



## **Announcement of Bangkok Commercial Asset Management Public Company Limited on Anti-Corruption Policy**

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The meeting of the Board of Directors of the Company No. 4/2020 on March 6, 2020 resolved to approve a revision of the anti-corruption policy with a determination to uphold, in business operation, integrity, fairness and responsibility to society and all groups of stakeholders under the corporate governance principles. The Company has made a declaration of intent to join “Thailand’s Private Sector Collective Action Coalition Against Corruption (CAC)” in a bid to demonstrate its intention and commitment to denounce all forms of corruption, raise anti-corruption awareness among its directors and personnel at all levels, foster moral values, and increase confidence among all groups of stakeholders. As such, the Company has issued the announcement on anti-corruption policy in conformity with the corporate governance principles whereby its directors and personnel at all levels are obligated to adhere to the anti-corruption policy, the details of which are as follows:

### **1. Principle and Rationale**

The Company inculcates its directors and personnel at all levels with good conscience and awareness of performing their duties with integrity and without seeking benefits from their positions or offering any favors to other persons, and also keeps them informed of the penalty and the adverse effects and damages caused by corruption. In this respect, the Company has established a practice guide for the directors and personnel at all levels to abide by.

### **2. Objectives**

2.1 To ensure the directors and personnel at all levels perform their duties with integrity and primarily for the best interests of the Company and do not seek benefits from the Company for themselves or their related persons.

2.2 To prevent the devastating effects of corruption on economic stability and competitive potential of the Company and the country.

2.3 To promote the policy under the corporate governance principles and code of conduct of the Company.

### **3. Definitions**

“**The Company**” means Bangkok Commercial Asset Management Public Company Limited.

“**Board of Directors**” means the Board of Directors of the Company.

“**Directors**” mean directors of the Company.

2/ “**Top management...**”

**“Top management”** means president, senior executive vice presidents and executive vice presidents, including executives as defined in the Notification of the Securities and Exchange Commission Re: Determination of Definitions in Notifications Relating to Issuance and Offer for Sale of Securities.

**“Executives”** mean senior vice presidents of departments/offices, managers and vice managers of the Company.

**“Employees”** mean employees of Bangkok Commercial Asset Management Public Company as defined in the Articles of Association concerning Working of Employees of Bangkok Commercial Asset Management Public Company B.E. 2562, excluding the top management and executives.

**“Personnel at all levels of the Company”** mean top management, executives and employees.

**“Corruption”** means any form of bribery through an offer, promise, giving, assuring, request or acceptance of money, assets or other improper benefits to or from government officials, government agencies, private agencies or any persons in charge, whether directly or indirectly, to entice them to perform or refrain from performing their duties in order to acquire or retain business or introduce business particularly to the Company or to acquire or retain any other improper business benefits, unless otherwise permitted by laws, rules, notifications, regulations, local tradition or trade custom.

**“Any other benefits”** mean any benefits in the form of special privileges, money, assets or items given as a token of appreciation or rewards or to build a relationship between the giver and the recipient.

**“Bribery”** means an offer to give or receive money, items, gifts, presents, rewards or any other benefits for oneself or other persons as an inducement to perform any act which is dishonest, illegal or unethical.

**“Gifts”** mean money, assets or any other benefits exchanged to show courtesy, which shall also include money, assets or any other benefits given as a reward or in gratuitous favor or as assistance or as a token of appreciation, granting of special offers which are not those reserved for the general public to obtain a discount price on property, or granting of special offers for services or entertainment, or provision of expenses for travel or trip, lodging, meals or any other similar favors, whether in the form of coupons, tickets or any other evidences and whether by advance payment or by reimbursement.

**“Normal tradition”** means a festive occasion or special day probably with mutual gift-giving, which shall include an occasion to express congratulations, thanks, welcome, condolences or to give assistance in line with social etiquette.

#### **4. Guidance on Anti-Corruption**

The Company adopts the anti-corruption policy by prohibiting the directors and personnel at all levels of the Company from tolerating corruption in all forms, whether directly or indirectly, such as giving or accepting money, gifts, presents or any other benefits in bad faith, including improper entertainment from business-related parties such as customers, debtors, creditors, counterparties, cooperation partners, business partners, and other

stakeholders. The Company also ensures that a review of compliance with the anti-corruption policy is regularly made at least on a yearly basis (see details in Annex 2), and requires that its directors and personnel at all levels must abide by the following practice guide:

4.1 Perform duty in accordance with the anti-corruption policy and code of conduct of the Company, and do not involve in any form of corruption, whether directly or indirectly.

4.2 Assist in monitoring corrupt practices whereby if any corrupt act is discovered or detected, the person committing such corruption, irrespective of his/her position, shall be subject to the same punishment by the Company.

4.3 Do not overlook or ignore any witnessed or known corruption related to the Company, whereas one is duty-bound to report such corruption to his/her supervisor or to the person in charge and cooperate in the investigation.

4.4 Do not unfairly and unlawfully perform any transaction by conniving, directly or indirectly, with any government official, other person or other agency, and do not have any other hidden benefits, directly or indirectly, of oneself, one's family and ally of the Company, including transactions such as sales of products and services to the Company or in competition with the Company.

4.5 Avoid accepting any improper entertainment from those related to the Company or from other persons who may gain an advantage through the performing of duty by the Company's employees.

4.6 Do not offer or accept money, gifts, presents, rewards or any other benefits for a reciprocal exchange of favors or business advantages of all kinds, and ensure that business operation of the Company and contact with the government sector are carried out with transparency, integrity and honesty and in compliance with the applicable laws.

## **5. Reporting of Corruption**

5.1 The Company has in place an efficient and transparent operational system to ensure reliability of its financial reporting, and closely and regularly monitors the possibility of corruption risk in its operation.

5.2 Any employee who has witnessed any corrupt practice within his/her work unit must report such matter to his/her supervisor or report clues about such corruption through the channels designated by the Company, and shall abide by the Corporate Governance Code and the Code of Conduct of the Company.

5.3 The Company will ensure fairness and protection of both the complainant/whistleblower and the alleged wrongdoer on an equitable basis by implementing protective measures for the employee/whistleblower who has reported any corruption related to the Company. The Company will also protect the employee who denies such offence/who cooperates in reporting corruption as set forth by the Company in the procedures for complaint handling

4/ and whistleblowing...

and whistleblowing for employees and customers/outside parties (see details in Annex 3 and Annex 4).

5.4 The Company provides channels for complaints/whistleblowing for employees and customers/outside parties who have witnessed any corrupt practices related to the Company with the objective to establish procedures for handling complaints until the final outcome is reached, ranging from investigation, improvement/revision in management aspect in a concrete manner to reporting of complaint handling results to the Corporate Governance and Social Responsibilities Committee (CG Committee) (see details in Annex 5).

5.5 Any of the directors and personnel at all levels of the Company who have committed any corruption shall be deemed violating the Company's code of conduct and, hence, shall be subject to disciplinary punishment according to the Company's regulations as well as legal punishment if such act also violates the law.

## 6. Other Guidelines

6.1 This anti-corruption policy shall extend to all activities relevant to the Company's operation.

6.2 A corruption risk assessment shall be regularly conducted across the organization on a yearly basis.

6.3 The directors and personnel at all levels of the Company must perform their duties with due care regarding the guidelines on giving or receiving of money, gifts, presents or any other benefits (see details in Annex 1).

6.4 A charitable donation, giving of money or items for sponsorship, and giving/receiving of money or items for charitable donation and money or items for sponsorship must be made transparently and lawfully, and it must be ensured that such money or items donated and money or items for sponsorship are not used as a bribe (see details in Annex 6, Annex 7 and Annex 8).

6.5 In conducting its business, the Company must remain politically neutral and must not provide any political support or involve in and take sides with any political party, or any person with political power must not use the Company's funds or resources to support, whether directly or indirectly, any political party or politician.

6.6 In building business relationship and executing procurement/hiring, the Company must not give bribes for any conduct of business of all types with business partners, counterparties, government agencies or agencies doing business with the Company, and must embrace transparency and compliance with the applicable laws.

6.7 The Company must develop and instill good conscience in the directors and personnel at all levels of the Company so that they are aware and perform their duties with integrity and do not seek benefits from their positions or offer any favor to other persons. Any of the directors and personnel at all levels of the Company who have committed corruption shall be punished in any case whatsoever, regardless of the amount of money involved in such corruption.

5/ 6.8 The Company...

6.8 The Company must give importance to the dissemination and promotion of knowledge and understanding among both the persons involved with the Company and the stakeholders of the Company for the development of good conscience.

Any other actions relevant to corruption shall be subject to compliance with this anti-corruption policy as well as the Corporate Governance Code and the Code of Conduct of the Company, the policy or practice guidelines towards all groups of stakeholders, and the regulations, orders, operational handbooks and working procedures, both existing and/or to be amended in the future.

Given on April , 2020.

(Mrs. Tongurai Limpiti)

**Chairperson**

Organization Development and Risk Management Department

Tel. (02) 267-1900 Ext. 2801

**Annexes**

1. Guidelines on Giving or Receiving of Money, Gifts, Presents or Any Other Benefits
2. Procedures for Compliance with the Anti-Corruption Policy
3. Procedures for Complaint Handling/Whistleblowing for Employees
4. Procedures for Complaint Handling/Whistleblowing for Customers/Outside Parties
5. Complaint/Whistleblowing Channels
6. Procedures for Cash or In-Kind Sponsorship
7. Procedures for Charitable Donation
8. Procedures for Disposal of Unused Supplies of the Company (Charitable Donation)

**Annex 1****Guidelines on Giving or Receiving of Money, Gifts, Presents or Any Other Benefits**

To establish good business norms, the Company has formulated the Guidelines on Giving or Receiving of Money, Gifts, Presents or Any Other Benefits, thereby requiring that the directors and personnel at all levels of the Company must not solicit and accept money, gifts, presents or any other benefits in bad faith, including improper entertainment from business-related parties such as customers, debtors, creditors, counterparties, cooperation partners, business partners, and other stakeholders, insofar as this could influence the works and business decisions of its personnel and have consequences for the Company's image. The Company has also developed and instilled good conscience in the directors and personnel at all levels of the Company so that they are aware and perform their duties with integrity and do not seek benefits from their positions or offer any favor to other persons.

**1. Receiving of Money, Gifts, Presents or Any Other Benefits**

For the prevention of corruption, the directors and personnel at all levels of the Company are prohibited from soliciting money, gifts, presents or any other benefits from business-related parties such as customers, debtors, creditors, counterparties, cooperation partners, business partners, and other stakeholders, unless where it is a usual festive or traditional occasion. In this respect, the Company stipulates that personnel at executive level or higher shall represent the Company in accepting money, gifts, presents or any other benefits, including gifts received during traditionally accepted festive occasions, and, if any such executive is not available, he/she may assign an employee to accept the money, gifts, presents or any other benefits on his/her behalf.

In accepting money, gifts, presents or any other benefits of value exceeding the threshold determined in the notification of the National Anti-Corruption Commission (NACC), which is a maximum of Baht 3,000 (and/or the NACC notification to be amended in the future), the relevant executive and employee shall act as follows:

- He/She must report this to his/her supervisor as soon as possible, using the Form of Conflict of Interest Disclosure Report (under the subject 'Receiving of Money, Gifts, Assets or Any Other Benefits from Performing of Duty').
- The supervisor shall make a decision and give an instruction and then inform the reporting employee of the said decision and instruction in order to take action as so decided.
- The original copy of the Form of Conflict of Interest Disclosure Report of the executive and

employee shall be kept by the owner unit, with a copy thereof to be forwarded to the Organization Development and Risk Management Department for compilation and further submission to the CG Committee and the Board of Directors in accordance with the policy established by the Company.

## **2. Giving of Money, Gifts, Presents or Any Other Benefits**

Giving of money, gifts, presents or any other benefits is allowed during the usual festive or traditional occasions. The said money, gifts, presents or any other benefits shall be procured by the Company in accordance with the Company's procurement regulations.

To avoid this from giving rise to bribery and safeguard against corruption, the Company stipulates that personnel at executive level or higher shall represent the Company in giving money, gifts, presents or any other benefits, including gifts given during traditionally accepted festive occasions, and, if any such executive is not available, he/she may assign an employee to give the money, gifts, presents or any other benefits on his/her behalf.



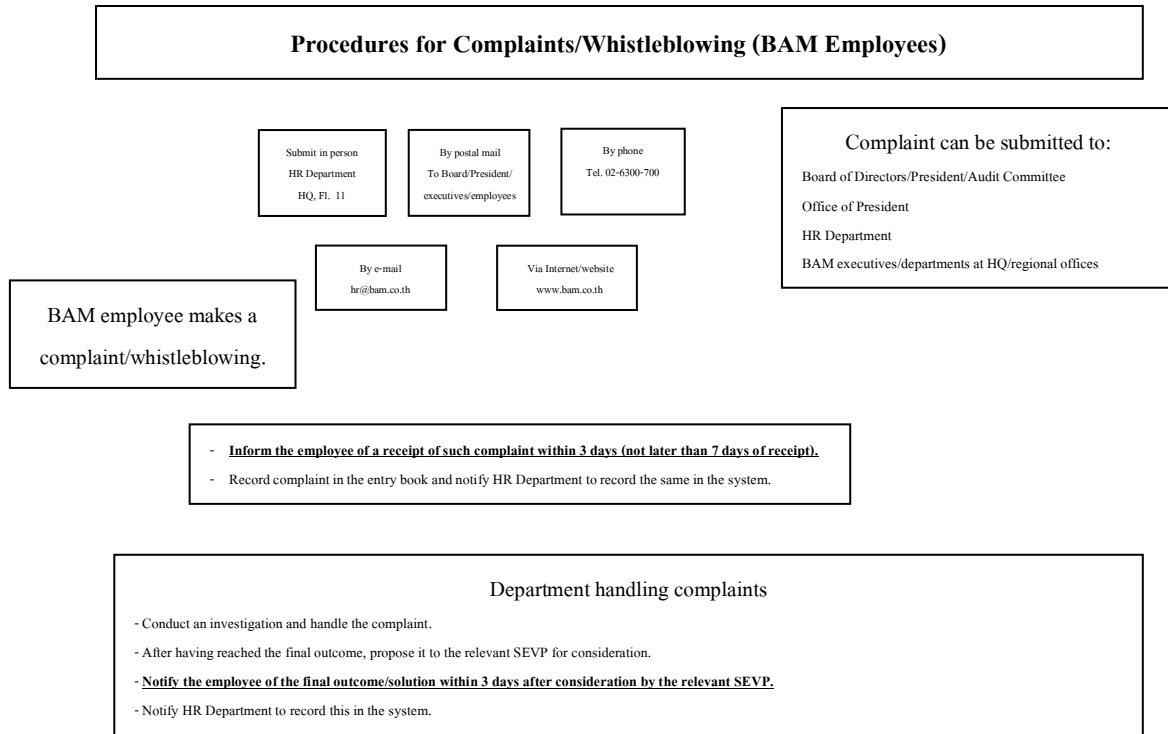
**Annex 2**

**Procedures for Compliance with the Anti-Corruption Policy**

Explanation	Procedures						
<p>1. The Board of Directors and top management demonstrate their commitment to the anti-corruption policy by designating the Board Chairperson to sign the declaration of intent to join Thailand’s Private Sector Collective Action Coalition Against Corruption (CAC).</p> <p>2. The Board of Directors appoints:</p> <p>    2.1 The Audit Committee to review the “Form of Self-Evaluation Tool for Anti-Corruption Measures with 71 Indicators.”</p> <p>    2.2 The Corporate Governance and Social Responsibilities Committee (CG Committee) to review the Code of Conduct (COC) in alignment with the “Anti-Corruption Measures.”</p> <p>    2.3 The Risk Oversight Committee to review/evaluate risk concerned with prevention of corruption.</p> <p>3. The Audit Committee reviews the Form of Self-Evaluation Tool with 71 Indicators and seeks the Board of Directors’ approval to apply for certification by the CAC Committee.</p> <p>4. The top management communicates the anti-corruption policy to the executives and personnel at all levels of the Company and sets out a practice guide for demonstration of commitment and evaluation method to reflect results of operation.</p> <p>5. The Company ensures a follow-up and evaluation on the anti-corruption measures are regularly conducted on a yearly basis.</p>	<div style="text-align: center; border: 1px solid black; width: fit-content; margin: 0 auto; padding: 5px;"><b>Start</b></div> <div style="border: 1px solid black; padding: 10px; margin: 10px 0;"> <p style="text-align: center;">The Board of Directors resolves to approve the plan for renewal of membership of “Thailand’s Private Sector Collective Action Coalition Against Corruption (CAC).”</p> </div> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 33%; padding: 5px;">Audit Committee</th> <th style="width: 33%; padding: 5px;">CG Committee</th> <th style="width: 33%; padding: 5px;">Risk Oversight Committee</th> </tr> </thead> <tbody> <tr> <td style="padding: 5px; vertical-align: top;"> <p>Review the “Form of Self-Evaluation Tool for Anti-Corruption Measures with 71 Indicators.</p> </td> <td style="padding: 5px; vertical-align: top;"> <p>Review the Code of Conduct (COC) in alignment with the “Anti-Corruption Measures.”</p> </td> <td style="padding: 5px; vertical-align: top;"> <p>Review/evaluate risk concerned with prevention of corruption.</p> </td> </tr> </tbody> </table> <div style="border: 1px solid black; padding: 10px; margin: 10px 0;"> <p>The Audit Committee reviews the “Form of Self-Evaluation Tool with 71 Indicators” and seeks the Board of Directors’ approval to apply for certification by the CAC Committee.</p> </div> <div style="border: 1px solid black; padding: 10px; margin: 10px 0;"> <p>The top management communicates the anti-corruption policy to the executives and personnel at all levels of the Company and sets out a practice guide for demonstration of commitment and evaluation method to reflect results of operation.</p> </div> <div style="border: 1px solid black; padding: 10px; margin: 10px 0;"> <p>The Company ensures a follow-up and evaluation on the anti-corruption measures are regularly conducted on a yearly basis.</p> </div> <div style="text-align: center; border: 1px solid black; width: fit-content; margin: 0 auto; padding: 5px;"><b>End</b></div>	Audit Committee	CG Committee	Risk Oversight Committee	<p>Review the “Form of Self-Evaluation Tool for Anti-Corruption Measures with 71 Indicators.</p>	<p>Review the Code of Conduct (COC) in alignment with the “Anti-Corruption Measures.”</p>	<p>Review/evaluate risk concerned with prevention of corruption.</p>
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**Annex 3**

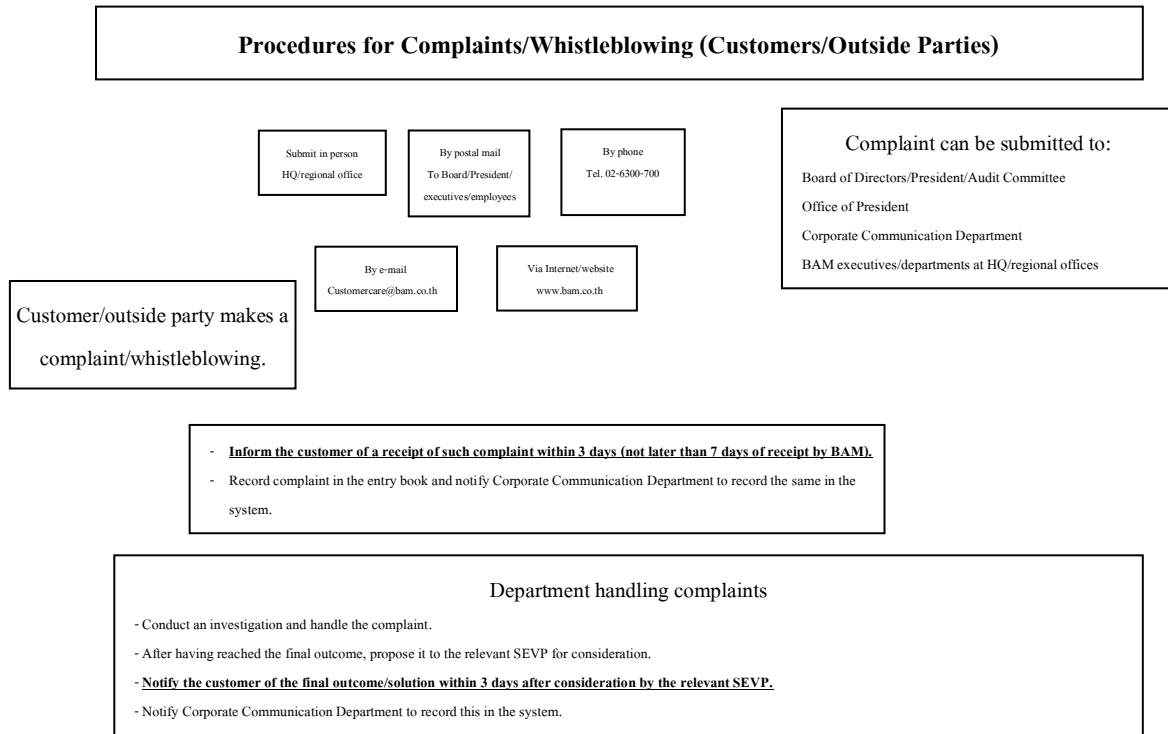
**Procedures for Complaint Handling/Whistleblowing for Employees**



An employee can make a complaint/whistleblowing through postal mail, e-mail, in person, by phone/fax and others to any of the designated persons who will notify the employee of a receipt of such complaint within three days (not later than seven days after the receipt date). The Company will then investigate into the matter in accordance with the regulations and procedures for complaints/whistleblowing within an appropriate time period with transparency and fairness to all parties. In this respect, the Company will protect and keep in strict confidence name of the complainant/whistleblower both before and after the process, and will notify the investigation result to the complainant/whistleblower promptly after completion of the process.

**Annex 4**

**Procedures for Complaint Handling/Whistleblowing for Customers/Outside Parties**



A customer/an outside party can make a complaint/whistleblowing through postal mail, e-mail, in person, by phone/fax, via the Internet/website, and others to any of the designated persons who will notify the customer/outside party of a receipt of such complaint within three days ( not later than seven days after the receipt date). The Company will then investigate into the matter in accordance with the regulations and procedures for complaints/whistleblowing within an appropriate time period with transparency and fairness to all parties. In this respect, the Company will protect and keep in strict confidence name of the complainant/whistleblower both before and after the process, and will notify the investigation result to the complainant/whistleblower promptly after completion of the process.

## Annex 5

## Complaint/Whistleblowing Channels

Complaint/Whistleblowing Channels			
Channels	Employee	Customer/ Outside Party	Complaint/Whistleblowing Can Be Submitted to (specify e-mail/address)
1. Board of Directors	/	/	phongsathon@bam.co.th (Company Secretary) Bangkok Commercial Asset Management Plc. No. 99 Surasak Road, Silom, Bang Rak, Bangkok 10500
2. President	/	/	sompom@bam.co.th (President) Bangkok Commercial Asset Management Plc. No. 99 Surasak Road, Silom, Bang Rak, Bangkok 10500
3. BAM executives	/	/	Bangkok Commercial Asset Management Plc. No. 99 Surasak Road, Silom, Bang Rak, Bangkok 10500
4. Office of the President	/	/	ops@bam.co.th Bangkok Commercial Asset Management Plc. No. 99 Surasak Road, Silom, Bang Rak, Bangkok 10500
5. HR Department	/		hr@bam.co.th Bangkok Commercial Asset Management Plc. No. 99 Surasak Road, Silom, Bang Rak, Bangkok 10500
6. Internal Audit Department	/		internalaudit@bam.co.th Bangkok Commercial Asset Management Plc. No. 99 Surasak Road, Silom, Bang Rak, Bangkok 10500
7. Audit Committee		/	auditcom@bam.co.th Bangkok Commercial Asset Management Plc. No. 99 Surasak Road, Silom, Bang Rak, Bangkok 10500
8. Corporate Communication Department (Customer Relations)		/	customercare@bam.co.th Bangkok Commercial Asset Management Plc. No. 99 Surasak Road, Silom, Bang Rak, Bangkok 10500
9. http://www.bam.co.th		/	Bangkok Commercial Asset Management Plc. No. 99 Surasak Road, Silom, Bang Rak, Bangkok 10500

**Annex 6**

**Procedures for Cash or In-Kind Sponsorship**

Explanation	Procedures
<p>1. The “Board of Directors” considers and approves a yearly budget.</p> <p>2. When there is a written request from any external organization for the Company’s sponsorship for an event or activity, the “Corporate Communication Department” preliminarily determines whether:</p> <p style="padding-left: 20px;">2.1 The event or activity is consistent with the action plan and is within the approved budget framework of the Company; or</p> <p style="padding-left: 20px;">2.2 The event or activity is beneficial to the whole of society and does not breach the moral principles of society; or</p> <p style="padding-left: 20px;">2.3 The event or activity is relevant to the Company’s transaction; or</p> <p style="padding-left: 20px;">2.4 The event or activity helps to promote the Company’s image.</p> <p>3. The “Corporate Communication Department” assesses the worthiness and benefit obtainable by the Company by comparing with the previous sponsorships granted to other organizations, and then proposes the matter for approval by the authorized person (department head level or higher).</p> <p>4. The authorized person (department head level or higher) considers the reason for and appropriateness of granting the sponsorship to the organization submitting such request, and ensures that the sponsorship is provided to a broad variety of recipients and is not concentrated on any particular organization.</p> <p>5. After obtaining the approval from the authorized person (department head level or higher),</p> <p style="padding-left: 20px;">5.1 If it is a request for cash, the “Corporate Communication Department” submits the request to the person authorized to approve a payment.</p> <p style="padding-left: 20px;">5.2 If it is a request for items, the “Corporate Communication Department” procures the requested items in accordance with the Company’s regulations.</p> <p>6. The “Finance Management and Finance Department” processes the payment for the “Corporate Communication Department” to further deliver to the sponsored organization.</p> <p>7. The “Finance Management and Finance Department” records this in the account according to the departmental process.</p> <p>8. The “Corporate Communication Department” collects supporting document/receipt from the sponsored organization, and forwards it to the “Finance Management and Finance Department” for recording in the account and keeping as evidence.</p>	<div style="text-align: center; border: 1px solid black; width: fit-content; margin: 0 auto; padding: 5px;">Start</div> <div style="border: 1px solid black; padding: 10px; margin: 10px 0;"> <p style="text-align: center;"><b>Board of Directors</b></p> <hr/> <p style="text-align: center;">Consider and approve a yearly budget.</p> </div> <div style="border: 1px solid black; padding: 10px; margin: 10px 0;"> <p style="text-align: center;"><b>Corporate Communication Department</b></p> <hr/> <ul style="list-style-type: none"> <li>- Assess the worthiness and benefit obtainable by the Company.</li> <li>- Seek approval from the authorized person (department head level or higher).</li> </ul> </div> <div style="border: 1px solid black; padding: 10px; margin: 10px 0;"> <p style="text-align: center;"><b>Finance Management and Finance Department</b></p> <hr/> <ul style="list-style-type: none"> <li>- Process the payment for the Corporate Communication Department.</li> <li>- Record this in the account.</li> </ul> </div> <div style="border: 1px solid black; padding: 10px; margin: 10px 0;"> <p style="text-align: center;"><b>Corporate Communication Department</b></p> <hr/> <ul style="list-style-type: none"> <li>- Collect supporting document/receipt from the sponsored organization, and forward it to the “Finance Management and Finance Department” for recording in the account and keeping as evidence.</li> </ul> </div> <div style="text-align: center; border: 1px solid black; width: fit-content; margin: 0 auto; padding: 5px;">End</div>

**Annex 7**

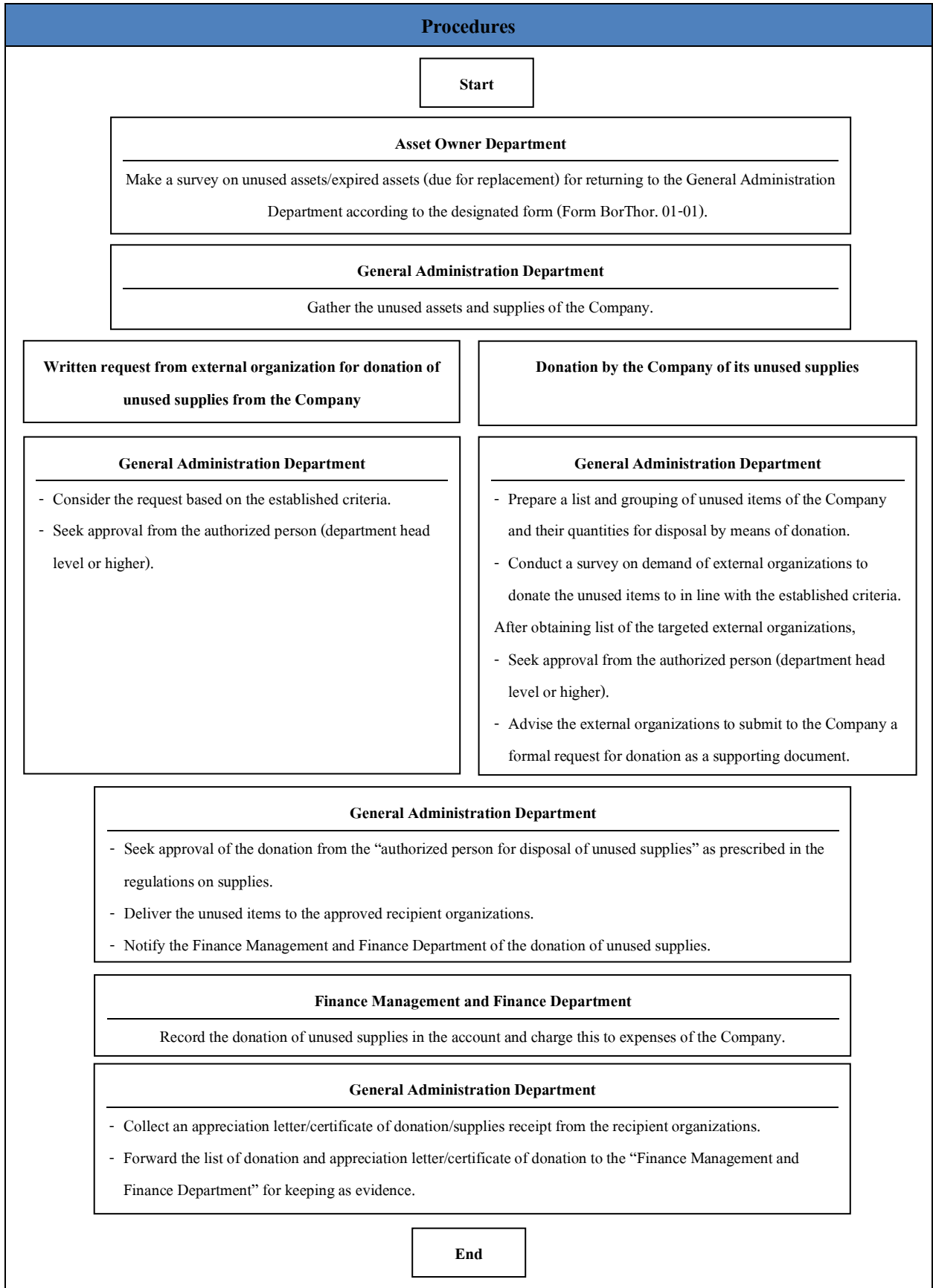
**Procedures for Charitable Donation**

Explanation	Procedures
<p>1. The “CSR Working Group” determines a yearly budget for charitable donation in line with the action plan, policy and business transactions of the Company, and proposes this to the “CG Committee” for approval.</p> <p>2. The “CG Committee” scrutinizes the action plan and gives its approval thereof.</p> <p>3. The “Board of Directors” considers and approves the yearly budget for charitable donation.</p> <p>4. When there is a written request from any external organization for charitable donation from the Company for an event or activity, the “Corporate Communication Department” preliminarily determines whether:</p> <p>4.1 The event or activity is consistent with the action plan and is within the approved budget framework of the Company; or</p> <p>4.2 The event or activity is beneficial to the whole of society and does not breach the moral principles of society; or</p> <p>4.3 The event or activity is relevant to the Company’s transaction; or</p> <p>4.4 The event or activity helps to promote the Company’s image.</p> <p>5. The “Corporate Communication Department” assesses the worthiness and benefit obtainable by the Company by comparing with the previous donations granted to other organizations, and then proposes the matter for approval by the authorized person (department head level or higher).</p> <p>6. The authorized person (department head level or higher) considers the reason for and appropriateness of granting the donation to the organization submitting such request, and ensures that the donation is provided to a broad variety of recipients and is not concentrated on any particular organization.</p> <p>7. After obtaining the approval from the authorized person (department head level or higher), the “Corporate Communication Department” submits the request to the person authorized to approve a payment.</p> <p>8. The “Finance Management and Finance Department” processes the payment for the “Corporate Communication Department” to further deliver to the recipient organization.</p> <p>9. The “Finance Management and Finance Department” records this in the account according to the departmental process.</p>	<div style="text-align: center; border: 1px solid black; width: 80px; margin: 0 auto; padding: 5px;">Start</div> <div style="border: 1px solid black; padding: 10px; margin: 10px 0;"> <p style="text-align: center;"><b>CSR Working Group</b></p> <hr/> <ul style="list-style-type: none"> <li>- Determine a yearly budget for charitable donation in line with the Company’s action plan, policy and business transactions.</li> <li>- Seek approval from the “CG Committee.”</li> </ul> </div> <div style="border: 1px solid black; padding: 10px; margin: 10px 0;"> <p style="text-align: center;"><b>CG Committee</b></p> <hr/> <p style="text-align: center;">Scrutinize the action plan and gives approval thereof.</p> </div> <div style="border: 1px solid black; padding: 10px; margin: 10px 0;"> <p style="text-align: center;"><b>Board of Directors</b></p> <hr/> <p style="text-align: center;">Consider and approve the yearly budget for charitable donation.</p> </div> <div style="border: 1px solid black; padding: 10px; margin: 10px 0;"> <p style="text-align: center;"><b>Corporate Communication Department</b></p> <hr/> <ul style="list-style-type: none"> <li>- Assess the worthiness and benefit obtainable by the Company.</li> <li>- Seek approval from the authorized person (department head level or higher).</li> </ul> </div> <div style="border: 1px solid black; padding: 10px; margin: 10px 0;"> <p style="text-align: center;"><b>Finance Management and Finance Department</b></p> <hr/> <ul style="list-style-type: none"> <li>- Process the payment for the Corporate Communication Department.</li> <li>- Record this in the account.</li> </ul> </div> <div style="border: 1px solid black; padding: 10px; margin: 10px 0;"> <p style="text-align: center;"><b>Corporate Communication Department</b></p> <hr/> <ul style="list-style-type: none"> <li>- Collect an appreciation letter/certificate of donation from the recipient organization, and forward it to the “Finance Management and Finance Department” for recording in the account and keeping as evidence.</li> </ul> </div> <div style="text-align: center; border: 1px solid black; width: 80px; margin: 0 auto; padding: 5px;">End</div>

10. The "Corporate Communication Department" collects an appreciation letter/certificate of donation from the recipient organization, and forwards it to the "Finance Management and Finance Department" for recording in the account and keeping as evidence.

**Annex 8**

**Procedures for Disposal of Unused Supplies of the Company (Charitable Donation)**





<b>Explanation</b>
<p>1. The “asset owner department” makes a survey on unused assets/expired assets (due for replacement) for returning to the “General Administration Department” according to the designated form (Form BorThor. 01-01).</p> <p>1.1 For general assets such as tables, chairs and filing cabinets, the “asset owner department” inspects and removes the data, documents and stuff completely from those assets before handing over to the “General Administration Department” for storage.</p> <p>1.2 For PCs, the “IT Department” deletes all users’ information from the computers before handing over to the “General Administration Department” for storage.</p> <p>Before donation, the “IT Department” will clone the computer’s HDD using the master hard disk for Window (OS) only and ensure all remaining data are deleted and all licensed software programs are uninstalled from the computers.</p> <p>2. The “General Administration Department” compiles a list of unused assets and supplies of the Company and preliminarily determinates appropriateness of the charitable donation based on the following criteria:</p> <p>2.1 It is a donation to government sector, state enterprises, temples, educational institutes and/or state educational institutions, and aims for public benefit; or</p> <p>2.2 It is an event or activity that is beneficial to the whole of society and does not breach the moral principles of society; or</p> <p>2.3 It is an event or activity that helps to promote the Company’s image.</p> <p>3. The disposal of unused supplies of the Company (charitable donation) is made in two cases:</p> <p><b><u>Case 1</u></b> <u>Written request from an external organization/person for donation of unused supplies from the Company</u></p> <p>The “General Administration Department”</p> <ul style="list-style-type: none"> <li>- considers the request based on the established criteria as described in Clause 2, and then seeks approval from the authorized person (department head level or higher).</li> <li>- after obtaining the approval from the authorized person (department head level or higher), proceeds with Clause 4 to Clause 9.</li> </ul> <p><b><u>Case 2</u></b> <u>Donation by the Company of its unused supplies</u></p> <p>The “General Administration Department”</p> <ul style="list-style-type: none"> <li>- prepares a list and grouping of unused items of the Company and their quantities for disposal by means of donation.</li> <li>- conducts a survey on demand of external organizations to donate the unused items to in line with the established criteria as described in Clause 2.</li> <li>- after obtaining list of the targeted external organizations, seeks approval from the authorized person (department head level or higher).</li> <li>- after obtaining the approval from the authorized person (department head level or higher), advises the external organizations to submit to the Company a formal request for donation as a supporting document.</li> </ul> <p>4. The “General Administration Department” seeks approval of the donation from the “authorized person for disposal of unused supplies.”</p> <p>5. After obtaining the approval from the “authorized person for disposal of unused supplies,” the designated procurement official (Asset Administration) sets a delivery date and delivers the unused items (for charitable donation) to the approved recipient organizations.</p> <p>6. The “General Administration Department” notifies the “Finance Management and Finance Department” in writing of the donation of unused supplies.</p> <p>7. The “Finance Management and Finance Department” records the donation of unused supplies in the account and charges this to expenses of the Company.</p> <p>8. The “General Administration Department” collects an appreciation letter/certificate of donation/supplies receipt from the recipient organizations.</p> <p>9. The “General Administration Department” forwards the list of donation and appreciation letter/certificate of donation to the “Finance Management and Finance Department” for keeping as evidence.</p>