



<b>Anti-corruption and bribery Policy</b>	<b>Reference number : SRMD 01/2020</b>
	<b>Review date : -</b>
	<b>Approval Date : June 19, 2020</b>
	<b>(The Board of Directors Meeting no.4/2020)</b>
	<b>Effective date : June 19, 2020</b>
	<b>Supersede date : -</b>

This policy provides a framework for all business operation under Berli Jucker Public Company Limited and the group company (hereinafter referred to as "BJC Group"). BJC Group is committed to operating both international and national businesses based on honesty, transparency, justice and the principle of good corporate governance. BJC Group has commitment to comply with applicable laws and regulations, including countering any form of corruption and bribery.

**Definition according to anti-corruption and bribery policy**

**Fraud** is intentional act committed to obtain unlawful gains for one’s self or others.

**Corruption** is any forms of bribery by offering and promising to give, claiming, and receiving asset, property, or misappropriated profits from a person who involves or has responsibility towards business. Corruption is committed to persuade mentioned persons to do or omit their duties in order to require or maintain business. Corruption includes giving exclusive business opinion, or securing unfair or unlawful business gains, unless allowed by laws, regulations, tradition, culture or market conduct.

**Political contribution** is a direct or indirect act of giving any property, assets, rights or any other benefits to help, to support, or to seek any profits for political party, politician, or a person who involve with political matters, including political activities.

**Policy scope**

This policy applies to all business operation under Berli Jucker Public Company Limited and its subsidiaries.

**Guideline**

All committees, executives, employees and persons, who has been appointed to do business matters for the benefits of BJC Group or under BJC Group Company’s name, must comply with anti-corruption and bribery policy as follows:

1. All must strictly comply with anti-corruption and bribery policy, code of conduct, governance guideline, regulation, including any guideline and policy that relate to the company. All must not directly or indirectly participate in any corrupted and fraudulent activities.
2. When suspect or believe that there are corrupted and fraudulent incidents, all must not neglect and immediately report to the superior or responsible person through provided channels, including cooperating in the investigation of facts. BJC Group will provide appropriate protection to the whistleblower.
3. In order to clarify the management system of high risk situations that are most likely to occur corruption and bribery. Thus, the committees, executives, and employees at all levels must be careful of these actions as follows:

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- 3.1 Gift giving and receiving, including reception must comply with relevant laws, code of conduct, and policies of BJC Group. Those must conduct with innocent intention, and does not seek any inappropriate compensation.
- 3.2 No giving or receiving bribery for the purpose of business operation including contacting with government. All conducts must be transparent, honest and in accordance with relevant laws. However, BJC Group allows its internal and external parties to receive and give gift, if it is given as a conventional gift; the given gift must not impact any receiver's business decision. In case of receiving any conventional gifts, which have abnormally high value from business partners, a receiver (employee) must report to the superior.
- 3.3 Giving or receiving charitable contribution and sponsorship must conduct with transparency, and comply with relevant laws, code of conduct, and policies of BJC Group. Furthermore, BJC Group will ensures that any charitable contributions or sponsorships will not be given as a bribery.
- 3.4 Direct or indirect political contributions must comply with laws, conduct with transparency, properly disclose, including receiving approval from the company's committee or board of directors before giving political contributions.

### **Anti-corruption and bribery measures**

BJC Group will proceed to oppose corruption and bribery as follows:

1. Establish procedures for communication, and communicate anti-corruption and bribery policy and relevant other policies to all employees, joint ventures, business partners, including external parties and others properly.
2. Support establishing risk assessment that covers corruption and bribery, and internal controls which will cover all important activities of the company in order to ensure that BJC Group's goal will be achieved. Furthermore, the designed controls will review the procedures and processes to be conducted according to regulations and provisions. Additionally, internal controls will also provide recommendations to improve the efficiency of the practices.
3. Recruiting, training, work assessing, remunerating, promoting, and designing institution by properly separating the duties to have checks and balances are procedures of personnel management that reflect a commitment towards anti-corruption and bribery policy and measure.
4. Design and implement communication channels allowing employees and external parties to report any tips. BJC Group establishes clear policy, procedure and measure for protecting the whistleblower. In addition, BJC Group also establishes investigation procedure, upholds justice and provides solution by communicating policies, reporting channels and procedures to employees and external parties properly.