

Anti-Corruption Policy

A A Electric Li Company Limited campaigns against corruption to personnel in the organization because the company's Board of Directors recognizes the importance of the anti-corruption. General contents have been contained in the company's Code of Conduct since the company prepared the Code of Conduct. Anti-corruption policy is to announce the company's intention to resist all forms of corruption and to aim that everyone in the organization understands about the anti-corruption under the same policy. In addition, the company's stakeholders acknowledge the company's intention seriously resisting the corruption.

Definition

Fraud or Corruption means using an authorized position or using the existing property unlawful for benefits of himself/herself, family, friend, acquaintance or other improper benefits causing caused damage to others' benefits such as giving bribe to an officer by solicitation, offer, giving or receiving bribe, giving promise in term of money, things, and other benefits, conflict of interest, fact concealment or any other benefits which are contrary to the moral and ethical responsibility of a government agency, private company or person who is directly or indirectly responsible to refrain from performing duties according to the defined principles.

Political assistance means giving money, property, any other benefits, or facilities (accommodation, reception place, meeting room, gathering place) to political parties, politicians, or people involving in politics to support the improper policy and action or any action contrary to the constitution which affect the community, society, and country as well as to encourage schism in society, whether directly or indirectly.

Anti-Corruption Policy

Prohibit directors, executives, employees, and workers of the company from doing any action involving with all forms of corruption for direct or indirect benefits of their own, family, friends, and acquaintances regardless of as the recipient, giver, or one who offers bribe both money or non-money to a government agency or private entity that the company conducts business or contact by complying with anti-corruption policy strictly.

Duties and Responsibilities

1. **The Board of Directors** has a duty to consider and approve policies and support anti-corruption policies in the company so that everyone in the company understands and recognizes the importance of the problems arising from the fraud and corruption, including the case that the audit reports the fraud affecting the company. The Board of Directors has a duty to provide advice, recommendations, penalty consideration, and finding a solution to the Managing Director.
2. **The Audit Committee has duties and responsibilities as follows:**
 - 2.1 Consider the anti-corruption policy received from the Managing Director to ensure that it is appropriate to the business model, company's environment, and corporate culture. And, propose to the Board of Directors for approval.
 - 2.2 Review the appropriateness of the change of anti- corruption policy received from the Managing Director, the Company Secretary. And, present to the Board of Directors for approval
 - 2.3 Review the audit report on internal control system and risk assessment on fraud according to the Internal Audit Department's proposal to ensure that such system has the least risk that may cause the chance of fraud affecting the financial position and the company performance, and the system is appropriate to the company's business model.
 - 2.4 Get the clue informing the corruption cause that employees in the organization involve and verify the informed facts. And, propose the issue to the Board of Directors to jointly consider or solve such problem.
3. **Internal Audit Department has roles and responsibilities as follows:**
 - 3.1 Perform in accordance with the approved internal audit plan and propose monitoring reports of the internal control system and risk assessment about the corruption caused by monitoring the internal control system to the Audit Committee for acknowledgement.
 - 3.2 Perform in accordance with the assignment by the Audit Committee regarding the fraud involving the organization in addition to the defined internal audit plan.

4. Managing Director has duty and responsibility as follows:

- 4.1 Define the anti-corruption policy to propose to the Audit Committee.
- 4.2 Communicate with personnel in the organization and related people to know about the anti-corruption policy.
- 4.3 Review the appropriateness of the anti-corruption policy to be suitable with the business change or legal requirements to submit to the Audit Committee.
- 4.4 Support the Audit Committee to find the fact as informed or the assigned work from the Audit Committee about the fraud investigation by delegating to the management team who can help investigate the fact.

Anti-corruption practices.

The Board of Directors, executives and employees of the company must comply with the anti-corruption policy and the business code of conduct strictly whether direct or indirect involvement by:

1. Do not act showing that a graft or bribery is taken to stakeholders directly or indirectly to obtain unlawful benefits. Must do as follows:
 - 1.1 Do not receive or give a gift, souvenir that is cash, cheque, bond, share, gold, jewel, real estate, or similar thing to related persons with whom one coordinates both in a government agency and private entity.
 - 1.2 Do not receive property, thing, gift, any present, or other benefits to induce the one's performance ignorance. Before receiving a gift, should check to make sure that the practice is in accordance with the law and regulations of the company. The thing or gift related to the work should be not expensive and appropriate in each occasion.
 - 1.3 Do not give a property, thing or any present, or other benefits to motivate in a decision or cause the recipient not to comply with the trade practices as other trade partners. The thing giving in several occasions must not have too high value.
 - 1.4 Must not an intermediary to offer money, property, thing, or other benefits to a business related person, government agency, or any organization in exchange of special undeserved right, or the ignorance cause of a government official not to comply with the rules and regulations and defined legal requirements.

2. In the procurement process, must do according to the rules of the company which are transparent and can be monitored
3. Spending for the business entertainment and other related costs associated with the business contract can be done. But, the expense must be reasonable and can be monitored.
4. Charitable contributions must do the followings:
 - 4.1 The use of money or the company's property for charity must be in the company's name only to a foundation, public organization, temple, hospital, healthcare place, or socially beneficial organization with trusted certificate which can be checked and processed through procedures and regulations of the company.
 - 4.2 Charitable donations in the private name can be done, but are not related to or cause doubts that it is the corruption for any benefits.
5. To support the funding, must do the followings the use of money or the company's property to support a project must specify the company name only. The objective of the paid fund must be the business objective, good image, and the company's reputation. Must indicate a clear objective to withdraw the fund, and there are proven evidence. Follow the procedures in accordance with the regulations of the company.
6. Do not do any action related to the internal politics of the company and do not use any of the company's resources to do so. The company is an organization that adheres to the political neutrality, supports the legal action and democracy including has no a guideline to provide political to any political party whether directly or indirectly.
7. If the action is found to be corrupt or fraud related to the company directly or indirectly, must not neglect or ignore such action and should notify the Managing Director or the Secretary of the company immediately or inform through the channel as defined in this policy.
8. Directors and executives must be aware of the importance in the knowledge distribution and advice for the understanding to the subordinates about the anti-corruption so that employees comply with this Anti-Corruption Policy including being the role model on honest, ethics, and code of conduct.

Notification information or fraud complaint.

1. See the corruption associated with the organization directly or indirectly such observation of the bribe/graft of people in the organization to officials of government agencies or private offices.
2. Find the misuse of procedures according to regulations of the company or have an impact on the company's internal control system that would cause a doubt about the corruption channel.
3. See the action that makes the company lose benefits and affect the reputation of the company.
4. See the actions that are illegal, immoral, and wrongful, and illegitimate to the business conduct.

Notification channel or fraud complaint.

The Board of Directors has delegated the Audit Committee to receive the clue information and complaint that might cause suspicion as corruption to the company directly or indirectly through the channels of complaint set forth in this policy. A complainant shall provide details of the clues or complaints with name, address and contact phone number and send to the clue channel as follows:

1. Notify via email of the Audit Committee at audit_committee@2008aal.com, or
2. Notify via email of the Managing Director, [patavit.mut @aal2008.com](mailto:patavit.mut@aal2008.com), or
3. Notify via the company's Web site, www.aal2008.com, or
4. Notify via telephone number 02-158-4576-77 ext. 100 (Company Secretary).
5. Notify via the notification box (located at the information board of the company).

If the informant or the complainant has a complaint regarding Managing Director or the Company Secretary, please send the complaint to the Audit Committee directly.

Those who can inform the clue or complaint about the fraud is every group of the company's stakeholders: shareholders, customers, partners, competitors, government, community, society, management and employees of the company. The company will maintain your confidentiality regardless of the above-mentioned methods.

Protection measures and confidentiality.

To protect the right of the complainant and the informant who act in good faith, the company will cover the name, address, or any information that could identify the complaints or informants and keep confidentiality of the information of the complainant and informant. Only the responsible persons who investigate the complaints can be accessible to such information.

In case that there is a complaint to Managing Director, the Audit Committee will protect the informant or complainant, witness, and the person providing the information for investigation not to be in harm, any danger, or injustice resulting from notifying the complaint, being the witness, or providing evidence by asking the complainant to send the complaint to the Audit Committee directly. Managing Director is responsible for ordering as appropriate to protect the informant or complainant, witness, and the person providing the information

To investigate the fact with no harm, danger, or injustice resulting from the clue information, complaint, witness, or information provider, Managing Director or the Company Secretary can assign any executive to act on behalf to order the safety protection of the informant, complainant, witness, and the information provider. The assigned executive must not be associated with the issue or complaint whether directly or indirectly (e.g., the accused is a direct own subordinate.).

Whereas, those who receive information from the duty related to the complaint have responsibility to maintain the information, complaint, and evidence of the complainant and information provider as confidential. Do not disclose the information to a third party who is not involved unless a disclosure obligation determined by law.

Investigation procedures and penalties.

1. When the clue is informed, Managing Director, the Company Secretary and the Audit Committee will scrutinize and investigate the fact.
2. During the investigation, Managing Director, the Company Secretary, and the Audit Committee shall assign a representative (Executive) to inform the progress periodically to the informant or complainant.
3. If the investigation finds that the information or evidence believably showing that the accused committed the actual fraud, the company will grant the accused's right to acknowledge the allegation, and the accused's right to defend himself by finding further information or evidence proving that the accused is not involved with the alleged and corrupted action.

4. If the accused has committed the actual fraud which is against the Anti-Corruption Policy and Code of Conduct of the company, must be considered disciplinary punishment in accordance with the defined regulations of the company. And, if the fraud is illegal, the offender may be punished by law.

Based on the disciplinary penalty in accordance with the regulations of the company, the Managing Director's decision is final. In case of the complaint to Managing Director, the Company Secretary or the Audit Committee is responsible for receiving the complaint, finding information, and checking the fact as informed to report to the Board of Directors to jointly consider and determine the punishment as appropriate.

Publicity of Anti-Corruption Policy.

To ensure that everyone in the organization is informed the Anti-Corruption Policy, the company will do the following actions:

1. The company will post the Anti-Corruption Policy at an obvious place where everyone in the organization can read it.
2. The company will make the Anti-Corruption Policy available via the company communication channels such as electronic mail (E-Mail), web site of the company, annual information disclosure report (56-1), and annual report (56-2).
3. The company will arrange the training on Anti-Corruption Policy to new employees.
4. The company will regularly review the Anti-Corruption Policy every year.