



## **Anti-Corruption Policy**

- ACT 247 Co., Ltd. (hereinafter referred to as “ACT”) is committed to its business under the compliance of the laws and highest standard of conducts and ethics. The Company has implemented standards and guidelines mandatory to prevent any unfair business activities that may occur and to prevent any corruptible acts. In addition, the Company adheres to Thailand’s anti-corruption laws, including laws of other countries that it conducts business.
- ACT adopts a zero tolerance policy on corruption or bribery. Individuals who work for the Company or its affiliates, Directors, Executives, full-time or part-time staffs, interns and freelance contractors, representatives, consultants, vendors and service providers to ACT (referred to as “affiliates”) shall not use bribery as a means to receive or maintain a business or gain advantage in unfair dealings.
- Staff or affiliates who are proven guilty of corruption or bribery shall be met with strict punishment, including termination of employment and/or contract as deemed necessary. Other actions may include filing a legal case pertaining to anti-corruption laws.
- ACT has a policy to not pay any third party or government officials to facilitate any of the organization’s business procedure. Such facilitation payments shall be considered a form of bribery that is legally prohibited in many countries.
- ACT shall provide fair and reasonable treatment to staff who cooperate in reporting any incidents, including those who are filed for accusation on corruption as indicated.
- The act of cultivating business relationships and maintaining ongoing relationships with its customers through gift-giving and meals bears its risks. Such activities may have influence towards inappropriate or partial decision making or could result in an unfair business dealing that can lead to bribery. ACT therefore explicitly requires all staff to abide by, which includes giving or receiving donations or sponsorships that shall be done with transparency, and can be audited for proof that such funding was not bribery under the guise of sponsorships.
- All ACT staffs shall acknowledge and learn the anti-corruption policy which is a part of ACT’s code of ethics and should be pledged at the beginning of their employment. For ACT’s affiliates, the Company understands the importance in providing information and establishing a clear understanding of anti-corruption practices.

### **Definitions: Corruption and Facilitation Payment**

- Corruption is an act of bribery (direct or indirect) that entails a proposal, contract, advantages, acceptance or obtaining money or favors (in forms of money or other favors) that results in an improper business dealing or unfair business proposition.
- Facilitation Payment is an act of informal payment rendered to government officials to expedite the procedure, even though such procedure is a routine practice.