



## Anti-Corruption Policy

Reviewed on 17 January 2024

## 1. Objectives

The Company has established this Anti-Corruption Policy with the objective of preventing any actions related to fraud and corruption in any form by the directors, executives, and employees of the Company, whether directly or indirectly, for their own benefit, their families, friends, or acquaintances, whether in the capacity of recipients, providers, or bribe offerors, in form of monetary or non-monetary, to government agencies or private entities whom the Company do business with. The Company is committed to strictly adhering to this Anti-Corruption Policy.

## 2. Definitions

Company	means G-Able Public Company Limited
Company Personnel	means the Company's directors, executives, and employees
Corruption	means any actions whether it be offering, promising, soliciting, demanding, giving, or accepting assets or any other benefits to government agencies or any other individuals doing business with the Company, whether directly or indirectly, to induce such individuals to act or refrain from acting in order to obtain or retain improper business benefits, unless permitted by local laws, regulations, customary practices, or trade ethics.
Political Contributions	means providing support, whether financially or in other forms, to political activities, such as offering goods or services, advertising, promoting, or endorsing a political party, purchasing tickets for fundraising events, or making donations to organizations closely associated with a political party.
Charitable Contributions	means donating money, or goods or any other things that can be calculated in monetary terms to a charitable organization without expectation of return.
Sponsorships	means money given or received, items provided, or any other form of measurable compensation from customers, or business partners with the objective of promoting the business, brand, or reputation of the Company.
Gifts, Hospitality, and other Associated Expenses	means the giving or receiving of gifts, welcome service fees, hospitality fees, and other associated expenses which do not affect the Company's performance but are in accordance with the relevant laws. It is given or received in the name of the Company, not as individual, at appropriate for occasions, such as New Year, Songkran, Chinese New Year, which is normal and openly.

Conflict of Interest	means any activities that involve personal interests or those of related individuals, whether by blood or other connections, that may influence decision-making and that may impede the maximum benefit of the Company.
Facilitation Payment	means a certain amount of money paid to government officers unofficially, providing assurance that the officers will follow due processes or expediting actions without relying on discretion and is a legally recognized right of individuals.
Government Officers / Government Employees	means a government officer, employee, worker, group of persons, or individual working in administrative agencies, dispute tribunal, committee or person with legal authority to issue regulations, orders, or decisions that affect individuals.

### 3. Roles and Responsibilities

- (1) The Board of Directors is responsible for establishing and overseeing an effective and efficient anti-corruption system to instill awareness and importance of resisting corruption and embedding in the corporate culture.
- (2) The Audit Committee is responsible for auditing the Company's compliance with the established anti-corruption policy and related guidelines, as well as financial reports, internal control system and internal audit. This is to ensure that operating activities of various departments are effective and comply with laws, regulations and ethical standards.
- (3) The Chief Executive Officer and executives at all levels are responsible for establishing and promoting systems that support the anti-corruption policy and communicating the same to employees and stakeholders across all departments, as well as reviewing the appropriateness of systems and measures to ensure alignment with changes in business, regulations, rules, and relevant laws.
- (4) The Internal Audit Department is responsible for reviewing the operational processes to ensure correction, compliance with policies, practices, operational regulations, and the approval authority, as well as compliance with the relevant laws. This is to ensure that the Company has an internal control system that is adequate and sufficient. The department reports directly to the Audit Committee.
- (5) The Risk Management Department or the Risk Management Working Group is responsible for advising relevant departments to conduct assessments of fraud and corruption risks, and determining appropriate measures to reduce the risks that may arise.
- (6) The Company Personnel are obliged to adhere to the Anti-Corruption Policy, including the Company's rules, regulations and relevant laws in a strict and disciplined manner.

#### 4. Scope and Guidelines

- (1) The Company Personnel are prohibited from demanding, engaging in, or accepting corruption for the benefit of the Company, themselves, their families, friends, acquaintances, and related individuals.
- (2) The Company Personnel shall adhere to the anti-corruption policy, refraining from involvement in any form of corruption, whether directly or indirectly.
- (3) The Company Personnel who violate and fail to adhere to the anti-corruption policy will be subject to disciplinary action in accordance with the Company's regulations. At the same time, the Company has a policy not to demote, penalize, or have negative consequences for the Company Personnel who reject fraud and corruption, even if such actions result in the Company losing business opportunities.
- (4) The Company Personnel shall not overlook or ignore any observed or suspected acts of corruption. The Company Personnel are required to report such incidents to the Company through the designated reporting channels and cooperate in investigating the facts as specified in the Company's regulations.
- (5) The Company will ensure fairness and protection for the Company Personnel who reject corruption or report incidents related to corruption involving the Company, using protective measures for complainants or those who cooperate in reporting and disclosing incidents of corruption as specified by the Company. Complaints and the names of complainants will be kept confidential.
- (6) The company provides secure communication channels for its personnel and all stakeholders to give advice, express concerns, provide suggestions, or file complaints regarding corruption.
- (7) The Company will communicate, disseminate information, and provide advice to its personnel and stakeholders regarding the anti-corruption, ensuring that the Company Personnel and relevant parties adhere to this Anti-Corruption Policy, including notifying external parties that the Company's policy aligns with Thailand's laws in combating corruption.
- (8) The Company has established the management of corruption risks by conducting risk assessments, prioritizing risks, and implementing measures appropriate to the assessed risks, as well as monitoring the progress of the risk mitigation regularly.
- (9) The Company establishes operational manuals and work instructions with sufficient details to ensure compliance with policies and prevent corruption in business operations.
- (10) The Company implements internal control and audit systems to ensure the effectiveness and efficiency, covering processes of financial record-keeping, accounting, human resource management, procurement processes, and other processes related to the Company's operations.
- (11) The Company has a human resource management process that reflects its commitment to the anti-corruption policy and measures, ensuring the availability of resources and skilled personnel suitable for implementing the anti-corruption policy.

- (12) The Company establishes appropriate processes for reporting, monitoring, and reviewing its compliance with the anti-corruption. This is to ensure that the policy is comprehensive, sufficient, and responsive to the situation.
- (13) The Company is committed to creating and maintaining a corporate culture that firmly rejects corruption, both in transactions with the government and the private sector.

In this regard, the Company requires its directors, executives, and all employees to work with prudence and caution against any form of corruption, as follows:

#### **Political Contributions**

The Company has a policy of not providing the Political Contributions, whether directly or indirectly, or engaging in activities that endorse any political party or political group. The Company has practices related to Political Contributions as follows:

- (1) The Company has a policy of not providing the Political Contributions, endorsing political parties or politicians, and supporting, whether financially or non-financially, political parties, politicians, or political candidates, either directly or indirectly.
- (2) The Company Personnel have the freedom to participate in any political activities as allowed by the Constitution. However, the Company Personnel shall not claim that they are doing so as the Company's staff or not use the Company's resources, equipment, or assets for any political activities or actions that could create the perception that the Company is involved or supports such activities.

#### **Charitable Contributions and Sponsorships**

The Company has a policy for controlling and overseeing the Charitable Contributions and any form of Sponsorships to ensure that these activities do not become channels for corruption. As such, specific processes and controls are clearly defined together with auditing procedures to ensure that the Charitable Contributions and the Sponsorships are transparent, comply with the Company's regulations, and adhere to the laws. The Company's practices regarding the Charitable Contributions and the Sponsorships are outlined as follows:

- (1) The Charitable Contributions and the Sponsorships activities shall be conducted solely on behalf of the Company. It must be ensured that the Charitable Contributions and the Sponsorships are not used as a pretext for bribery. The activities must be transparent, specifying the name of the recipient and/or the beneficiary. Additionally, it should be demonstrated that these activities genuinely contribute to societal benefits.
- (2) The Company Personnel wishing to participate in the Charitable Contributions or the Sponsorships on behalf of the Company shall submit the request form. The form shall include details of the contribution amount, the recipient's and/or the beneficiary's name, the objective of such contribution or sponsorship,

and be accompanied by supporting documents. The request shall be presented to the authorized person within the Company for approval. Additionally, all relevant evidence documentation, including receipts, must be submitted to the relevant department for thorough verification.

- (3) The Company implements tracking and auditing procedures to ensure that the Charitable Contributions or the Sponsorships are not utilized for corruption, forming an integral part of the oversight and internal auditing processes.

#### **Gifts, Hospitality, and other Associated Expenses**

The Company has a policy to prohibit the Company Personnel from demanding, accepting, giving, or promising to give any assets, valuable items or other benefits to customers, business partners, or business-related persons to induce them to perform or refrain from any actions falling within the abovementioned activities. This is except for cases of normal customary practices where gifts are given. The Company determined practices regarding the Gifts, Hospitality, and other Associated Expenses as follows:

- (1) The Company Personnel are prohibited from demanding, accepting, giving, or promising to give any assets, valuable items or other benefits from customers, business partners, or business-related persons, whether for personal gain or for others. Such actions may result in biased decision-making, create unfair advantages, or cause discomfort, leading to conflicts of interest.
- (2) Accepting or giving shall not create any undue advantages through inappropriate or implicit actions, explicit exchanges, or hidden exchanges to obtain assistance or compensation benefits, leading to unwarranted concessions in inappropriate business agreements. Gifts from the Company shall be given on behalf of the Company, not personally, and may be presented with the Company's logo to align with appropriate occasions or situations.
- (3) The Company Personnel shall not accept improper gifts or any other benefits in return for their routine operations. However, it is acceptable for accepting gifts, hospitality fee and/or other associated expenses if it is a customary manner during festive seasons or traditional occasions.
- (4) The Company will communicate to its personnel about the Company's practices for gifts, hospitality and other associated expenses.
- (5) The Company will inform customers, business partners, or business-related persons about its policies and practices regarding gifts, hospitality fee and/or other associated expenses through communication channels or systems, documents, or brochures used for the Company's promotional activities.

#### **Facilitation Payments**

The Company does not have a policy of paying money for any form of convenience, both directly and indirectly. It will not engage in or accept any actions in exchange for facilitating business operations. The Company has the following practices:

- (1) The Company Personnel are prohibited from giving, requesting, or promising that facilitation payment, property or any other benefits will be given to governmental officers in order to induce to act, not act, delay action, which affect the Company's business operations.
- (2) Business dealings with government sectors must be transparent and strictly comply with relevant laws.

#### Employment of Government Officers / Government Employees

Employment of the Government Officers / Government Employees poses an increased risk of corruption and conflicts of interest, as it may lead to overlapping benefits that could compromise the impartiality of the officers in performing their duties for the maximum benefit of the state. Therefore, to prevent such situations, the Company has a policy of not employing the Government Officers / Government Employees as employees.

#### **5. Submitting Complaints and Whistleblowing**

The Company has established complaint and whistleblowing channels for any alleged breach of laws and code of conduct, possible acts of corruption, improper behaviors or wrongdoings by the Company Personnel or other stakeholders, as well as any violation of the anti-corruption policy. There are mechanisms in place to protect whistleblowers, and confidentiality is emphasized in handling complaint information to build confidence for complainants and stakeholders involved in overseeing and monitoring the Company's interests.

##### (1) Providing Opportunities for Stakeholders to Report Complaints or Whistleblowing

To encourage the Company Personnel to conduct their tasks in a correct, transparent, and verifiable manner, the Company has established complaint and whistleblowing channels, covering receipt of complaints, investigation and making conclusion as well as protection of complainants, whistleblowers and involved persons. This process encompasses receiving complaints, opinions, or suggestions from stakeholders who have a vested interest and may be impacted or at risk due to the Company's business activities or the actions of its personnel. This includes activities that may suggest malpractice or corruption.

If anyone encounters suspicions regarding work practices, activities, or any business transactions that may fall under violations of the Company's policies, anti-corruption guidelines, or legal regulations, they are required to notify or report such information to the relevant parties through the designated complaint and whistleblowing channels.

##### (2) Complaint and Whistleblowing Channels

Postal mail: Chairman of the Audit Committee  
G-Able Public Company Limited  
No. 127/30 Panjathani Tower, 25<sup>th</sup> Floor, Nonsi Road,  
Chong Nonsi, Yanawa, Bangkok 10120

Email: [whistleblowing@g-able.com](mailto:whistleblowing@g-able.com)

Website: [www.g-able.com](http://www.g-able.com)

(3) Protection for Complainants and Whistleblowers

The Company establishes policies and guidelines to protect individuals providing information or reporting wrongdoing. The Company commits to keeping the information of complainants and whistleblowers confidential. Those responsible for handling such information as part of their duties are obligated to maintain the confidentiality of complaints and related documents. Disclosure is strictly prohibited, except as required by legal obligations.

**6. Monitoring and Review of the Anti-Corruption Policy**

The Company establishes a regular review process for the anti-corruption policy and measures, including practices. This review is conducted consistently, and every organizational unit within the Company, according to its organizational structure, shares the responsibility for conducting thorough and appropriate reviews. The findings are presented to the Company's Board of Directors for consideration and approval.

**7. Training and Communications**

The Company has a policy to communicate and disclose information related to anti-corruption policy and measures to the Company Personnel, stakeholders and related persons, including the subsidiaries, other companies having control over, and business representatives for acknowledgement and adherence. This communication is conducted through the Company's communication channels, public relations activities, the Company's website, or other appropriate channels to ensure that the Company is an organization that supports anti-corruption, conducts its business operations transparently, and can be audited.

**8. Management of Corruption Risk**

The Company implements a risk management system for fraud and corruption. This involves risk assessments, prioritization, and the establishment of appropriate measures. Additionally, the Company consistently monitors the progress of the implemented measures.

**9. Internal Control and Audit on Compliance with the Anti-Corruption Policy**

The Company has established an independent internal audit department to assess the adequacy of internal control systems, risk management systems, business supervisory processes, and key operational activities as well as key working systems of the Company, such as procurement and commercial operations. This assessment focuses on adequacy, appropriateness, and efficiency in line with the defined objectives, as well as full compliance with the applicable legal requirements, rules and regulations, and the Anti-Corruption Policy.