

Anti-Corruption Policy

The Erawan Group Public Company Limited “ERAWAN” conducts our business based on the Corporate Governance Principle. We have formulated an anti-corruption policy against all forms of corruption likely to emerge from our operations and contacts with stakeholders which directors, the management and employees of the Company, our subsidiaries and associated firms are required to strictly comply with.

Corruption as defined by the anti-corruption policy

Corruption means bribery, using of title, responsibility and/or information derived from work performed for the company to render the benefit to one’s self, his/her alliance and/or other parties in order to directly and indirectly acquire an improper assets or benefits in business transaction or any illegitimate interest for oneself including any action found conflicting with the Company’s Code of Conduct . Exception shall be applied in case of laws, regulation, statement, custom, or business traditions enable to do so.

Corruption is possibly expressed through the following 4 course of actions

1. **Political Contribution** – a contribution made in form of money or items for the political purpose or an encouragement of the company to have its staff participating in any political activities under the name of the company, in order to seek an business advantages . This, however, excludes the case where the staff is willing to participate in such political campaigns or activities on the basis of democratic right.

Erawan has adopted a policy of political neutrality in conducting the business. We will neither align or attach to the politics or professional politician of any party nor donate our funds or other forms of assistance for political purpose as defined in paragraph one for the benefit of our business.

2. **Charity donation** - a financial contribution made for religious, educational and public interest purposes and etc. that may lead to the risk of corruption since the activity relates to a payment without any tangible returns. Such the activity can become an excuse or a means of corruption. To avoid the hidden purpose on any charitable contribution, Erawan has established a policy, criteria, reviews process and control details on a charitable contribution as follows.

- 2.1 Must be proven that the project actually exists and the action has been taken to support the achievement of the project’s objectives and bring about genuine social benefits.

- 2.2 Must be proven that the contribution is irrelevant to reciprocal return with anyone or any organization, however, such return will not include an action of honor announcement as normal business practice such as displaying the logo, mentioning the name at the event or on PR media etc.

3. **Sponsorships** – a financial contribution made for the promotional purposes on company business, logo or reputation that may lead to the risk of bribery since such money is paid for service or benefits which are difficult to measure and monitor. The sponsorships could be related to the bribery, hence, Erawan has established a policy, review process, control details and assessment methods on sponsorships as follows.
 - 3.1 Must be proven that the requestor for sponsorship has actually run the project and the actions have been taken to support the achievement of the project's objectives and bring about genuine social benefits.
 - 3.2 Must be proven that the sponsorship or any form of benefits which have monetary value, such as the offering of accommodation and food, are irrelevant to reciprocal return with anyone or any organization, however, such return will not include an action of honor announcement as normal business practice.
4. **Gift, Hospitality and Expense** – the expense that occurred and related to the special occasion, tradition or business manners which may lead to the risk of fraud or corruption, hence, Erawan has established a policy and criteria on giving or accepting gifts to ensure that the company strictly complied with the tradition and normal business manners.

Whistle blowing and controlling measures

Should anyone come across or doubt over the violation of the Code of Conduct or relevant rules, laws and regulations, the Company has set up an independent unit to review details informed by such whistleblower who may either be an internal employee or an external party through the following process for the purpose of fact-finding:

1. **Fact-finding process:** Erawan has set up a grievance-filing channel on its website, through the annual report under the topic of corporate governance statement and also through Code of Conduct. Our fast and systematic fact-finding process refers to the following:
 - 1.1 Sufficiency and clarity-details of what is revealed or filed must be true and/or enough to conduct an investigation.
 - 1.2 Materiality-as for tips or grievance found to contain materiality, the person receiving the grievance will submit the matter to the Disciplinary Action Committee whose members consist of the Compliance Unit, the HR Unit, the department in which the person being the subject of such grievance is working and the unit in which the whistleblower or the person filing the grievance (in case of an employee) is attached to in order to conduct a further investigation for fact-finding purpose.

- 1.3 The whistleblower or the person filing the grievance will be equally protected whether he is an employee or the third party.
- 1.4 The whistleblower or the person filing the grievance may choose not to reveal his name, address or contact number unless he feels that such a disclosure will enable Erawan to inform him a progress, to inquire him additional information that could be beneficial to the case, to notify him the facts or to relieve him from damage in a quicker and more convenient manner.
2. **Fair treatment process:** the Disciplinary Action Committee will review the case on a fair basis and will protect the whistleblower or the person filing the grievance, the person handling the grievance, the person subject to such grievance and parties involving in the fact-finding and reporting process. 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 the grievance, the person subject to such grievance or those cooperating in the fact-finding process, source of information or other related persons where everyone will sign a pledge together.
3. **Reporting process:** The Disciplinary Action Committee has a duty to directly report the facts of the matter to the President and/or the Audit Committee and/or the Board of Directors, depending however on what has happened where it will be upon the Committee's discretion to decide to what extent it is appropriate to present the report to a responsible person where Erawan has stipulated the following as a framework:
 - 3.1 To the President if it's about general management and the matter is under the President's supervision;
 - 3.2 To the Audit Committee if it's related to the corporate governance policy and/or if it's an intended violation of one's duty and responsibility with serious effect;
 - 3.3 To the Board of Directors after the Audit Committee's decision that it's appropriate that the matter be reported thereto for its acknowledgement and/or for action relating to the supervision policy; and/or if the matter is having an effect to senior executives .
4. **Disciplinary action and reporting :**
 - 4.1 Disciplinary action shall be in line with the Employee's Disciplinary Action Regulations issued by the Company and/or relevant laws.
 - 4.2 In case the Company can contact the whistleblower or the person filing the grievance, it will report the person in writing.
 - 4.3 Related supervisors are required to monitor improvement actions, if any, and report their line supervisors.