



Anti-Corruption Policy

EASY BUY Public Company Limited

Purpose and Scope of Policy

EASY BUY Public Company Limited (Company) intends to provide the Anti-Corruption Policy base on a conception of zero tolerance of bribery and corruption, which is required formal approval by the Board of Directors. The establishment of this Policy is consistent with the Company's Ethics and Code of Business Conduct, Corporate Governance Policy including anti-bribery laws of Thailand. Furthermore, the Company determines a risk assessment to develop the Program for countering bribery and to prevent our business from corruption. This Policy emphasizes that the Directors, Executives and Employees are prohibited from operating or accepting every types of corruption in a direct or indirect manner.

Basic Principle of practice

- 1) The Company prohibits the offer or receipt of gifts, hospitality or expenses beyond a certain limit and whenever such arrangements would be in violation of applicable domestic law.
- 2) The Company provides procedure and/or regulation to ensure effective, efficient and transparent systems of Internal Control.
- 3) Charitable contributions and Sponsorships are not used as a subterfuge for bribery and made in accordance with applicable domestic law.
- 4) The Company prohibits bribery in all business transactions that are carried out directly or through third parties, specifically including all stakeholders under its effective control. All employees must aware that any bribery action might cause the company being condemned.
- 5) The company complies with all applicable law and regulation related to government procurements, including laws prohibiting efforts to improperly influence government officials.
- 6) The company does not make direct or indirect contributions to political parties, political party officials, candidates, organizations or individuals engaged in politics, as a subterfuge for bribery. All political contributions are made only in accordance with applicable law.
- 7) The Company provides effective internal and external communication of the Program for countering bribery, which is publicly, disclosed. The Company provides secure and accessible channels through which employees and stakeholders can raise concerns and report suspicious circumstances (Whistle blowing) in confidence. The Company provides guidance to employees and stakeholder on applying the Program's rules and requirements to individual cases.



- 8) The Board of Directors and the CEO take responsibility for strategy of the Program and commitment to this Policy and the Program.
- 9) The company develops and maintains appropriate financial reporting mechanisms that are accurate and transparent as well as internal mechanisms for monitoring and controlling of the financial reporting system in accordance with accounting standards.
- 10) Recruitment, promotion, training, performance evaluation, and recognition reflect the Company's commitment to the Program. The human resource policies and practices relevant to the Program is developed and undertaken in consultation with employees and employee representative bodies, as appropriate. No employees will suffer from demotion, penalty or other adverse consequences for refusing to pay bribes.
- 11) The Company aims to create and maintain a trust based and inclusive internal culture in which bribery is not tolerated. All employees and concerns receive specific training on the Program which is tailored to relevant needs and circumstances.
- 12) The company applies sanction for a director who commits violation of the Anti-corruption Program of which the punishment will be determined by Board of Directors. For Executives and Employees who violate the Anti-Corruption Program must be punished and litigated according to the Company's Working Rules and Regulations and applicable laws.

Roles and Responsibilities of related persons

- 1) The Board of Directors ensures that an effective program has been developed and implemented. The Board of Directors also ensures that the Program is reviewed for effectiveness and, when shortcomings are identified, that appropriate corrective action is taken.
- 2) The Audit Committee or/and the Board make an independent assessment of the adequacy of the Program and disclose its findings in the disclosed information to shareholders.
- 3) The Chief Executive Officer (or the equivalent thereof) is responsible for supervising that the Program is implemented effectively with clear lines of authority.
- 4) Compliance Office monitors the Program and periodically reviews the Program's suitability, adequacy and effectiveness and implements improvements as appropriate. The Results of the Program review should be periodically reported to the Audit Committee or/and the Board.



Periodic review of the policy

This Policy shall be reviewed annually by Compliance Office from the date of enforcement. However, it may be reviewed in proper timing if there is any significant amendment or abolishment.

This Policy was considered and approved by the Board of Directors dated 13th December 2018 and shall come into force on 1st January 2019.