the Board of Directors
 The President
 Division Chief (through supervisors according to the line of command)

On (date), I,

Position....., Function.....,

received a gift of (gift description).....

Signed.....

(.....)

Date.....

Instruction

There is justification and the person shall be permitted to have such item to oneself.

There is no justification for the person to have such item to oneself. The item shall be handed over to a central administration function for further consideration and submission to another function that should properly benefit from using such item.

Signed.....

(.....)

Date.....