



TURNKEY COMMUNICATION SERVICES PUBLIC COMPANY LIMITED

บริษัท เทิร์นคีย์ คอมมูนิเคชั่น เซอร์วิส จำกัด (มหาชน)

Anti-Corruption Policy

(นโยบายการต่อต้านการทุจริตคอร์รัปชัน)

Anti-Corruption Policy

Turnkey Communications Services Public Company Limited ('Company') understands the importance of opposing corruption and has a strong commitment to running the business honestly under good governance while upholding governance and ethics in doing business, have social and environmental responsibility, and responsibility towards all stakeholders, operating the business with transparency, fairness, and accountability.

To be confident of this, the Company has set responsibilities, guidelines, and rules regarding suitable business operations in order to protect against all forms of corruption in our business. To ensure that all decisions and business operations susceptible to corruption be evaluated and undertaken cautiously, the Company has committed its Anti-Corruption Policy in writing to be used as a clear guideline in business operations and sustainable development.

1. Definitions

Corruption refers to improper use of authority for ill-gotten gains or bribery regardless of its nature such as asking for contracts, commitments, requests, payments, gifting of assets, or other benefits from a government official, government agency, private entity, or anyone with authority, whether directly or indirectly, so that the person will be induced into acting or not performing their duties or in return for certain improper benefits to the business.

Charity refers to a payment for which the person does not expect any benefit in return.

Donation for public interest refers to giving money to a project or activity to benefit society, community, or group of citizens from whom the Company expects no benefit in return.

Political contributions refers to contributions from the Company, be it in money or other means, to support political activity, credit assistance, or in-kind assistance such as providing goods and services, campaign advertisement, buying tickets to political fundraising events linked to political parties, etc, with the exception for support of democracy within the confines of the law.

Sponsorship refers to money paid for certain services or benefits that are difficult to quantify or monitor, which may be linked to bribery such as sponsorships with hidden agendas via charity sporting events or using charity as a cover for influencing government officers or related persons (for favorable treatment in gaining contracts, business opportunity, reduction of fees, giving, assisting, or cancelling rules within various licenses which are not in line with normal government processes; canceling or reducing legal restrictions, or helping to gain access to government officials).

Government officials refers to a government official as defined by counter-corruption laws and includes government officials, officers, state enterprise employees, staff, agents, or any person who represents the various agencies, such as:

- Ministry, Bureau, Department or agency of the State (such as Excise Department, Immigration Office, etc).
- International agencies such as the World Bank, the IMF (International Monetary Fund), etc.
- Political party, holders of political offices, or political candidates (both government and opposition), and local administrators.
- Supervisory bodies (such as the SEC, BoT {Bank of Thailand}, SET, etc)
- State enterprises, companies, or other organizations that their state or state agency is the

2. Anti-Corruption Policy

2.1 Directors, executives, and employees of the Company will not demand, undertake, or accept any form of corruption, whether directly or indirectly, for the benefit of the Company, themselves, family, friends, acquaintances, or for business benefit including businesses in any country and related unit related to the Company.

2.2 The Company will audit in accordance with the Anti-Corruption Policy regularly, revise its practice and rules in operating to align with changes in business, rules, restrictions, and laws. In addition, if there is any violation in encouraging or assisting corruption, the Company will penalize according to the Company's rules. Apart from this, it may also pursue legal actions against the perpetrator.

3. Responsibilities

3.1 The Board of Directors has a duty and responsibility in setting and approving the Anti-Corruption Policy and supervising the business well, ensuring that there is efficient anti-corruption systems in place to ensure the Management Team sees its importance and practices it until it becomes part of corporate culture.

3.2 The Audit Committee has the duty and responsibility to adequately audit the Company's internal controls, including finance and accounting systems, internal control systems, internal audit system, and risk management systems and audit operations in accordance with the Anti-Corruption Policy, rules, related laws, and international standards. They should also exercise caution, suitability, currency, and efficiency.

- 3.3 The CEO, Management Team, and executives have joint responsibility in setting up systems to support, control, and ensure employees and related parties of the operations and Anti-Corruption Policy, including checking the suitability of the system and various measures to align them with changes in business, rules and regulations under the law.
- 3.4 The Internal Audit Department has the responsibility to inspect and audit operations to ensure accuracy and compliance with the policy, guidelines, rules, and related laws in order to ensure proper and sufficient internal controls for the risk of corruption that may happen and report to the Audit Committee.
- 3.5 The directors, executives, and employees must adhere to the Anti-Corruption Policy and not get involved in corruption both directly and indirectly.
- 3.6 The subsidiaries, affiliates, and business representatives of the companies controlled by the Company must accept the Company's Anti-Corruption Policy.

4. Scope and Guidelines

- 4.1 The Company requires directors, executives, and employees at all levels to deal with all forms of corruption cautiously as follows:

- **Bribery**

They must not accept bribes in any form in return for business-related benefits and must not authorize anyone to give or accept bribes.

- **Business relationships and procurement with the State**

Any operation of the Company and contact with the State must be transparent, honest, and done legally.

- **Gifts, entertainment, and other benefits**

Giving gifts or assets or providing entertainment or any other benefits to customers, suppliers, or stakeholders related to the Company must follow Company rules.

- **Political Contributions**

The Company has a policy of not helping or supporting any political party, political group, or politician, whether through direct or indirect means.

- **Receipt of contributions, charitable donations, contribution for public benefit, and giving contributions**

The Company requires that contributions, charitable donations, contribution for public benefit, and giving or receiving contributions must follow rules such as:

1. Must be transparent, legal, and not unethical. In addition, it must not cause damage to the overall society.
 2. Not related to or eventually used for bribery.
 3. Must follow the procedures for auditing and approval of charitable donations, contribution for public benefits, or contributions of the Company.
 4. In suspicious cases that may impact legally, seek the advice of the Legal Department in writing or rely on the discretion of the Management Team for important matters.
- 4.2 The Company strives to build and foster a corporate culture that considers corruption in dealings with both government and private sector to be unacceptable.
- 4.3 The company directors, executives, and employees at all levels should not neglect or ignore corrupt acts linked to the Company and must inform superiors or responsible persons and cooperate in investigation, including creating channels for outsider complaints. In this, it must comply with the policy on complaints, whistle-blowing, and corruption laid out by the Company.
- 4.4 The Company will protect and treat employees who reject corruption fairly. Those who report the Company's corruption will not be demoted, penalized, or impacted negatively. Those who cooperate with corruption reporting according to the policy will also be treated fairly, even if the Company itself may lose business opportunities as a result.
- 4.5 Directors and executives at all levels of the Company must show honesty and be role models for implementing the Anti-Corruption Policy by having the Company secretary and HR Department be responsible for disseminating the knowledge and understanding and encouraging employees at all levels to uphold this policy strictly and continuously and incorporate it into the corporate culture.
- 4.6 The Anti-Corruption Policy encompasses human resource management from recruitment to selection of personnel, promotions, training, and performance evaluation of employees by assigning all line managers to communicate it to their staff in order that the business under their supervision may follow the policies efficiently.
- 4.7 Any operations under the Anti-Corruption Policy uses the principles of the Corporate Governance Policy, including rules, operating manuals for related companies, as well as the direction set forth by the Company.

4.8 The Company must communicate its Anti-Corruption Policy via various internal and external media such as announcements, corporate websites, and annual reports. The policy must also comply with laws of Thailand regarding Anti-Corruption.

5. Whistle Blowing and Complaints against Corruption

- 1) Identify any form of corruption, direct or indirect, such as persons within the Company accepting or paying bribes to government officials or private entities.
- 2) Identify any violation in the procedure or rules of the Company that may impact internal controls of the Company that may lead to channels for corruption.
- 3) Identify any wrongdoing which may damage the Company and impact its reputation.
- 4) Identify legal wrongdoings or violations of the Company's business ethics.

6. Channels for Whistle Blowing and Filing Corruption-related Complaints

The Company must open channels for complaints, whistle-blowing, or expressing opinions so that employees will participate, complain, whistle-blow, or voice opinions that lead to human resource development and better management as follows:

6.1 Email: cg@tkc-services.com

6.2 Post mail: Address to

6.2.1 CEO or Chairman of Audit Committee

6.2.2 Head of Human Resource and Administration Department

Send to Company headquarters at: 44/44 Vibhavadi-Rangsit 60 Yake 18-1-2, Talad Bangkhen, Laksi, Bangkok 10210 (Headquarters)

6.3 Website: <https://www.tkc-services.com/>

In cases where the complainer or whistle-blower sends a complaint against the CEO or Executive Committee, please direct the complaint to the Audit Committee directly.

Whistle blowers include stakeholders of the Company such as shareholders, customers, creditors, government agencies, communities, society, executives, and employees of the Company. Regardless of how you submit your complaint, the Company will maintain your confidentiality.

7. Protection and Confidentiality Measures

In order to protect the complainer or whistle-blower who have acted honestly, the Company will maintain their confidentiality, address, and other information that may identify the complainer or whistle-blower by limiting access to such information only to those inspecting the complaints.

In the event of a complaint against the CEO and/or Executive Committee, the Audit Committee must protect the whistle blower, complainer, witnesses, or anyone providing information from retaliation, danger, or injustice arising from whistle blowing, providing witness testimony, or sending a direct complaint to the Audit Committee.

- The CEO has the responsibility and discretion to protect the whistle-blower, complainer, witness, or provider of factual evidence from any trouble, danger, or injustice arising from whistle blowing, complaint, providing witness testimony, or providing factual evidence.
- The CEO will delegate one executive to use his discretion in protecting the whistle-blower, complainer, witness, or provider of factual evidence, and the assigned executive must not himself be involved with the case brought up by the whistle-blower or complaint, both directly or indirectly (eg. Must not be the accused or a direct subordinate of the accused).

In addition, the person who receives evidence regarding the complaint has the duty of keeping the evidence, complaint, and any supporting documents in confidentiality and must not reveal it to anyone not directly involved unless required by law.

8. Investigation Process and Penalty

- 1) When informed by a whistle-blower, the CEO, Executive Committee, and/or Audit Committee will check, analyze, and investigate accordingly.
- 2) While investigating, the CEO, Executive Committee, and/or Audit Committee may delegate the role, update the whistle-blower, or inform the complainer.
- 3) If the investigation finds the evidence to be credible in pointing to the accused's corruption, the Company will inform the accuser and give the accused the opportunity to prove themselves against the allegations with additional evidence to show that they were not involved in acts of corruption as the accused claims.
- 4) If the accused is guilty of corruption, it will be considered a serious violation of the Company's Anti-Corruption Policy and the Company's business practice and ethics. Thus, the accused must be penalized according to the rules set by the Company. If the corruption is illegal, the accused will also be legally punished. With regards to disciplinary actions, the decision of the CEO will be considered final.

When a complaint is made upon the CEO or Executive Committee, the Audit Committee will acknowledge the case, find evidence, and investigate the facts as notified in order to inform the Board of Directors and jointly evaluate and set penalties, as they deem fit.

9. Communicating the Anti-Corruption Policy

In order for everyone in the Company to be informed of the Anti-Corruption Policy, the Company shall:

- 1) Display the Anti-Corruption Policy in a clear area so that everyone can read it.
- 2) Distribute the Anti-Corruption Policy via company multimedia, such as corporate website, email, annual report, and Form 56-1.
- 3) Arrange training regarding the Anti-Corruption Policy to all new employees.
- 4) Revise the Anti-Corruption Policy at least once a year.

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(Mr. Kittisak Amornchairojkul)
Chairman of the Board