

8: Anti-Corruption Policy

EGCO Group is strongly committed to prevent and resist any forms of corruption whether directly or indirectly. To ensure that the business activities which might be potentially involved to corruption will be carried out care and diligence, EGCO Group has established the “Anti-Corruption Policy” in a written document and enforced the Company itself as well as the Company’s subsidiaries to strictly adhere to the policy at all times. The mission is to promote and preserve the corporate culture that “Corruption is an unacceptable act in our business conduct whether it will be with the government or the private sector.”

Anti-Corruption Guidelines

1. The Board of Directors and employees at all levels must conform to anti-corruption policy and code of conduct. They must not get involved or participate directly or indirectly in corruption for the benefit of the company, their family, their acquaintances and themselves.
2. Giving or accepting gifts, hospitality or entertainment has to be done in an open and transparent manner.
3. Donations and sponsorship should be provided with a clear objective and in open and transparent manners. Such donation should be audited at any time. Political contribution must be transparent and in compliance with applicable laws and regulations.
4. Employees at all levels must refrain from soliciting bribes whether directly or indirectly to any government officials, government agencies, representatives from both government private sectors in order to favor each other’s benefits.
5. Employees at all levels must refrain from accepting bribes whether directly or indirectly from any government officials, government agencies, representatives from both government private sectors in order to obtain agreements or business contracts. The Company bases its procurement process on transparency and strict adherence to the Company’s regulations.
6. Employees at all levels are responsible for immediately notification of any wrongdoings or traces of malpractice to their supervisors or any person in charge as well as cooperating in the investigation. If there are any doubts or concerns, they shall seek consultation from with their supervisors or the responsible persons through various provided channels.

7. The Company must fairly treat and protect whistleblowers. Such employee must not suffer any demotions, penalties, or be affected in a negative way. The Company will strictly comply with the whistleblower protection policy as indicated in the Company's guidelines and directions for whistleblowing.
8. Any employee violating the anti-corruption policy is subject to disciplinary actions as prescribed in the Company's regulations and orders as well as be punished according to relevant laws and regulations.
9. The Company is well aware of effective communication and promotion of the anti-corruption policy and compliance aiming to educate and create understanding to the Board of Directors, employees and other concerned parties.

Scope of Responsibility

1. The Board of Directors is responsible for establishing and imposing policies as well as supervising to ensure that every executive and employee recognizes the importance of anti-corruption and instill it as a corporate culture.
2. The Corporate Governance and Social Responsibility Committee is entitled to screen and review the anti-corruption policy and practices, provide useful recommendations so as to put these policies into practice.
3. The Audit Committee is responsible for monitoring compliance with anti-corruption measures, review the current measures as well as relevant internal control system.
4. The President and senior executives are required to promote and support the anti-corruption policy and honest business operations. In addition, they must avoid any actions which might cause corruption or any violation. Also, they must act as a role model for all employees and relevant parties in following the Company's code of conduct.
5. The Good Corporate Governance Working Team is entitled to assess corruption risks and mitigation measures, prepare, review and revise the anti-corruption policy and practice to suit with current situations. Then, the Committee shall present these policy and practices to the Corporate Governance and Social Responsibility Committee for further consideration and endorsement as well as disseminate and communicate the approved policy for employees' acknowledgement.

6. The Internal Auditor is responsible for auditing and reviewing the business operations to ensure its compliance with the Company's practices, authority, regulations or any obligatory laws. The activities of the Internal Auditor is to ensure that the Company has put in place appropriate and adequate internal control systems to respond to impending risk of corruptions. The Internal Auditor, then, must make a report to the Audit Committee.