



Anti-Corruption Policy

The Company is committed to pursuing its business operations, emphasis on transparency with ethics and responsibility to shareholders, customers, employees, society and others stakeholders. The Directors, the Management and all level of employees are prohibited from operating or accepting, soliciting, demanding, or accepting assets or other benefits to other persons in business dealing with the Company, whether directly or indirectly, as a motive for them to do or refrain from doing any act to acquire or keep benefits that are unsuitable to the business, except as allowed by the laws, rules, regulations, local customs or tradition, or business customs, to create the balanced consideration of all related parties and fair treatment to all parties concerned. The Company has conducted anti-corruption awareness as guideline policies for the management and employees of the group to perform in compliance with the principles of good corporate governance, Code of Conducts and/or related to the terms and regulations or any legal issues to create sustainable value and long-term growth of the business.

Objective

1. All level of employee must not induce to act or refrain from acting that may lead to malfeasance and corruption, by not involving in corruption, whether directly or indirectly.
2. To support all level of employees' roles and responsibilities to take part in the activities of Anti-Corruption Policy Corruption, not to solicit, demand, or accept assets or other benefits to other persons in business dealing with the Company,
3. To conduct its business with fairness and enhance the confidence to its stakeholders.

Scope of Anti-corruption Policy

Stakeholders of the Company who involve in Anti-Corruption Policy Corruption are classified into 2 major groups as follows:-

1. **Internal** : Director, Management Team, and all level of staffs/employees
2. **External** : Customer or suppliers, contractors sub-contractors, business partners, creditors, governmental authorities and private officers.



Anti-corruption Definition

Corruption means any types of bribery; an offering, agreement to give, giving, promising to give, soliciting, or receiving of money, asset, or other inappropriate benefits from the government officers, government sectors, private sectors, or responsible person either in direct or indirect action so that such person could proceed or disregard his/her function in order to acquire, retain the business, recommend specific company to the entity, or achieve any improper benefits in business transaction. Exception shall be applied in case of laws, regulation, statement, standard, custom, or business traditions enable to do so.

Roles and Responsibilities

1. The Board of Directors is responsible for determining the policy, monitoring, and forming an effective system supporting Anti-corruption act in order to affirm that the Management Team intensively concerns, emphasizes, and cultivates Anti-corruption mindset as the company's culture.
2. Presidents and the Management are responsible for determining Anti-corruption system, promoting, and encouraging Anti-corruption manner conveyed to all staff and related parties. This also includes reconsideration on system or regulation in order to best adjust with business changes, regulation, standard, and laws.
3. The Audit Committee is responsible for revision of financial and accounting reports, internal control, internal audit function, and risk management so that such operations are concise, appropriate, effective, and conformed to global standard.
4. Internal Audit Director is responsible for auditing, assessment, and evaluations in business transactions whether they are accurate and complied with guidelines, approval authority, standard, laws, and policy in such monitored department in order to assure that the internal controls are sufficient and suitable for probable risk in corruption. This shall be directly reported to the Audit Committee.

Anti-corruption Guidelines

1. Staff shall not be negligent in any corruption conditions involved directly with the Company. All staff must notify such act to supervisors or responsible person provided in particular channels, including collaborate with the fact finding investigation.



2. A person who commits the corruption is considered disciplinary offenses. This means such person is needed to consider discipline followed by the Company's standard. Conviction on laws may be applied in case such act violates the laws.
3. The Company shall provide fairness and safeguard staffs who inform corruption cases relating to Anti-corruption information.
4. The Company concerns the importance of dissemination, knowledge sharing, and constant communications to employees.
5. The Internal Audit Department of the Company will be responsible for reviewing and evaluating internal control systems, disclosure of Company information, and to review implementation of the provisions and risk management systems that can mitigate risks against corruption and report directly to the Audit Committee.

Provision in Implementation

Implementation on Anti-corruption Policy (to interact properly with business partners and the related parties who have conflicts of interest)

All level of employees will be responsible for Anti-corruption Policy in the business connection with customers, suppliers and all parties concerned. (Thereinafter called "related parties who have conflicts of interest" who have a direct impact on business operations)

1. The employees must comply with the anti-corruption policy and measures, the Company's corporate governance principles and code of business conduct and hospitality activities from other persons in business dealing with the Company.
2. The employees must not accept Gifts, Entertainment and Hospitality Offering gifts or entertainment and hospitality activities from other persons in business dealing with the Company, by not involving in, whether directly or indirectly.
3. Employees must not corrupt or accept corruption of all forms in any circumstances, covering the business otherwise getting prior approval from the direct supervisors. Any acceptance thereof as above from other persons must comply with the anti-corruption policy and measures, the Company's corporate governance principles and code of business conduct and does not have any impacts in business decision of such employee.



4. The employees must not perform any act to acquire or keep benefits from their positions in the Company to accept Gifts, Entertainment and Hospitality Offering gifts or entertainment and hospitality activities from other persons in business dealing with the Company.
5. Whenever the employees advise the personnel to the Company, those actions must not be against the benefits and/or recruitments of the Company or refrain from doing any act to acquire or keep benefits that are against related laws and regulation.
6. There are no close relationships between supervisors and their under supervision within the same departments such as, couple marriage, parents or offspring, that may impose conflicts of interest.
7. Business Relation and Procurement Process with the Public Sector or all types of bribery or illegal payments are prohibited in all business transactions, operation, and connection to the government.
8. Corrupt persons violate or fail to comply with the anti-corruption measures and must face punishment under the Company's rules and may also face prosecution if the action violates the law.
9. Employees must be granted an approval from their supervisors before offering all types of gifts (such as the Company's products) or entertainment and hospitality activities to other persons covering the business to be in compliance with the anti-corruption policy and measures, the Company's corporate governance principles and code of business conduct. In case of emergency that in any circumstances, it has not been granted approval from their supervisors in advance, such employees are deemed to get an approval from their supervisors whatsoever after offering all types of gifts (such as the Company's products) or all forms in any circumstances, to other persons covering the business.
10. The employees must not acquire or take benefits from their positions in the Company to perform inappropriate relationship, sexual harassment and other verbal or physical harassment of a sexual nature, any kinds of treatment or consideration of, or making a distinction in favor of or against (such discrimination based on race, sex, disabilities or religious). This also includes burglary, threats, force or any other kind of the action that violates the law.



11. Employees should ask or request for opinions from their supervisors or responsible persons when the employees face or doubt any act that is considered corruption in order to avoid any argument.

File complaints or reports of Fraud

1. Complaints or recommendations

- 1.1 A complaint if encountering any acts that is considered corruption, direct or indirect.
- 1.2 Any act that is considered corruption and/or have a direct effect on the internal control of the Company cooperate in the fact-finding investigation stipulated by the Company's regulations.
- 1.3 Any act that has a direct impact on the Company's reputation and benefits.
- 1.4 Any misconduct that act against the laws, moral and business ethics.

2. Suitable report channel to file a complaint

When they face or doubt any act that is considered corruption, employees have responsibilities to notify supervisors or responsible persons or through suitable report channels.

3. Channels of Communication between the Company and its Employees (Internal complaint)

1. Head of the Internal Control Department/ Head of the Human Resources Department or Head of Legal Department.
2. Mail Box
3. E-Mail : Orapin@tpipoleneppower.co.th

4. Channels of Communication between the Company and outsiders (External complaints)

1. Letters : Mrs. Orapin Leophairatana
Vice Chairman
TPI Polene Power Public Company Limited
26/56 Chan Tat Mai Road, Thungmahamek,
Sathorn, Bangkok 10120
2. E-Mail : orapin@tpipoleneppower.co.th



3. Letters : The Audit Committee

TPI Polene Power Public Company Limited
26/56 Chan Tat Mai Road, Thungmahamek,
Sathorn, Bangkok 10120

4. Tel. no. 02-285-5090 or 02-213-1039 Internal Audit Department

Identities and confidentiality protected

1. Identities protected

As the whistleblower or the person filing the grievance in good faith are greatly beneficial to the Company and all employees, therefore, the whistleblower or the person subject to such grievance and parties involving in the fact-finding and reporting process, no matter difficulties they might have, the Company will ensure that no employees shall be demoted, penalized or be otherwise affected because they honestly decline to participate in corruption.

The Company has the policy to investigate such reports with equity transparency, care and fairness and subject them to a proper investigation, information will be kept confidential and only be revealed when necessary while we will take into consideration safety and damage of the whistleblower or the person filing grievance, which will be carried out in a confidential manner to ensure staff who make the reports will have their identities protected.

2. Names and Confidentiality Protected

The whistleblower or the person filing the grievance (various groups of stakeholders or employee) may choose not to reveal his name, address or contact number unless he feels that such a disclosure will enable the Company to inform him a progress. Information will be kept confidential and only be revealed when necessary while we will take into consideration safety and damage of the whistleblower or the person filing grievance. The Company will hear all such reports with equity transparency, care and fairness and subject them to a proper investigation, which will be carried out in a confidential manner to ensure staff who make the reports will have their identities protected with fair treatment.



Fact-finding process and Penalty

1. Having received the grievance, the Management Representatives, whose members consist of the Compliance Unit and the Audit Committee, will be responsible to conduct an investigation.
2. Under fact-finding process, the Management Representatives and the Audit Committee might assign the Management Representatives to keep them informed the progress of further investigation.
3. In case that tips or grievance found to contain materiality, the person committing corruption or violating or failing to comply with the anti-corruption measures. The Company will grant the opportunities for the persons committing corruption or proved to be guilty to acknowledge the excuses and reserve the right for them to prove themselves by providing additional information, evidencing that they don't involve in any corruption or violating or failing to comply with the anti-corruption measures as accused.
4. In case that the person who is committed corruption or violating or failing to comply with the anti-corruption measures, are proved to be guilty, The Company will take actions in accordance with the established procedures to investigate and levy disciplinary punishment on employees at fault relating to corruption matters. Such person will be considered discipline followed by The Company standard. Conviction on laws may be applied in case such act violates the laws. The Management's decision is considered the final judgment for punishment on employees at fault relating to corruption matters.

Disclosure of the Anti-corruption Policy

1. The Company announces the written publication of the Anti-corruption Policy and measurements as a principal guideline for employees to follow.
2. The Company disclose the written publication of the Anti-corruption Policy and measurements through the Company's channel, such as letters, The Company's Website and Annual Report., etc.
3. The Anti-corruption Policy is needed to be reviewed regularly, including with a possible revision of such policy and implementation provision in order to accord with business changes, regulation, standard, and laws.