



Anti-Corruption Policy

Muang Mai Guthrie Public Company Limited (“Company”) is committed to conducting business with morality under the framework of good corporate governance by adhering to good governance principles, code of conduct and ethics for business operation and having responsibility and accountabilities to environment and all stakeholders. Our business is conducted with honesty, transparency and fairness and auditable. Our company aims to participate in “Thailand's Private Sector Collective Action Coalition against Corruption” in order to demonstrate the intention and determination of anti-corruption in all forms. Accordingly, we establish anti-corruption policy and clear guidelines for business conduct to be in line with the laws, morals, good corporate governance principles and business ethics of the company. In order to make such a policy effective in practice, the company uses internal communication channels to create correct knowledge and understanding as well as enhancing the awareness of the company's personnel and those related to the business of the company, which will lead to the creation of organizational culture to fight against all forms of corruption in order to create a good foundation of sustainable business development.

1. Definition

Corruption means an action or inaction against the duty and position or wrongful use of the authorization for seeking undue benefit in various forms, whether by way of giving or accepting bribes, offering, committing to give, undue requesting or demanding money, property or other benefits from any government official, government agency, private agency or any other person who conducts business with the company; for such person to act or omit to perform duties which are the means for obtaining business or for other improper business benefits except in the case permitted by laws, regulations or notifications.



2. Duties and responsibilities

- 2.1 **The Board of Directors** has duty to set policies and supervise in order to have an efficient anti-corruption support system so that all employees in the company can understand and realize its importance and instill it into organizational culture.
- 2.2 **The Audit Committee** is responsible for auditing financial and accounting reports, internal control system and internal auditing system as well as supervising and verifying the implementation of this guideline.
- 2.3 **The Executive Committee, Managing Director and the Management** are responsible for determining the guideline related to anti-corruption including reviewing the suitability of various systems and measures in order to be in line with business changes and changes in rules, regulations and provisions of law and communicating those to employees and all related parties.
- 2.4 **The Executive Committee, Managing Director and the Management** are responsible for assessing the risks associated with corruption and reviewing the sufficiency and suitability of anti-corruption measures. subsequently, submit the operational report and suggestion to the Board of Directors.
- 2.5 **The Corporate Governance Committee** has duty to supervise, give advice and monitor regarding the compliance with corporate governance policy as well as the anti-corruption policy and measure.

3. Anti-corruption policy and practice

The company will **not tolerate** any form of corruption which covers all businesses and transactions in all relevant departments. The Board of Directors, executives and employees and subsidiaries are requested to strictly comply with anti-corruption policy. **Do not** involve with any form of corruption, whether directly or indirectly.

- 3.1 Not to express, to the public officials and private sectors or any related parties, any manner as an intention to commit corruption, property offering or acceptance of bribes in order to obtain or retain business or to gain competitive advantage for own interest or other concerned persons.



- 3.2 Not to ignore or overlook when discovering any action that is considered to be related to the corruption that involves with the Company. It is regarded as a duty to notify the supervisor or the responsible person and give them the cooperation for examining the facts.
- 3.3 The Company will provide fairness and protection to those who refuse corruption or inform/report any corruption to the company as stipulated in the aggrieved person protection measure or those who cooperate in the reporting of corruption.
- 3.4 An employee who commits corruption is considered as violating business ethics and morals. The employee involved will be judged determined for penalty in accordance with the company's disciplinary action. In addition, such employee may be punished according to the law if such actions are illegal.
- 3.5 The Company gives emphasize on sharing of knowledge and understanding to those who work with the Company regarding the issues which may impact the Company or matters under the anti-corruption policy such as orientation of new employees, training courses for company's personnel, announcement on company's website, etc. However, the guidelines may be revised from time to time as the Company may see fit and all related parties will be informed accordingly.
- 3.6 The Company has consistently determined adequate and efficient monitoring process and internal control system to be undertaken by internal and external agencies in order to prevent corruption.
- 3.7 The Company has provided a process of human resources management that reflects Company's commitment to anti-corruption from recruitment, background check, training, evaluation, remuneration and promotion.
- 3.8 The Company operates business as a politically neutral corporate entity and will not support or be interested in any political party and will also not provide financial assistance or supplies to any political party for the purpose of earning business benefits. All employees have freedom to participate in political activities. However, they must not claim themselves as company employees or use any company property or equipment for political gain. If any employee participates in any political activity, such employee must take precaution for a misunderstanding that the company supports and is interested in any political party



- 3.9 Regarding the donation and sponsorships, the Company has clear, transparent and legal guidelines. The Company must only be named as the donator and only through the approval process in accordance with the company's regulations and ensure that the financial support will not be used as a mean to avoid bribery. The sponsorship must be for the purpose of public relations, business promotion and good image of the Company. The sponsorship can be done in various ways such as cultural activities, social activities (CSR), educational and sport activities, etc.
- 3.10 Regarding gift and entertainment, the Company realizes that establishing good business relationship is an important factor will lead to continuous success of the Company. Therefore, the following guidelines have been established:
- Directors, executives and employees are able to provide give and entertainment to business partners if all of the following conditions are met:
- (1) It is not an act of influence, inducement or reward to any person for gaining advantage through improper act or any hidden action to get assistance or benefit.
 - (2) It complies with applicable laws and Company's rules and regulations.
 - (3) It is done openly and publicly on behalf of Company and not for any employee.
 - (4) The type and value of gift is appropriate and suitable with the occasion. For instance, during the tender, the gift or entertainment to government officials, company employees or related agency should be suspended.
 - (5) It is suitable for the situations such as giving small gifts during festivals which are customary.
 - (6) Directors, executives and employees of the Company may receive gives or any other benefits during festival or when it is under normal practice with a value not exceeding 3,000 Baht. Gifts received must not be cash or cash equivalent such as gift vouchers, gift certificates, etc. If the gift received exceeds 3,000 Baht and the recipient cannot refuse to accept the gift, the recipient must notify the supervisor immediately, provide report and transfer such gifts to the Human Resources Department to use as rewards for staffs during the festivals or for further charity donations as it may be appropriate.

4. Measures and channel for submitting complaints and concerns

The Company has set procedures for report complaints and concerns regarding illegal actions, business ethics, non-compliance with policies and regulations or any behavior that may indicate corruption of any Company personnel. The Company has appropriately provided various communication channels for employees and stakeholders to conveniently submit the complaints and concerns through the following channels.

4.1 Channels for receiving complaints and concerns about corruption

- Postage: Chairman of the Board / General Manager
Muang Mai Guthrie Public Company Limited
Muang Mai Building, 9/17, Thepkasattri Road
Ratsada Sub-district, Mueang District, Phuket Province 83000
- Email: admin@mmguthrie.com Human Resources
pitaya@mmguthrie.com President of the Executive Board
- Website: www.mmguthrie.com
- Suggestion box in company premise

4.2 Protection measure and confidentiality

In order to protect the complainant and informant under Clause 4.1, the Company will not disclose name, address or any other information that can identify the complainant and informant. The Company will keep all information as confidentiality. The Company will limit only for the persons who are responsible to investigate the complaint to access the information and they shall have duties to keep secret about the information, complaints and evidences. The information **will not be** disclosed unless it is required by law. In the event the complaint is made against the management or high level executive, the Audit Committee will be in charge for protecting the complaints, informants, witnesses and persons giving information during investigation from any harm or unrighteousness due to providing the information.



5. Investigation process and punishment

- 5.1 When the Company has received report, the Audit Committee will delegate the internal auditor or appoint Investigation Committee and will inform the complainant from time to time about the investigation result.
- 5.2 If the investigation of the fact has obtained reasonable information and evidence to believe that the respondent has truly committed corruption, the Company will give the right to the respondent to acknowledge the allegation and prove himself/herself that he/she does not involved with the alleged corruption.
- 5.3 If the respondent has truly committed corruption, it will be considered that such respondent, whether being a director, executive or employee, has violated the anti-corruption policy and business ethics of the Company. Such person will be subject under the disciplinary action according to the rules and regulations of the Company. In addition, if such offense is a violation against the law, the respondent may be subject to legal penalties.
- 5.4 The Company **has no policy** to demote or reduce penalty for any employee has committed corruption even if that action causes the Company to lose business opportunities.

6. Training and communication

- 6.1 The Company has provided the communication for the awareness of anti-corruption policy and practice including various channels to submit complaints and concerns, for example, human resources management, recruitment, training, performance evaluation, new employee orientation, notice board, company's website, etc. in order for all employees in our organization to correctly and seriously comply with the anti-corruption policy and measure.
- 6.2 The Company has communicated and published anti-corruption policy, as well as channels for reporting complaints and concerns, to general public, subsidiaries, business agencies, business partners and stakeholders through various channels such as notice board, company's website, annual report, etc. to raise awareness and encourage the adherence to standards of social responsibility regarding the anti-corruption as the company does.