

Anti-Corruption Policy

1. Purpose of Policy

TISCO Financial Group Plc., the parent company of TISCO Group, recognizes the importance to prevent the group from being a vehicle for money laundering and financing of terrorism activities which cause operations and reputations risks and lead to severe damages.

TISCO Group has joined a participating group, which is “Collective Action Coalition against Corruption in Private Sector”, with other 160 private companies. This project is the national project which is supported by the Thai Government and the Office of the National Anti-Corruption Commission (NACC).

Anti-Corruption Policy provides a blueprint of TISCO Group principles and practices in carrying out Anti-Corruption program, to be consistently carried out across all business units in TISCO Group and Subsidiaries. The policy is mandatory for directors, senior managements and all level of employees. It reflects TISCO Group compliance strategies that are aligned with corporate vision, missions, and strategies, and will serve as a guiding framework for formulating enterprise-wide compliance action plan. The policy is also aligned with the overall risk management policies and guidelines of TISCO Group.

2. Definition

Term	Definition
Corruption	means the abuse of entrusted power for private gain.
Bribery	means the offering, promising, giving, accepting or soliciting of direct / indirect advantage as an inducement for an action which is illegal, unethical or a breach of trust. Inducements can take the form of gifts, loans, fees, rewards or other advantages (taxes, services, donations, etc.).
Collective Action Coalition against Corruption in Private Sector (CAC)	means corporative national program to fight against corruption in public and private sector. The program is supported by the Thai Government and the Office of the National Anti-Corruption Commission (NACC).

3. Policy Statement

TISCO will assess risk related to corruption, implement compliance program and provide business conduct guidance to directors, managers and employees to fight against corruption, with details as follows

1. Prohibit bribery in any form in all activities under control and ensure that charitable and political contributions, charitable contribution, sponsorships and gift/ hospitality / other expenses are transparent and will not be for the purpose of attempting to influence the recipient, whether government or private, into an improper exercise of functions, duties or judgment.
2. Compliance and consistent with all relevant anti-bribery laws in all the jurisdictions in which the company transacts its business.
3. Publicly disclose information of the policy externally and update the information regularly.
4. Publicize this policy internally through codes of conduct, to guide directors, managements and employees towards ethical and accountable behavior at all times, and will apply appropriate sanction for violation of the code.
5. No employee will suffer demotion, penalty or other adverse consequences for refusing to pay bribes even if such refusal may result in the company losing business.
6. Provide training program to employee to promote integrity, honesty, and accountability in the exercise of their duties and responsibilities and to convey with resolve our company's commitment to ethical business practices.
7. Implement appropriate internal control systems and controls to prevent unethical conduct by employees, ensure good governance, and institutionalize the values of integrity and accountability in the business.
8. Maintain appropriate financial reporting mechanisms that are accurate and transparent.
9. Provide appropriate channels of communication to the employees and other stakeholders to report suspicious circumstances in confidence without risk of reprisal, and a designed officer will be tasked with investigating all report received.
10. Support a nationwide initiative intended to create fair market conditions, transparency in business transactions and ensure good corporate governance.
11. Participate in roundtable discussions, meetings and forum to identify the key concerns and current problems affecting the private sectors related to integrity and transparency in business transactions.
12. Share "best practice", tools and concepts which are intended to be used by all participating entities to achieve the goals of the nationwide initiative.

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13. Enter into integrity pacts with other business and with government agencies if required when dealing with procedures related to the bidding and procurement of supplies, materials, equipment and construction.
 14. Assist and contribute ideas to develop a common framework for the “Business Code of Conduct” acceptable to all participating entities
 15. Participate in the creation of key measures and control activities intended to ensure transparency, integrity and ethical business practice
 16. Cooperate with civil society and the media to create awareness and educate the public in changing social values to condemn corruption in all forms.
 17. Support the development of an audit and certification program (including a training program for advisors and auditors) that will offer a toolbox for enterprises to introduce and implement ethical practices in their business processes; and institutionalize the whole process to promote sustainability of this Anti-Corruption Coalition initiative.
 18. Cooperate with the certification process of the Collective Action Coalition Council and consider the recommendations made by the Council.