



Krungthai
กรุงไทย

Anti-Bribery and Corruption Policy

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Cluster Legal Compliance & Financial Crime

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Anti-Bribery and Corruption Policy

1. Principle

The Bank is determined to perform business with honesty, good faith, non-violence, and straightforward along with the principle of anti-corruption of all types. Bribery and corruption are illegal and the Bank will not tolerate such incident to take place (Zero Tolerance), and it will be following the Code of Conduct of the Bank.

This policy will supplement the Code of Conduct. It shall determine the procedure of the Bank in Anti Bribery and Corruption, notwithstanding the Bank shall comply relevant Law with the Anti Bribery and Corruption in Thailand and other countries that the Bank operates their business.

2. Definition

No.	Statement	Definition
1	Bribe	Property or any other benefit proposed to be given, promised to be given, to be accepted, or to be requested something that affects the decision in any manner that incentivizes to act, not act, or delay an act that is unlawful or illegal in order to obtain unlawful benefits.
2	Corruption	Corruption by using or relying on one's position and job, power or influence for one's personal benefits and/or the benefit of a third person, including discriminating against someone, nepotism, taking bribes and other forms of injustice that have been used to subvert justice and social legitimacy
3	Properties	Things and incorporeal objects, susceptible of having a value and of being appropriated, such as money, houses, and cars
4	Other Benefits	For example, giving a bribe, offering and receiving gifts, allowing someone to stay in a rental place for free, helping to pay off debts, taking someone on a trip, and hiring.
5	Bank Personnel	Committees, executives, all personnel and Bank employees
6	Government Officials	Government officials, foreign government officials, and international organization officers according to organic law on counter corruption
7	The Bank's Affiliates	Company or juristic partnership in the same group under Section 39 of the Revenue Code
8	Persons Related to the Bank's Business	A person or a group of persons who effects from business operation directly and indirectly or receives any benefits from mentioned operation, including business partner, representative, broker, counselors or related persons in other business of the Bank.

3. Scope of application

3.1 This policy applies to the Bank and its personnel.

3.2 This policy applies to the Bank's affiliates. Each company in the Bank's affiliates will take this policy under consideration and promulgate it as prescribed procedures.

3.3 This policy applies to those who are involved in the Bank's business or acting on behalf of the Bank. This will be applied to such persons in accordance with this policy as far as possible and appropriate, and they will adhere to the same social responsibility standards as the Bank.

4. Related or Responsible Person

4.1 This policy is approved by the Board of Directors of the Bank.

4.2 Directors and executives are responsible for actively and continuously controlling, supporting, and driving the implementation of this policy to prevent the receipt or giving of bribes and corruption that may arise from the Bank's business processes or other processes related to the Bank. The Bank's affiliates are required to provide assistance and support to anti-bribery and anti-corruption actions, including providing assistance and support to anti-bribery and anti-corruption actions to the Bank's affiliates and those who are related to the Bank's business or acting on behalf of the Bank.

4.3 All executives have the responsibility of ensuring that their own subordinates will realize and comprehend this policy by taking sufficient and constant training, and performing their duty as a model to personnel in the anti-bribery and corruption.

4.4 The Bank's personnel will study and perform their duties in conformance with this policy. In the event that there is suspicion or experience of disobeying this policy, it shall be reported to the supervisor or through the channel of reporting as prescribed.

4.5 Representatives of the Bank who are appointed to serve as directors of the Bank's affiliates are responsible for communicating this policy to ensure that the Bank's affiliates have the same standards of conduct as the Bank.

4.6 Related persons with the Bank's business or acting on behalf of the Bank will be treated by the Bank in accordance with this policy from the beginning of the business relationship and subsequently as appropriate. These people must cooperate in checking the status or pledge against accepting or giving bribes and corruption.

5. The Process of the Anti-Bribery and Corruption

5.1 The Bank personnel and the Bank's affiliates will follow this policy and must refrain from involving with bribery and corruption, either directly or indirectly.

5.2 The Bank personnel and the Bank's affiliates will not request bribery for their own benefits or the Bank benefits, or benefit for any person related to the Bank or related to such personnel, whether his/her family members, friends or any related persons in other manner.

5.3 The Bank personnel and the Bank's affiliates will not offer to give, promise to give or deliver bribery to the government official or other private sector official, for persuading to do, not to do any act or to delay the doing of any act contrary to one's own duty or law.

5.4 After any person experiencing an act, which is within the scope of bribery and corruption, such person will inform the supervisor of a related business unit or channel of Whistleblowing immediately.

5.5 The Bank shall take into account the fairness and protect, rather than demote, punish, or penalize, personnel who refuse bribery and corruption, even if such actions may result in the Bank losing any business opportunity.

5.6 Any procedures under this policy will follow the practical guideline as prescribed in Business Code of Conduct, Good Corporate Governance Policy, including regulations and related Operation Manual of the Bank and any other process which is prescribed, as appropriate, by the Bank according to this policy.

6. Guideline for Anti Bribery and Corruption in Procurement Practice

In any business relationship and procurement, it shall be no bribery for operating business and procurement. Furthermore, Bank operation shall be transparent, trustworthy, verifiable and under related law and regulations.

However, during the procurement process, including before offering prices, during offering prices, and after the completed procurement agreement, the Bank personnel and involved business parties with the Bank shall not provide, offer, or affirm to grant a bribe, or act in any other way to persuade any person to cooperate in business, directly or indirectly. The aforementioned actions result in providing benefits in the offering price process, price dealing in the offering price process to government sectors, which brings some advantages in the procurement process or contracts, or receiving any benefits that are inappropriate according to the Code of conduct. Nevertheless, if someone acknowledges any unsuitable actions related to bribery and corruption in procurement, he or she should inform the supervisor, related department, or whistleblowing immediately.

Furthermore, the Bank also communicates and publicizes anti-bribery and corruption in procurement policies to its personnel and involved business parties with the Bank, for example, announcements, training courses, broadcasting through the media, and supporting personnel to participate in external training.

7. Precautionary Actions in the Case when there is High-Risk Opportunity of Bribery

The following actions are high-risk actions of bribery which need a precaution and follow the related law, rules and regulations strictly.

7.1 Facilitation Payment

Facilitation Payment means small amount of money that paying to government officer unofficially which giver has no intention to pay such money to officer to do, not to do any act or to delay the doing of any act contrary to one's own duty, but it is for ensuring that government officer will perform his/her process or encourage them to make the process

quicker, and such process is not rely on government officer's discretion and it is legal act of such government officer, and its right will be performed under applicable law such as request for license, request for certificate and getting public service.

The Bank has no policy to give support to facilitation payment. However, a legally express process is acceptable on condition that such process opens for all persons or follows the scope of law of some countries.

7.2 Hospitality Expenditures and Gifts

Hospitality expenditures and gifts are payment for the activities of a legal entity to build good relationships or, on occasion, as an expression of social etiquette. The gifts may come in a variety of forms, such as money, goods, services, gift certificates, etc. may include accommodation, fare for visiting the establishment or study visit, food and beverage expenses, etc.

The Bank does not intend to pay hospitality expenditures and gifts to incentivize government officials to commit unlawful acts and pay bribes. Therefore, the value or price of hospitality expenditures and gifts must reflect reasonableness and be spent as necessary to reflect customs, traditions, culture, or social etiquette. Payments for hospitality expenditures and gifts must be approved and in accordance with the Bank's relevant regulations. The actual expenses are recorded and paid according to the receipts.

7.3 Charitable Donations and Supports

Charitable Donations is the part of corporate culture of the Bank to support community but Charitable Donations may be the method of bribery. Therefore, such Charitable Donations shall be approved as prescribed by the Bank with transparency, including clarifying the purpose of donation. In addition, there must be no donations made to cover the bribery.

Any contribution of money or property or any other benefit must have a clear purpose; the value or price given must be reasonable, and the contribution must not be a bribe or to cover up a bribe.

7.4 Donations to Political Parties

Donations to support political parties may motivate persons holding political positions, who are government officers, to perform illegal duty actions. The Bank has no policy to take funds or properties of the Bank for supporting candidates of political activities.

8. Hiring of Government Officials

8.1 Hiring of Government Officials

In the event that a government official is hired to take part in the administration or work for the Bank, it must not be an employment of the said government official in return for the acquisition of any benefits from the Bank.

8.2 Disclosure of information about the hiring of government officials

Information regarding the hiring of government officials who are working for the Bank in a position of group head or above, or equivalent position under other names, is disclosed on the Bank's website for transparency and accountability.

9. Withdrawal and Bookkeeping

9.1 The reimbursement of expenses for various activities must be disbursed according to actual costs. The expenses must have verifiable evidence and be recorded at the correct actual time. If there are any expenses that need to be approved, they must go through the process as specified by the Bank and in accordance with the Bank's regulations.

9.2 Expenses incurred from transactions must have accurate, complete, and verifiable account records. In addition, the record must be reviewed regularly to be consistent and in accordance with the Bank's regulations and the Financial Reporting Standards.

9.3 The Bank does not allow data recording that is false, inaccurate, incomplete, or manipulation of accounts, including off-the-book records, because expenses recorded off-the-book are often used for illegal purposes. This includes bribery.

10. Policy Violations

10.1 The Bank will take disciplinary action against the Bank's personnel who violate this policy, including direct supervisors who neglect the commission of an offense or are aware of such offenses without properly dealing with them. If such policy violations constitute corruption on their own duty or the intentional commission of a crime, that person shall be punished with expulsion, dismissal, or discharge depending on the severity of the case.

10.2 In case any parties involving in business with the Bank or acting on behalf of the Bank do not comply with the anti-bribery and corruption policy, the Bank must classify such individuals as high-risk and perform extensive customer due diligence prior to accepting business.

11. Supervision, Monitor and Review

11.1 The Bank shall examine and evaluate the appropriate internal control measures in terms of the anti-bribery and corruption.

11.2 The Bank shall provide for the review and amendment of this policy as deemed appropriate, or at least every year if there are significant changes in factors such as changes in laws or relevant business standards.

12. Transitory Provision

In the event of the promulgation or amendment of laws and/or regulations of official authorities, all relevant agencies must strictly comply with the laws and/or rules and regulations of the official authorities that have been announced immediately.

