



Anti-Corruption Policy

Introduction

Rhombho Property Public Company Limited and its group companies or affiliates (the “Company”) place great importance on combating all forms of corruption. The Company recognizes that corruption has detrimental effects and poses significant obstacles to the social and economic development of the country. It is an unethical act that creates unfair business practices, negatively impacts business ethics and competitiveness, and is unacceptable both domestically and internationally. Furthermore, corruption undermines the confidence of stakeholders, shareholders, investors, and all related parties in the Company. Therefore, the Company upholds the principle of conducting business with transparency, emphasizing the promotion of integrity, fostering ethical awareness, and instilling the right values in business operations. This is done under the principles of good corporate governance, ensuring that the Company does not support any businesses, groups, or individuals who engage in, tolerate, or facilitate any form of corruption, whether directly or indirectly.

Objectives

The Anti-Corruption Policy serves as a guideline for directors, executives, and employees at all levels to perform their duties with integrity and a strong sense of honesty, free from corruption or any form of misconduct for personal gain. It also ensures that decisions and business operations involving potential corruption risks are thoroughly and carefully considered.

Definitions

1. **Corruption** refers to bribery in any form, including offering, giving, promising, requesting, or accepting money, assets, or any other improper benefits whether directly or indirectly to or from government officials, government agencies, private organizations, business partners, customers, or any stakeholders. This is done to influence actions, omissions, or the exercise of authority in a way that secures or maintains business benefits, competitive advantages, or business referrals for a particular company, or to gain or retain any other improper benefits for oneself or others. However, exceptions apply in cases where such actions are permitted by law, regulations, announcements, rules, local customs, traditions, or business practices.
2. **Giving of Items or Other Benefits** refers to offering special privileges in the form of money, assets, goods, gifts, or any other benefits as a token of appreciation, an incentive, a reward, or to foster good relationships.
3. **Receiving of Items or Other Benefits** refers to requesting or accepting special privileges in the form of money, assets, goods, gifts, or any other benefits such as receiving gifts, soliciting donations, accepting entertainment or hospitality, or receiving financial contributions as an incentive, a reward, a token of appreciation, or to influence actions or omissions, or to foster good relationships.
4. **Entertainment and Hospitality** refers to providing meals, beverages, entertainment, hospitality services, participation in sports or recreational activities, as well as attending seminars, training sessions, study visits, or business site visits.



5. **Bribery (Giving or Receiving Bribes)** refers to offering or accepting items, gifts, rewards, or any other form of compensation to influence a person's decision, actions, or omissions, or to gain personal benefits or facilitate a desired outcome in a dishonest, unlawful, or unethical manner that violates the company's code of conduct.
6. **Bribery** refers to assets or other benefits that are given or offered to a person to influence them to act or refrain from acting according to the wishes of the bribe payer.
7. **Sponsorships** refer to funds given to or received from customers, business partners, or stakeholders for business purposes, such as enhancing commercial credibility or strengthening business relationships in an appropriate manner based on the occasion.
8. **Donations** refer to the voluntary use of the company's resources such as money, goods, assets, personnel, or other benefits provided to organizations or individuals to support charitable activities without expecting any commercial benefits in return.
9. **Political Contributions** refer to the provision of financial support, assets, or other benefits, either directly or indirectly, to support political activities with the intent of gaining special privileges or business advantages for the company in an unlawful manner. However, this does not include employees' participation in political activities as part of their individual rights and freedoms.
10. **Facilitation Payment** refers to unofficial payments or gifts given to government officials solely to ensure that they perform their duties according to standard procedures or to expedite processes that do not require the officials' discretion. These payments are made for actions that the officials are already obligated to perform and for which the entity is legally entitled, such as obtaining licenses, certificates, or public services.

Roles, Duties, and Responsibilities of Relevant Departments

1. **The Board of Directors** has the following duties:
 1. Establish and approve the anti-corruption and anti-bribery policy.
 2. Approve and review the implementation guidelines for anti-corruption and anti-bribery measures.
 3. Oversee the implementation of a system that supports anti-corruption measures.
 4. Supervise and support the implementation of anti-corruption measures throughout the organization.
2. **The Audit Committee** has the following duties:
 1. Review to ensure that the company has adequate internal controls and internal audits.
 2. Review to ensure effective compliance with the anti-corruption policy.
3. **The Risk Management Committee** Responsible for conducting risk assessments related to corruption, including evaluating its impact and covering various forms of fraud, such as falsification of financial reports, asset misappropriation, corruption, management override of internal controls, alteration of critical report



data, and improper acquisition or use of assets. Additionally, regularly monitor and follow up on the management of these risks.

4. **The Chief Executive Officer (CEO)** has the following duties:

1. Supervise and ensure the effective implementation of anti-corruption measures, identifying risks, conducting audits, and managing them with adequate measures to resolve issues appropriately, promptly, and in a timely manner.
2. Support the development of processes and personnel to ensure the organization's anti-corruption measures are effectively implemented and achieved.

5. **Executives** have the following duties:

1. Supervise subordinates and ensure compliance with the company's anti-corruption policy and measures in daily operations.
2. Monitor subordinates' compliance with the anti-corruption policy and measures. If any violations are found, report them through the Whistleblower Channel for complaints, tips, and feedback.

Internal Control

The company places great importance on an appropriate and sufficient ****internal control system**** to oversee and prevent corruption. It ensures the adequacy of internal controls through regular reviews, audits, and evaluations of each process, specifically addressing corruption risks. During these evaluations, if urgent issues are identified—particularly those posing corruption risks—management or internal auditors must discuss the matter with responsible personnel and relevant executives. They are also required to provide recommendations for improvements, corrections, and the development of effective internal controls that can be practically implemented. Additionally, audit results must be compiled into a report and submitted to the Audit Committee for review on a quarterly basis.

Accounting Audits and Record-Keeping

1. The company has an accounting audit process in place, ensuring that all transactions are reviewed and approved in accordance with the company's approval authority regulations. Transactions must be verified by authorized personnel before being recorded in the accounting system. The verification process follows company policies, relevant regulations, applicable laws, contracts, and agreements to ensure compliance with accounting standards and the company's accounting policies appropriately.
2. All company expenses, including operating expenses and investment expenditures, must be supported by complete and accurate documentation. Additionally, they must receive approval in accordance with the company's approval authority regulations.
3. The preparation of financial reports must be accurate, truthful, and reliable, ensuring transparency and compliance with accounting standards. All material information must be fully and correctly disclosed, including related-party transactions and potential liabilities.



4. The company has a secure and adequate document storage system for accounting records, ensuring they are readily available for audits. Access to accounting information is strictly controlled, and backup files are securely stored to prevent data loss.

Anti-Corruption Policy

Directors, executives, and employees of the company are prohibited from accepting any form of corruption, whether from government agencies, private organizations, or individuals with related duties, both directly and indirectly, in order to gain business for the company or personal benefits that are not in line with ethical principles. This includes giving assurances to offer or accepting gifts, offering or receiving gifts, hospitality, donations, fundraisers, or any other benefits from individuals with interests related to the business.

This anti-corruption policy applies to all business partners, customers, and stakeholders of the company, both domestic and international. The company ensures regular reviews of compliance with the anti-corruption policy and conducts an annual risk assessment for potential corruption across the organization.

Guidelines for Anti-Corruption Practices

1. The company has established a 'No Gift Policy' during festive seasons such as New Year or other occasions to promote a good business standard. This policy is communicated to the directors, executives, employees, and business partners of the company.
2. The company ensures reliable financial reporting, efficient operational systems, and assesses the risks of corruption and bribery in business processes. Regular monitoring and oversight are conducted to promote transparency in operations.
3. The company has established programs to disseminate, promote, and develop knowledge and understanding among internal personnel, especially those who interact with stakeholders, in order to foster a positive mindset and an organizational culture that does not tolerate corruption.
4. The company has established channels for complaints and whistleblowing regarding actions that may lead to corruption within the company. The company ensures protection and fairness for the whistleblower, including employees who refuse to participate in corruption or those who report corruption related to the company. These channels are outlined in the company's policy on receiving complaints and reporting misconduct.
5. The company considers any act, involvement, or knowledge of corruption as a violation of the company's business ethics. The wrongdoer will be subject to disciplinary action as outlined by the company. If the act is illegal, the company will consider taking legal action in accordance with the relevant laws.
6. Guidelines for the Conduct of Directors, Executives, and Employees
 - 6.1 Directors, executives, and employees of the company must comply with the 'Anti-Corruption and Anti-Bribery Policy' and must not be involved in corruption, either directly or indirectly.



- 6.2 Directors, executives, and employees of the company must not use the authority or responsibilities granted by the company to seek personal benefits or provide advantages to family, associates, or close individuals, either directly or indirectly. This includes any unethical actions such as selling personal goods or services to the company or engaging in business competition, whether directly or indirectly, against the company.
- 6.3 Executives and employees must not ignore or disregard any observed incidents that may involve corruption related to the company. They must report the matter to their supervisor or the responsible individual, or use the 'Whistleblower Channel' to report concerns or provide feedback. Executives and employees are required to cooperate in fact-finding investigations.
- 6.4 Executives and employees of the company must not solicit or accept any improper benefits from stakeholders as outlined in the guidelines regarding the giving or receiving of gifts or other benefits. They must be cautious and avoid accepting hospitality from stakeholders who may benefit from the actions of the company's employees or executives
- 6.5 Employees of the company have the responsibility to explain and seek cooperation in implementing the 'No Gift Policy' to inform stakeholders of the company, especially during key festive seasons and other relevant occasions.
- 6.6 Executives and employees must cooperate in promoting good practices within the organization with the responsible departments for internal control and auditing, in gathering information and following up on actions if corruption or any related information is found. Whistleblowers or those who report will be provided with fair protection of their rights, and all information provided will be kept confidential by the company.

Operational Guidelines

The anti-corruption policy covers all activities related to the company's operations. Any actions taken in accordance with the anti-corruption policy must follow the prescribed procedures and other practices set by the company to ensure clarity in implementing the policy and to avoid risks that may lead to corruption. Directors, executives, and employees at all levels of the company must perform their duties with caution regarding the following matters

1. The acceptance of gifts or any other benefits

- 1.1. The company requires that directors, executives, and employees refrain from accepting gifts or any other benefits from all stakeholders involved in the company's business operations. This includes accepting gifts, soliciting donations, requesting hospitality, accepting charitable contributions, and similar actions.
- 1.2. Employees are responsible for informing business partners and relevant stakeholders about the company's 'No Gift Policy' periodically and requesting their cooperation in adhering to this policy



- 1.3. In cases where it is necessary to accept gifts or benefits that cannot be avoided, such as when a business partner is unaware of the 'No Gift Policy' and has already offered a gift, or when an employee is in a situation where refusing the gift would harm relationships with individuals or organizations, the employee should act as follows :
 1. Managers and above are authorized to accept gifts, provided the value does not exceed 3,000 baht. If the value exceeds this amount, the company does not permit the acceptance of the gift and requires the recipient to inform the giver about the 'No Gift Policy'
 2. Once the gift has been accepted, it must be reported, and the item must be immediately handed over to the Human Resources Department for appropriate action. For consumable items with expiration dates or souvenirs, the Human Resources Manager may distribute them to employees as deemed appropriate
- 1.4 In cases where the company is offered awards, souvenirs, or other items from competitions, business partnership agreements, or events recognizing the company's achievements, the company may accept such items on an organization-to-organization basis. A manager or higher-level representative will be assigned to receive the item, which will be considered company property.
- 1.5 The company allows the acceptance of souvenirs valued at no more than 500 baht during customary festivals, promotional events, or seminars. Examples include calendars, pens, and notebooks.
- 1.6 Requests for hospitality, training seminars, study visits, or business visits funded by stakeholders involved in the company's operations are not permitted unless they are appropriate, customary, or comply with relevant laws. Such offers must be organization-to-organization and not individual-based. They must also be reviewed and approved in accordance with the company's authorization procedures.

2. Providing Gifts or Other Benefits

The company has established guidelines for providing gifts or other benefits to customers, partners, business representatives, business allies, or individuals involved in the company's business operations. Such actions may be carried out during customary and traditional festivals, provided they do not violate the law or create undue influence on decision-making. This approach aims to avoid and prevent bribery practices that may lead to corruption. Executives and employees must strictly comply with the company's approval authority regulations and procedures.

3. Policy on Charitable Donations or Sponsorships

The giving or receiving of charitable donations, solicitations, sponsorships, goods, or any other funds for charitable purposes must be conducted transparently and in compliance with the law. It must also be ensured



that such actions are not used as a pretext for giving or receiving bribes. In cases where donations involve significant amounts, the company will submit the matter to the authorized personnel for review and approval in accordance with the company's authorization regulations. Strict procedures will be followed to prevent opportunities for corruption.

4. Political Contribution Policy

The company operates with political neutrality, refraining from involvement or support for any political party, politician, or political authority. The company does not allocate any funds or resources to support political parties, politicians, or political authorities, either directly or indirectly

The company has established guidelines prohibiting directors, executives, and employees from using their positions, company assets, time, or any company facilities to benefit or support any political activities, political organizations, or related political matters. Additionally, the company forbids the use of authority to encourage, pressure, or coerce colleagues or subordinates into supporting any political activities

5. Business Relationships and Procurement

The company prohibits the giving or receiving of bribes in all forms of business dealings with business partners, contractors, or any entities, both public and private, that conduct business with the company. All business operations must be conducted transparently and in compliance with the law. Each step of the procurement process, including payment disbursements or contract agreements, must be supported by clear, appropriate, and well-documented evidence, and must strictly adhere to the company's approval authority.

6. Hospitality Fees and Other Expenses

The payment of hospitality fees and other expenses to build business relationships with partners or individuals related to the company's business may be conducted by the company, provided that it follows the company's approval authority regulations. It must be ensured that such actions are not intended to gain any unfair advantage and/or to exchange for improper assistance or benefits, and/or to engage in any actions that could lead to bribery or corruption

7. Facilitation Payment

The company prohibits the payment of facilitation fees that could lead to corruption. The company rejects the giving, offering, or receiving of bribes or facilitation fees that may result in corruption, both directly and indirectly, to assist in any business dealings with government officials and agencies in any form. Furthermore, the company's engagement with government agencies must be transparent, honest, follow the procedures established by the government agencies, and/or comply with relevant laws

Control

1. Guidelines for Monitoring/Assessing Compliance with the Anti-Corruption Policy

The company provides various channels for directors, executives, and employees to participate in adhering to the policy, such as employee training, orientation for new employees, and announcements through communication media, among others. Additionally, the company monitors and evaluates compliance with the



policy by conducting surveys to gather feedback and testing the knowledge of executives and employees within the company and its affiliates regarding anti-corruption and corruption-related matters.

2. Practices for Oversight and Control to Prevent and Monitor Corruption Risks

The company has established mechanisms to monitor and assess risks by setting standards and guidelines in its operational manuals. It also provides channels for employees and stakeholders to report any actions that may violate the policy. These actions are in line with the company's policy on receiving complaints and whistleblowing regarding violations.

3. Employee Training on the Company's Anti-Corruption Policy and Practices

The company and its affiliates provide training on the policy and practices for preventing corruption to employees responsible for or involved in anti-corruption efforts within the organization. This includes initial training on corruption prevention for new employees, as well as ongoing training on anti-corruption, bribery, and the company's code of conduct. Additionally, the company communicates these matters through various channels, including the creation of a business ethics handbook and the policy for receiving complaints and whistleblowing on violations.

Protection and Confidentiality of Complainants or Involved Parties

The company has established measures to protect whistleblowers, complainants, informants, witnesses, or any individuals involved in the complaint process. These individuals will be safeguarded by the company, ensuring their rights are protected. All information and evidence that could identify the whistleblower, complainant, informant, witness, or any related party will be securely protected and kept confidential.

The company will not consider demotion, punishment, or any negative actions against employees who refuse to engage in corruption and bribery, even if such actions may result in a loss of business opportunities for the company.

Consideration of Penalties

In cases where directors, executives, or employees violate, neglect, omit, or intentionally fail to comply with the anti-corruption policy, such actions will be considered disciplinary offenses. The company will impose penalties in accordance with its regulations. If the actions also violate the law, the company will take further legal action as appropriate.

Review of Anti-Corruption Measures

The company requires a regular review and improvement of anti-corruption measures under this policy every year or whenever there are significant changes that impact the measures or anti-corruption practices. The review of anti-corruption measures must be considered and approved by the Corporate Governance Committee and further approved by the Board of Directors. Additionally, the company will ensure that these measures and anti-corruption practices are effectively communicated across the organization.



RHOM BHO PROPERTY PUBLIC COMPANY LIMITED

Inquiries and Contact Information

Employees can inquire and seek advice on compliance with anti-corruption measures by contacting the Corporate Secretary Office at 0-2103-2444 or via email at comsec@rhombho.co.th.