
Anti-Bribery and Corruption Policy
Krungthai Asset Management Public Company Limited

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Anti-Bribery and Corruption Policy

1. Principle

Krungthai Asset Management Public Company Limited is the only asset management company with a status as a “state-enterprise” with Krungthai Bank Public Company Limited as shareholder with 99.99%. We operate our business along the principles of good corporate governance with consideration for social responsibility and emphasis on anti-corruption as outlined by Krungthai Bank’s Anti Bribery and Corruption Policy. We operate our business with honesty, integrity, without negative impact on others, and transparently by adopting a principle of resisting all forms of corruption and bribery. Corruption is also against the law and KTAM follows a zero-tolerance rule.

2. Glossary of Terms

No.	Term	Description
1	Bribery	Asset or other benefits being proposed, promised, offered, accepted, or demanded in any way which sways a decision towards an action or inaction that violates laws or duty.
2	Corruption	Dishonesty through the use or stature of job title, authority, or personal influence for one’s own gain and/or someone else’s gain, including bias towards others, despotism, bribery, corruption, and other unfair practice which a person uses as a tool to circumvent fairness or justice upheld by society.
3	Asset	Property and intrinsic items of value and items which could be possessed such as cash, house, vehicles, etc.
4	Other benefits	Examples such as free lodging, debt refinancing or pardon, travel expenses, or job acceptance.
5	Employee	Company directors, management, and all types of staff.
6	Public official	Government officials, foreign government officials, officials of international organizations.

3. Scope of Enforcement

- 3.1 This policy document applies to the company and its employees.
- 3.2 This policy document applies to business partners, agents, intermediaries, advisors, other persons involved in the company's businesses activities, and persons representing the company. The policy will be enforced on these aforementioned persons to the extent that is possible and appropriate, with the same level of social responsibility upheld by the company.

4. Persons Responsible or Involved

- 4.1 This policy is approved by the company's Board of Directors.
- 4.2 Company directors and management has the duty to supervise, promote and ensure the genuine application of this policy on a continuous basis to prevent the giving or accepting of bribes and corruption which may arise from business dealings or other activities the company is involved in. They will also assist and support anti bribery and corruption among the company's business partners, agents, intermediaries, advisors, other persons involved in the company's businesses activities, and persons representing the company.
- 4.3 Every management executive has a duty to ensure that all of one's subordinates are aware and understands this policy document and given sufficient and regular training. Every management executive must act as a role model for employees in the resistance against bribery and corruption.
- 4.4 Employees must review the policy and conduct one's duty according to the policy guidelines. Any suspicion or witnessing of wrongdoing in violation of this policy should be reported to one's supervisor or through designated channels.
- 4.5 Business partners, agents, intermediaries, advisors, other persons involved in the company's businesses activities, and persons representing the company shall be treated by the company in accordance to this policy as well, starting from commencement of business relationship until thereafter, as appropriate. These parties are also expected to cooperate in conducting a status assessment or pledge against bribery and corruption.

5. Guidelines on Anti-Bribery and Corruption

- 5.1 Employees must comply with this policy and not become involved in giving or accepting bribes and corruption whether directly or indirectly.

- 5.2 Employees must not demand, provide or accept bribes for the benefit of oneself, company, anyone involved with the company, anyone involved with oneself regardless of whether immediate family, friends, or someone with any sort of connection to oneself.
- 5.3 Employees must not propose to give, promise to give, or actually give bribes to public officials or other private sector individuals to encourage them to act, refrain from taking action, or delay their action unethically or in violation of the law.
- 5.4 Anyone who discovers the potential of a bribery or corruption must report such case to one's superiors or to designated whistle blowing channels promptly.
- 5.5 The company will be fair and properly treat an employee who refuse to give or accept a bribe or corruption without demoting or punishing the employee, even though the outcome has resulted in a loss of business opportunity.
- 5.6 For business relationships and procurement, the giving or accepting of bribes to encourage business or effect procurement is prohibited. The company's business and all dealings must be conducted transparently, honestly, verifiable, and comply with applicable business laws and regulations.
- 5.7 All measures conducted according to this policy should follow the company's standard operating guidelines and any other procedures the company may establish to support this policy.

6. Activities Highly Vulnerable to Corruption Risks

The following activities are deemed highly vulnerable to bribery risks, hence require considerable caution and strict adherence to laws, regulations and applicable procedures.

6.1 Facilitation payments

Facilitation payments refer to small unofficial payments made to a public official where the giver may not intend to sway the public official's decision to take action, inaction, or delay a process through failure to properly perform his/her duty. The facilitation payment may have been intended to emphasize to the public official to move forwards and process the work according to standard procedures, or to expedite the process, whereby such process does not require the public official to cast a decision, is a process that the public official is already empowered to handle, and the work request is something which one is entitled to receive legally. Examples include license applications, request for official certificates, request for public services, etc.

The company does not have a policy to encourage facilitation payments. However, fast track process that are legal are acceptable if such services are widely open to all applicants or according to the scope permitted by laws of certain countries.

6.2 Hospitality expenditures and gifts

Hospitality expenditures and gifts are typically expenditures associated with corporate activities to foster relationships or, in some cases, a positive social gesture. Gifts may take many forms such as cash, items, services, store coupons, etc. Hospitality expenditures may include lodging and travel expenses to visit sites, training conferences, meals, etc.

The company does not have a policy to encourage coverage of hospitality expenses and gifts for the purpose of influencing the decision of public officials to breach their duty, nor the giving of bribes. As such, the providing of hospitality expenses and gifts must be reasonably valued and in-line with prevailing customs and traditions or social norms. Hospitality expenses and gifts must be approved and must follow the company's standard operating guidelines that apply. Expenditures incurred must be recorded and backed by receipts.

6.3 Charitable donations and contributions to political parties

Charitable donations represent part of the company's corporate culture to uphold social responsibility. However, charitable donations may be misused as a means of bribery. As such, charitable donations must be approved in accordance to company guidelines and conducted transparently, together with clear justification of the purpose of the donation. Charitable donations must not be made to disguise a bribery.

Donations to political parties may be a way of influencing politicians to abuse their power. Politicians are considered public officials. The company does not have a policy to give contributions or any company resources whatsoever to support a candidate's political campaign.

7. Payment Disbursements and Accounting

7.1 Payment disbursements to cover various activities must match actual expenses incurred, contain supporting evidence that can be audited, and recorded in proper chronological manner. Any expenses that require approval must properly follow standard operating procedures and company guidelines.

7.2 The cost of various activities must be properly entered in the correct accounting entries and can be verified. Accounts must be reviewed regularly to ensure compliance with standard company guidelines and financial accounting standards.

7.3 The company prohibits falsified accounting entries, violation of accounting principles, incomplete data, accounting manipulations, or off-the-book records since such expenses are customarily intended for illegal activities, including bribery.

8. Violation of Policy

8.1 The company will take disciplinary action against an employee who do not comply with this policy, including the immediate supervisor for negligence or inaction regarding the employee's misconduct. If the violation constitutes corruption in the workplace or a criminal offense that is intentional, the employee will be punished according to company regulations and employee code of conduct, job contract, or according to laws and regulations on job misconduct (as applicable).

8.2 If business partners, agents, intermediaries, advisors, other persons involved in the company's businesses activities, and persons representing the company do not have an anti bribery and corruption policy in place, the company shall classify such persons as high risk persons and will conduct a stringent Customer Due Diligence before the start of a business relationship.

9. Supervision, Monitoring and Auditing

9.1 The company shall arrange audits and assessment of internal control measures that are effective against bribery and corruption.

9.2 The company shall require this policy to be reviewed and updated as needed, or at least once a year, when there are changes to major factors such as legislation changes or new business regulations that are applicable.

10. This policy shall become effective as of 24 March 2017 onwards or until further notice.

"Important Notice: This document has been translated from Thai. If there is any inconsistency or ambiguity between the English version and the Thai version, the Thai version shall prevail."