



---

## **Raimon Land PLC. Anti-Corruption Policy**

---

**Policy Reference # IA003**

**Name of Document Owner: Internal Audit**

**Prepared by: Jakkalin Kornkul / AVP – IA**

**Date: August 9, 2017**

---

### **Revision Control**

<b>Revision no.</b>	<b>Date</b>	<b>Description of Change</b>	<b>Reviewed by</b>	<b>Approved by</b>
V1.0	March 3, 2015	Original Issue	Audit Committee	Board of Directors
V2.0	May 11, 2016	<u>Revision Notes:</u> <ol style="list-style-type: none"><li>1. Changed wording “Fraud” to “Corruption” and edit its meaning.</li><li>2. Added Corporate Value about Corruption.</li><li>3. Changed wording Anti-Corruption Policy in section 5 to Anti-Corruption Procedure and made some adjustments.</li><li>4. Separated punishment section and include enforcement and legal punishment to Directors, Management, and Employees in section 7.</li><li>5. Added content about management duty to implement the Anti-Corruption procedure in item 3.3.</li><li>6. Added protection procedure and no punishment policy for the Whistle-Blowers in item 6.3 and 6.5.</li><li>7. Added some adjustments according to the Anti-Corruption guideline</li></ol>	Audit Committee	Board of Director



V3.0	August 9, 2017	<u>Revision Notes:</u> 1. Changed Whistle-blowing channel from Khun Kittti and Dr. Siri to Dr. Siri and Khun Weidt	Audit Committee	Audit Committee (as authorized in the Anti-Corruption Program)
------	----------------	-----------------------------------------------------------------------------------------------------------------------	-----------------	-------------------------------------------------------------------

## Anti-Corruption Policy

Subject	Content
<p>1. Purpose of this Policy and Corporate Value</p>	<p>1.1 The purpose of this policy is to establish acknowledgement and collaboration among employees of “the company” including the external parties who has business relation with the Company with regard to the Anti-corruption policy. The policy also provides clear information and guidance to employees regarding the Anti-Corruption policy on how to comply with the policy.</p> <p>In accordance with this policy, the employees shall recognize, follow and conform to the policy effectively. Any employee who violates the terms of this policy will be subject to disciplinary action under the rules and regulation of “the company”.</p> <p>(Raimon Land Public Company Limited together with its subsidiaries is referred to herein as “The Company”)</p> <p>1.2 The corporate value is the company will not involve in any type of corruption and will cooperate with any organizations to countercheck the corruption.</p>
<p>2. Scope</p>	<p>2.1. This policy applies to all individuals working with “the company” at all levels including the company’s directors, defined as:</p> <p>The employees of “the company”, including officers, managers, senior managers, directors, executive directors, consultants, whether permanent, fixed-term or temporary, or any other person associated with “the company”, or any of subsidiaries or their employees, wherever located. Any query or question shall be consulted with the supervisor or an internal audit department directly.</p> <p>The company’s directors are the persons who have been appointed by the shareholders in the Annual General Meeting.</p>
<p>3. Role and responsibility</p>	<p>3.1. The board of directors has full authority and responsibility to determine the policy, and to monitor and control the effectiveness of the Anti-corruption policy implementation.</p>

Subject	Content
	<p>3.2. The audit committee has full authority and responsibility assigned by the board of directors to review internal control in each business process of “the company”, and to monitor that the internal control system is implemented effectively and lack of corruption. The audit committee shall also report the result of the investigation relating to any corruption condition to the board of directors.</p> <p>3.3. Management of “the company” has full authority and responsibility to establish the internal control system, and to encourage, support, and implement the anti-corruption procedure. They have to communicate this Anti-corruption policy to the employees at all levels, including review and revise the suitability and sufficiency of each business process in accordance with changes in business, rules, regulation and relevant laws.</p> <p>3.4. The authorized director will appoint the committee to investigate in any corruption act, members of the committee shall be appointed by the authorized director. Any decision or consideration by the committee shall be determined as final.</p> <p>3.5. An internal audit department must convey and communicate this policy both internally and externally and encourage the employees to understand, acknowledge, apply and comply with Anti-corruption guidelines and policy effectively, including update and revise the policy properly. Any inquiry shall be responded promptly by the department.</p> <p>3.6. The supervisor of all individuals working at all levels must monitor to ensure that their subordinates follow and comply with this policy strictly, including provide advice and guidance where any question is needed to be consulted.</p>
<p>4. Definition of Corruption</p>	<p>4.1. Corruption is the abuse of public resource, or the misuse of entrusted power and elected authority for private gain through misconduct of the company’s rules and regulation, which covers any action, whether offering, promising, soliciting, demanding, giving or accepting bribes, influencing, distrusting or any action identified as probable risk in corruption.</p> <p>4.2. “The company” determines the definition of “fraud” as the same as “corruption”.</p>

Subject	Content
<p>5. Anti-corruption procedure</p>	<p>5.1. Management and the employee at all levels and departments, including consultants, whether permanent, fixed-term or temporary, must not involve corruption or accept corruption of all forms in any circumstances, covering the business of “the company” in every country and in every relevant government agency, public enterprise agency and private organization.</p> <p>5.2. The following course of action may be considered as corruption, whether direct or indirect or incur the risk in corruption act, the employees of “the company” shall pay attention and conform these actions carefully:</p> <ul style="list-style-type: none"> <li>5.2.1. Giving and accepting gifts and hospitality</li> <li>5.2.2. Giving and accepting cash or cash equivalent</li> <li>5.2.3. Offering bribery to a government official</li> <li>5.2.4. Giving and accepting bribery in any course of business</li> <li>5.2.5. Fraudulent action with any private organization</li> <li>5.2.6. Any charitable donation or contribution shall be made with the condition of being transparent and complied with the laws.</li> </ul> <p>5.3. All employees shall notify any act of corruption as defined in the policy to their supervisor, management of “the company”, or an internal audit department. They should considerably cooperate with the investigation.</p> <p>5.4. Any employee who commits the corruption and violates the terms of this policy will be subject to disciplinary action. In case such act violates the law, the conviction must be applied.</p> <p>5.5. This policy must be reviewed regularly by “the company” and revised properly on a yearly basis.</p> <p>5.6. “The company” complies with the anti-corruption laws in Thailand.</p>
<p>6. Whistle-Blowing policy</p>	<p>6.1. “The company” shall establish whistle-blowing channels beyond internal channel of the company as whistleblower reporting can be made by the employees, suppliers, or the public. The whistle-blowing channels are also disclosed in the Annual Report.</p> <p>6.2. “The company” shall establish whistleblower channel through Chairman of the Audit Committee Dr. Siri Ganjarerndee email:siripusa@gmail.com or 44/2</p>

Subject	Content
	<p>Moo 6 Bangpai Subdistrict, Bangkae District, Bangkok 10160 or through Audit Committee member Khun Weidt Nuchjalearn email: <a href="mailto:weidt.nuchjalearn1@gmail.com">weidt.nuchjalearn1@gmail.com</a> or My Resort Bangkok Condominium, New Petchaburi Road, Tower B, Unit 194.</p> <p>6.3. “The company” shall keep the identity of the whistleblower confidential and shall provide comprehensive protection and justification to the whistleblower.</p> <p>6.4. “The company” shall disclose information only as needed with the concern of whistleblower’s safety against discrimination or retaliation.</p> <p>6.5. “The company” shall not demote, punish, or haze the employee who refuse corruption or make whistle-blowing even if the whistle-blowing may deprive the company’s business opportunity.</p>
<p>7. Punishment for the person who breach or deny the Anti-Corruption Policy</p>	<p>7.1. The Director who breach or deny the Anti-Corruption Policy will be under proper investigation by the committee appointed by the Board of Directors. The investigation committee comprises at least three directors. One of the committee must be an independent director. The director who gets involved with the corruption will not be appointed to be the investigation committee. The committee shall report the result and recommend the punishment to the Board of Directors (except the director who gets involved with the corruption).</p> <p>7.2. Management and employee who breach or deny this policy must have taken disciplinary action as recommended by the investigation committee appointed by the company.</p> <p>7.3. The person who gets involved with the corruption must have taken disciplinary action according to the company’s regulation.</p> <p>7.4. For the case that breaching or denying the Anti-Corruption Policy is also breaking the applicable laws, the case is subject to prosecution.</p>
	<p>This Anti-corruption policy is effective from August 9, 2017 onwards.</p> <p>Approved by Audit Committee of Raimon Land Public Company Limited.</p>