

# Anti-Bribery Regulation



Compliance Office

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## **Part 1 General Regulation**

### **Chapter 1 Purpose**

EASY BUY Public Company Limited (hereinafter referred to as 'Company') has established Anti-Bribery Regulation in order to clarify the basic regulation regarding bribery and provide forth the matters necessary for anti-bribery.

### **Chapter 2 Basic Principles**

Board, Executives and Employees shall not conduct any form of Bribery, regardless of whether it is direct or indirect, and they shall comply with the applicable laws and regulations of all countries regarding Bribery including with Anti-Corruption Policy of Company.

### **Chapter 3 Scope of Regulation**

This regulation applies to Board, Executives and all Employees.

### **Chapter 4 Definitions**

"Bribery" means the offering and acceptance of a bribe.

"Offering of a bribe" means any person in violation with applicable laws and/or regulations gives, or offers or promises to give anything of value to a public official or any other person in relation to his/her duties or position.

"Public Official or Any Other Person" means public official, either domestic or foreign, or any other person.

"Any Other Person" means any group/individual other than a public official, such as Board Executives and employees of the company or customers.

"Acceptance of a bribe" means Public Official or Any Other Person in violation with applicable laws and/or regulations receives, or requests or promises to receive anything of value in relation to their duties or position.

"Anything of Value" means any benefit that satisfies a person's demands or desires, including but not limited to

- (1) Property benefits, presenting money or goods such as commissions, remuneration, tips or donations, regardless of the name thereof, and giving preferential treatment regarding transactional conditions, and
- (2) Entertainment with eating and drinking, and
- (3) Employment of an acquaintance or family member.



“In relation to his/her duties or position” includes a public Official or Any Other Person making approaches regarding the duties of a Public Official or Any Other Person, or acting as an intermediary thereof, by utilizing his/her duties or position.

“Board” means the Board of Directors of the Company.

“Executives” means a person who takes a position of Executive Vice-President up including Chief Executive Officer and members of other committees and sub-committees that are appointed by the Board of Directors or shareholders.

“Employee” means staff according to definition in the Working Rule and Regulation of the Company.

“A person involved with the company” means a contractor, an agent, a representative, or any person who acts for or on behalf of that Company, whether they have the authority in such matter or not.

## **Chapter 5 References**

5.1 Anti-Corruption Policy

5.2 Authorization Rules

5.3 Ethics and Code of Business Conduct

5.4 Whistleblowing regulation

5.5 Entertainment and Gift Regulation

5.6 Regulations for Administration of Internal Rules and Regulations

5.7 Working Rules and Regulation

5.8 Procedure Manual of Report and Examination in Donation and Sponsorship

5.9 Criminal Code

5.10 The Organic Act on Counter Corruption B.E. 2561

5.11 Notification of the N.C.C. Commission concerning the provisions of the acceptance of property or any other benefit on ethical basis by State officials B.E. 2543 (2000)

## **Part 2 Procedure, Roles and Responsibilities of Each Department**

### **Chapter 6 Process**

#### **6.1 Risk Evaluation**

Compliance Office and relevant departments shall regularly evaluate the Bribery risk as necessary, based on

- (1) The establishment/amendment/abolishment and operation of applicable laws and regulations of all countries regarding Bribery, and
- (2) The business development and
- (3) Current status of management structure, and shall make efforts to develop an appropriate operational structure.

#### **6.2 Operations in Scope and Development of Management Structure**

1. Company performs the below operations, which particularly require caution from the perspective of anti-Bribery, shall develop a comprehensive anti-Bribery management structure, including but not limited to, preparing rules/procedures, in accordance with the Bribery risk thereof.
  - (1) Entertainment and gift
  - (2) Outsourcing
  - (3) Investments and business collaborations
  - (4) Charitable Donations and political contributions.
  - (5) Employment
2. Company shall develop a management structure that is appropriate for anti-Bribery, in accordance with the Bribery risk for the operations other than those under the preceding clause 1. ,in relation to providing or receiving anything, including but not limited to money, goods and services, from a person involved with the company thereof.

#### **6.3 Training**

The Company shall develop a structure to conduct continuous training in order to enhance awareness regarding anti-Bribery and comply with this regulation, related procedures and applicable laws and regulations regarding anti-Bribery, in accordance with the Bribery risk thereof.

#### **6.4 Monitoring**

Not only Compliance Office but all Departments shall monitor the status of its' operations and the like set forth in the preceding clause 6.2, in accordance with the Bribery risk thereof, and provide guidance for better practice, as necessary.



### **6.5 Duty to Report**

When Board, Executives and Employees become aware that Bribery occurred or become aware of an event that could lead to Bribery, they shall report bribery finding without delay to Compliance Office or Executive in charge of Compliance Office or relevant departments in accordance with applicable regulations of Company.

### **6.6 Whistleblowing System**

When Board, Executives, Employees and stakeholders find a problem in relation to Bribery, they may use the whistleblowing system in accordance with Whistleblowing Regulations, in addition to the reports/consultations pursuant to Duty to Report. When a report is provided via the whistleblowing system, the accountability of concerned party of whistleblowing regulation shall take appropriate responses, including but not limited to, decide how to investigate on the premise that the whistleblower will be protected, in accordance with the provisions of the procedures of whistleblowing regulation.

## **Chapter 7 Role and Responsibilities**

### **7.1 Compliance Office**

Compliance Office shall be in charge of this regulation under the management direction, Compliance Office shall develop an Anti-Bribery management structure for Company according to this Regulation, and propose matters regarding Anti-Bribery and the supervision of the suspicion of Bribery to the Board or Executives, as necessary.

### **7.2 Department**

All Department must be comply with this regulation.



## **Appendix**

### **Amendment and Abolition**

Amendment and abolishment of this regulation shall be made by pursuant to a resolution of the Board and shall be proposed by Compliance Office.

### **Periodic Review**

Anti-Bribery regulation shall be reviewed the content annually from the date of enforcement, in principle, or should necessities arise for amendment or abolition due to any material problem or significant suggestion.

### **Date of Enforcement**

This regulation shall become effective on December 15, 2018.