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

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### **Policy Reference # IA004**

**Name of Document Owner: Internal Audit**

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### **Revision Control**

<b>Revision no.</b>	<b>Date</b>	<b>Description of Change</b>	<b>Reviewed by</b>	<b>Approved by</b>
V1.0	August 9, 2016	Original Issue	Audit Committee	Board of Directors
V3.0	August 9, 2017	<u>Revision Notes:</u> 1. Changed Whistle-blowing channel from Khun Kittu and Dr. Siri to Dr. Siri and Khun Weidt	Audit Committee	Audit Committee (as authorized in the Anti-Corruption Program)

## Anti-Corruption Program

Item	Content
1. Purpose	<p>1.1 The purpose of this program is to establish the practical guideline to implement the Anti-Corruption Practices and Procedures entire the “Company” with regard to the Anti-Corruption Policy.</p> <p>(Raimon Land Public Company Limited together with its subsidiaries is referred to herein as “The Company”)</p>
2. Scope	<p>2.1. This Program applies to all individuals working with “the company” at all levels as defined in the Anti-Corruption Policy.</p>
3. Role and responsibility	<p>3.1. Department heads who take responsibility for any tasks as defined in the Program and as assigned in the relevant Job Descriptions will have responsibility to complete those tasks.</p>
4. Anti-Corruption Program	<p>4.1. Risk Management according to the Anti-Corruption.</p> <p style="padding-left: 40px;">4.1.1. The Company will prepare Risk Management Policy which approved by Risk Management Committee.</p> <p style="padding-left: 40px;">4.1.2. Corruption Risk Assessment will be included in the Company’s Risk Profile and will be evaluated at least once a year.</p> <p style="padding-left: 40px;">4.1.3. The Company will prepare Risk Management plan to manage risk to the acceptable level.</p> <p>4.2. Communication Procedures and Disclosure</p> <p style="padding-left: 40px;">4.2.1. <u>Publicly</u>: The Company will communicate the Anti-Corruption Policy and Code of Conduct to public by publishing it in the Company’s Website and disclosing it in the Annual Report and 56-1 Form (Disclosure Report concerning Additional Information). Alternatively, the company will join an active contractor’s regular meeting to communicate the Anti-Corruption Policy at least once a year.</p> <p style="padding-left: 40px;">4.2.2. <u>Internally</u>: The Company will communicate the Anti-Corruption Policy and Code of Conduct to all employees via E-mail at least</p>

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	<p>once a year and inform all new employees in the orientation program.</p> <p>4.2.3. The Company will disclose the Anti-Corruption Policy and Code of Conduct by posting it in every locations of the Company.</p> <p>4.2.4. The Company will communicate and disclose the Whistle-Blowing Policy as defined in the Anti-Corruption Policy both publicly (4.2.1) and internally (4.2.2).</p> <p>4.2.5. The Company will communicate and disclose that they 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 Policy as defined in the Anti-Corruption Policy both publicly (4.2.1) and internally (4.2.2).</p> <p>4.2.6. The Company will communicate and disclose the punishment to the person who breach or deny the Anti-Corruption Policy both publicly (4.2.1) and internally (4.2.2).</p> <p>4.3. Training Procedures</p> <p>4.3.1. The Company will provide training about the Anti-Corruption Policy and related necessary knowledge to all employees at least once a year via an in-house training.</p> <p>4.3.2. The Company will provide training about the Anti-Corruption Policy and related necessary knowledge to Directors and Managements at least once a year via a meeting and/or small-group training.</p> <p>4.4. Human Resources Procedures</p> <p>4.4.1. Recruitment: The Company will include the Anti-Corruption value and/or ethical behavior in the interview process and mention the Anti-Corruption Policy in the Employment Contract.</p> <p>4.4.2. Performance Appraisal and Promotion: The Company will include the Anti-Corruption value and/or ethical behavior in the performance appraisal and promotion processes.</p> <p>4.4.3. Training: The Company will provide training to all employees</p>

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	<p>regarding Anti-Corruption Policy and relevant knowledge accordingly.</p> <p>4.5. Internal Control</p> <p>4.5.1. The Company must implement the internal control processes to prevent corruption.</p> <p>4.5.2. The Company must implement proper internal control in Finance and Accounting Processes to ensure that the book-keeping process and relevant processes are in place to prevent corruption.</p> <p>4.5.3. The Internal Audit Department must evaluate the internal control processes properly at least once a year to ensure the sufficient internal controls are implemented in countering bribery.</p> <p>4.5.4. The internal control system in particular the accounting and record-keeping practices, are subject to regular internal audits to provide assurance that they are effective in countering bribery.</p> <p>4.6. Internal Audit Plan according to the Anti-Corruption</p> <p>4.6.1. The Internal Audit Department will perform “The Anti-Corruption Program” compliance audit annually according to the annual internal audit plan which will be approved by the Audit Committee.</p> <p>4.6.2. The Internal Audit Department will perform the audit tasks in order to prevent corruption every year. Procurement Process Audit and Sales Process Audit have to be included in the Annual Internal Audit. The Internal Audit Department will audit these processes according to the plan.</p> <p>4.6.3. When corruption is found or is a perceived problem with a government official, the internal audit department and/or senior management of the company will report the Audit Committee or the Board of Director in the upcoming meeting or as soon as possible if the problem will affect the company’s operation significantly.</p> <p>4.7. Gift, Donation, Sponsorship, Hospitality, and Entertainment including Related Expenses</p>

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	<p>4.7.1. The Company will prepare Authority Matrix to identify the guideline to approve Gift, Donation, Sponsorship, Hospitality, and Entertainment, and Related Expenses.</p> <p>4.7.2. Gift, Donation, Sponsorship, Hospitality, and Entertainment, and Related Expenses transactions must be approved and reimbursed properly and supported by the evidences as defined by the Authority Matrix, the Accounting Policy and Procedures, and “Gift, Donation, Sponsorship, Hospitality, and Entertainment Policy and Practical Guide”.</p> <p>4.7.3. Gift, Donation, Sponsorship, Hospitality, and Entertainment, and Related Expenses transactions must have proper internal control to ensure the compliance with the Anti-Corruption Policy.</p> <p>4.7.4. The Company will communicate “Gift, Donation, Sponsorship, Hospitality, and Entertainment Policy and Practical Guide” both publicly and internally as explained in item 4.2.1 and 4.2.2.</p> <p>4.8. Purchasing Policy</p> <p>4.8.1. The Company will prepare the Purchasing Policy to identify the proper procedure to compare and select vendor including the proper Authorization Matrix according to the policy.</p> <p>4.9. Accounting Policy</p> <p>4.9.1. The Company records the accounting transactions properly according to the relevant Standards on a timely basis. The company will maintain accounting information and supporting evidences sufficiently and conform with the Anti-Corruption Policy.</p> <p>4.9.2. The Company will prepare the Accounting Policy to identify the procedure for book-keeping where the accounting transactions are properly recorded on a timely basis and have sufficient evidence and support the Anti-Corruption Policy.</p> <p>4.9.3. The Company will prepare procedures to maintain available for inspection accurate books and records that properly and fairly document all financial transactions.</p>

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	<p>4.9.4. The Company will prepare procedures to ensure that there are no “off-the-books” accounts, inadequately defined transactions or false entries.</p> <p>4.10. Reporting the Corruption Case to the Board of Directors and Management</p> <p>4.10.1. Corruption case when found must be reported, by management who is responsible for the related process, to the Board of Directors as soon as possible or in the upcoming meeting. In the meantime, the case must be reported to CEO.</p> <p>4.10.2. Investigation result about the corruption case must be reported by management who is responsible for the related process to the Audit Committee and the Board of Directors as soon as possible.</p> <p>4.11. Whistle-Blowing Procedure</p> <p>4.11.1. The Company established whistle-blowing channel through Chairman of the Audit Committee Dr. Siri Ganjarendeem email:siripusa@gmail.com or 44/2 Moo 6 Bangpai Subdistrict, Bangkhae 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>4.11.2. Whistle-Blower could be an employee, supplier, contractor, customer, investor, or individual who get involved with the Company.</p> <p>4.11.3. The Company will protect the whistle-blower from discrimination or retaliation and the company will 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>



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5. Authority Delegation from the Board of Directors	5.1. The Board of Directors delegated the authority to make any changes to the Anti-Corruption Policy to the Audit Committee since the effective date of this program.
	This Anti-corruption Program is effective from August 9, 2017 onwards. Approved by Audit Committee of Raimon Land Public Company Limited.