



**Krungthai**  
กรุงไทย

# **Anti-Bribery and Corruption Policy**

Enforced by Bank Order No. 1915/2567 (2024)

Effective Date: December 17, 2024

Overseas Branches Compliance Supervision and

EEC Project Regulations Department

Cluster Legal Compliance & Financial Crime

## Table of Content

Topic	Page
1. Principle	3
2. Definition	3
3. Scope of application	4
4. Roles and Responsibilities	4
5. The Process of the Anti-Bribery and Corruption	4
6. Guideline for Anti Bribery and Corruption in Procurement Practice	5
7. Precautionary Actions in the Case when there is High-Risk Opportunity of Bribery	5
8. Hiring of Government Employee	7
9. Withdrawal and Bookkeeping	7
10. Policy Violations and Penalties	7
11. Supervision, Monitor and Review	7
12. Communication & Training	8
13. Transitory Provision	8

## Anti-Bribery and Corruption Policy

### 1. Principle

The Bank is determined to perform business with transparency, honesty, good faith, good governance, and straightforward, along with following the principles of anti-corruption of all types. The giving and accepting of Bribery and Corruption and any form of fraudulent activities are strictly prohibited and will not be tolerated (Zero Tolerance). These principles are clearly outlined in the Bank's Code of Conduct.

This Anti-Bribery and Corruption Policy (**Policy**) is an integral part of the Bank's Code of Conduct outlining the Bank's approach in the prevention and combating of Bribery and Corruption in which the Bank's executives and employees are determined to strengthen a zero-tolerance culture and foster the five organizational DNAs – integrity, breakthrough, efficiency, social, and teamwork – which will continue driving Krungthai Bank toward becoming a moral organization and as such, the acceptance and giving of gifts, facilitation payments, hospitality expenditures, donations including sponsorship must be in line with the Bank's internal regulations on Anti-Bribery and Corruption.

Furthermore, the Bank adheres to all applicable anti-bribery and corruption laws in Thailand and in every jurisdiction where it operates.

### 2. Definition

No.	Term	Definition
1	<b>Bank</b>	Krungthai Bank Public Company Limited.
2	<b>Bribery</b>	Any Property or any Other Benefit, whether given, offer, promise to give, accept, willing to accept, or request, directly or indirectly (including given through intermediaries such as spouses, both registered and unregistered, relatives, or friends, with the intent to provide it to a Government Employee), that influences any decision with the intent to induce someone, in any-manner that incentivizes to act or not to act, or delay an act that is contrary to their duty or the law, in order to obtain an improper benefit.
3	<b>Corruption</b>	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 which will lead to the misuse of power.
4	<b>Property</b>	Things and incorporeal objects, susceptible of having a value and of being appropriated, such as money, houses, and cars.
5	<b>Other Benefits</b>	Means things that are of monetary value such as discounts, receiving entertainment, receiving services, receiving training, construction or renovation of a house free of charge or charged at a lower abnormal

		rate, given as a reward, rental free housing, repayment of debt, to take someone on a trip, or Other Benefits that are of similar instances or circumstances.
6	<b>Bank Personnel</b>	Committees, executives, all personnel and Bank employees
7	<b>Government Officials Employees</b>	Government officials, individual in political position, constitutional court judges, individual positions in independent organizations, members of the National Anti-Corruption Commission and, by extension, officials of foreign government officials and international organizations as defined in Section 4 of the Constitution Relating to the Prevention and Suppression of Corruption, B.E. 2561
8	<b>Official Misconduct</b>	Any act or omission in the performance of one's official duties or any act or omission in circumstances that may lead others to believe that one has a position or duty that they do not, or the use of one's authority in one's position or duty, for the purpose of obtaining an improper benefit for oneself or others, or the commission of an offense against one's official duties or an offense against the administration of justice under the Criminal Code or other laws.
9	<b>The Bank's Affiliates</b>	Company or juristic partnership in the same group under Section 39 of the Revenue Code
10	<b>Persons Related to the Bank's Business</b>	A person or a group of persons including business partners, representative, intermediaries, counselors or other so related persons in other businesses of the Bank.
11	<b>Hospitality Expenditures</b>	These are expenses or expenditures incurred in conducting activities to build good relationships or, in some cases, are considered a form of social etiquette. These expenses or expenditures may include accommodation, transportation for site visits or study tours, as well as food and beverage costs.
12	<b>Gift(s)</b>	Property or Other Benefits that is given to express goodwill that may be presented in many forms, such as cash, goods, services, or gift vouchers, etc.
13	<b>Donation</b>	Giving of money, Property or Other Benefits belonging to the Bank for charitable purposes and for the public benefit of society, without any conditions attached that would benefit a specific individual or group.
14	<b>Sponsorship</b>	The giving of money, Property or Other Benefits with the objectives of supporting various activities or projects for business purposes, aimed at promoting a positive image and reputation for the Bank. This also helps to strengthen business relationships and is appropriate and consistent with the principles of fairness, transparency, and good governance in business operations.
15	<b>Facilitation Payment</b>	A small, informal payment made to a Government Employee with the sole purpose of ensuring that the official will carry out a routine procedure or expedite a process. This procedure does not require the

		official's discretion and is a duty that the official is legally obligated to perform, such as obtaining a license, a certificate, or receiving a public service, etc.
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**3. Scope of application**

3.1 This Policy applies to the personnel of the Bank and its oversea branches that are required by law to adhere to such standards, to the extent that they do not conflict with the laws of those countries.

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 Persons 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 Board of Directors**

The Board of Directors is responsible for approving and reviewing this Anti-Bribery and Corruption Policy at least once a year or whenever there are significant changes. This Policy should be appropriate and consistent with the Banks business operations and in compliance with related laws.

**4.2 Compliance Committee**

The Compliance Committee is responsible for consideration and reviewing this Policy before presenting it to the Board of Directors for final approval and oversees the overall Policy framework to ensure it is appropriate and consistent with the Bank's business operations and in compliance with related laws.

**4.3 Management Committee**

The Management Committee oversees the implementation of policies set by the Board of Directors and the Compliance Committee including monitoring overall policy-level management of the Bank's business operations and to ensure to drive the implementation of the policy by Bank.

#### **4.4 Directors and Senior Management (executives)**

Directors and executives are responsible for actively and continuously controlling, supporting, and driving the implementation of this Policy to prevent the receiving or giving of Bribery 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.

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 Anti-Bribery and Corruption.

#### **4.5 Banks Personnel (employees)**

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.

#### **4.6 Representatives of the Bank**

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.

#### **4.7 Related persons with the Bank's Business**

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 accept, agree to accept or 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 Employee ~~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.

## **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**

Paying Facilitation Payments to Government Employee ~~Officials~~ carries a very high risk of being considered Bribery. The Bank does not have a policy of supporting such facilitation payments and will not engage in or accept any actions in exchange for facilitation of business processes.

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**

The Bank does not intend Bank Personnel to provide payment for Hospitality Expenditures and Gifts to incentivize Government Employees to commit unlawful acts in the performance of their duties or be used as a bribe.

The Bank does not intend for the Bank Personnel to accept any Hospitality Expenditures and Gifts to incentivize Government Employees to commit unlawful acts in the performance of their duties or be used as a bribe.

Therefore, the value or price of Hospitality Expenditures and Gifts must reflect reasonableness and necessary to reflect customary practices, cultural norms, or social etiquette with no ulterior motives. For example, on festive occasions or important days, as well as on occasions of congratulations, gratitude, welcoming, or condolences.

The acceptance and payment for Hospitality Expenditures and Gifts must comply with the Bank's established procedure. This includes the reporting, obtaining necessary approvals, reimbursement and the maintenance of appropriate related evidentiary documentation.

## **7.3 Donations and Sponsorship**

Donations is the part of corporate culture of the Bank to support the community but Charitable Donations may be the method of Bribery. Therefore, such 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 or used as an excuse for fraud and corruption.

The giving or accepting of any Sponsorship, Property or any Other Benefits must have a clear purpose; the value or price given must be reasonable, and the Sponsorship must not be a bribe or to cover up a bribe.

The giving or accepting of any Donations and Sponsorship must be in accordance with the Bank's procedure. This includes the reporting, obtaining necessary approvals, reimbursement and the maintenance of appropriate related evidentiary documentation.

## **7.4 Political Contributions**

Political Contributions may be seen as motivating/incentivizing persons holding political positions, who are Government Employees, 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 Employee**

### **8.1 Hiring of Government Employee**

In the event that a Government Employee is hired to take part in the management or performance of work for the Bank, such hiring must not be an employment in return for any benefits from the Bank



## **8.2 Disclosure of information about the hiring of Government Employee**

Information regarding the hiring of Government Employee 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 and Penalties**

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 shall constitute an Official Misconduct ~~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. Communication and Training**

The Bank also communicates and publicizes its anti-bribery and corruption policy, and preventative measures for its personnel and business partners, for example, announcements, arrangement of training courses, media publications, including encouraging employees to participate in external training.

## **13. 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.