

**(English Translation)**

**Policy Against Corruption**

The Board of Directors of Loxley Public Company Limited realizes the importance of corporate good governance, hence, establishes written Corporate Good Governance Policy as a guideline for appropriate business conduct and sets out “Business Ethics” as a guideline for work performance of its employees. Moreover, the Company is aware of the importance of prevention against risks that may occur to transactions which may lead to corruption while performing work. Therefore, the Company establishes Policy Against Corruption in order to sanction dishonesty/fraud and corruption, in physical form, in compliance with the Company’s corporate good governance principles.

**Definition of Corruption**

Corruption means bribery in whatever form, either directly or indirectly, by offering to give or accepting offer to give, whether in cash, assets or other interest which is inappropriate and will influence on decision towards persons, organization, governmental entities, governmental officer or private entities in order to cause such persons perform or omit to perform duties and acquire or retain inappropriate business interest, except in cases laws, rules, notifications, regulations, local culture and tradition or norm so permit.

**Policy**

The Company has the policy to sanction dishonesty/fraud and corruption of all forms so that businesses can be conducted transparently and fairly, by prohibiting directors, employees, officers, executives and agents acting in the Company’s name from being involved with or being reasonably believed to be involved with dishonesty/fraud and corruption, whether directly or indirectly. The Company will regularly review and examine operational procedures to be in compliance with the changes of relevant laws, regulations and rules.

**Scope**

Policy against corruption applies to directors, executives, employees, officers and agents acting in the name of Loxley Public Company Limited, subsidiaries, related companies or other companies which the Company has control over, whether conducting businesses domestically or overseas.

Provided that the Company has the policy not to demote, punish or act negatively towards the employees who deny corruption regardless of the fact that such denial will cause the Company to lose business opportunity.

## **Duties and Responsibilities**

1. The Company's Board of Directors has duties and responsibilities in regulating policies and supervising and monitoring to ensure an effective system which supports sanction against corruption and to ensure that the executives are aware of and give importance to the sanction against corruption.
2. The Executive Committee has duties in promoting and supporting policy against corruption and will implement this policy as part of the Company's human resources management. Also, the Executive Committee will review the appropriateness of various systems and measures to ensure compliance with changes in various businesses, laws and regulations.
3. Vice President of Internal Control Department has duties and responsibilities to inspect and audit to ensure that work performance system is carried out properly in line with policy, operational regulation and laws and that the Company has appropriate and sufficient control system against potential corruption risk and to report the results of such inspection and audit to the Audit Committee.

## **Guideline to prevent risk on potential occurrence of corruption**

1. Gifts, souvenirs and Entertainment

Creating good business relationship with potential business partners, creditors or customers may lead to dishonesty/fraud and corruption. Creating good business relationship may involve giving or accepting gifts, souvenirs, accepting or paying entertainment expenses which in certain culture, may be seen to be normal and is difficult to draw the line whether it is giving or accepting gifts or corruption. The Company expects that persons involving in such matters could consider and determine to ensure that incurred gifts, souvenirs and entertainment expenses is appropriate in each occasion and appropriate to receiver or giver without violating laws or social acceptance.

Provided that value of each underlying transaction of gift, souvenir and entertainment expenses will be recorded properly and with evidence for subsequent examination.

2. Donation for Charity or Supporting Funds

Giving or accepting donation or supporting funds must be transparent and legal and will not be asserted for committing bribery acts.

3. Transaction with Governmental Sector

Communicating with governmental officers must be done properly, straightforwardly and in compliance with relevant laws for reliance by governmental entities.

#### 4. Political Activities Support

The Company supports the exercise of right to vote both at local and national levels. This is the preserving of important right and the duty and responsibility of citizens under democratic regime. However, the support or participation in political activities must be in personal name and cannot be referred as being done as the Company's representatives.

#### **Risk Assessment**

Executives must assess potential risk of occurrence of bribery and corruption and audit risk management measure to be at an acceptable level.

#### **Communication and Training**

All employees will receive training regarding sanction against corruption to be aware of this policy, especially various forms of bribery giving and risks from participation in bribery giving. The Company will disseminate the policy against corruption at the Company's website [www.loxley.co.th](http://www.loxley.co.th) and Intranet so that the employees may at all times review them. Training for knowledge on this policy will be a part of orientation to all new employees of the Company.

In addition, the Company encourages its agents, business intermediaries, suppliers/services providers transacting with the Company to observe responsibility standards towards the society in the same manner as those observed by the Company.

#### **Complaint Channels**

Stakeholders of all groups may report unethical behavior, inform or notify complaints and dishonesty/fraud through independent directors or the Audit Committee via the following channel:

Secretary to Audit Committee  
Loxley Public Company Limited  
102 Na Ranong Road, Khwaeng KhlongToey, Khet KhlongToey, Bangkok 10110  
Or email: [ac@loxley.co.th](mailto:ac@loxley.co.th)

The Company will consider all requests and complaints and will take actions on an equal footing, transparently and fairly to all parties on a timely basis. Further, the Company will keep the information confidential to protect safety of the complainant. The independent directors or Audit Committee will investigate and directly report to the Company's Board of Directors.