



THAI MEIRA CO., LTD.

**ANTI-BRIBERY &
ANTI-CORRUPTION
POLICY**

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1. INTRODUCTION

Thai Meira Company Limited ("**TMCL**" or the "**Company**") is committed to the prevention, deterrence and detection of fraud, bribery and all other corrupt business practices. It is the Company's policy to conduct its business activities with honesty, integrity and the highest possible ethical standards in whichever part of the world it operates.

2. SCOPE AND APPLICABILITY

The Anti – Bribery and Anti-corruption Policy (hereinafter referred to as "**The Policy**") states the Company's position with regards to all such acts which would constitute bribery and corruption. The Policy sets out the minimum standards to assist TMCL and its employees to prevent, detect and report corruption and bribery.

The policy supports the principles laid out in the Thai Meira Company Limited Code of Conduct (CoC) and should be read in conjunction with:

- a) The Thai Meira Company Limited Code of Conduct (CoC)
- b) Whistle Blowing Policy and Practices
- c) Any guidance published pursuant to this policy
- d) Any other relevant policies as may be implemented from time to time

This Policy shall apply to:

- a) All individuals associated with TMCL at all levels, including Board Members, Directors, senior executives, officers, employees (whether permanent, fixed-term or temporary), trainees, seconded staff, volunteers, interns or any other person associated with TMCL ("**Company Personnel**").
- b) All subsidiaries and joint ventures (in respect of which TMCL has sole control) and their subsidiaries ("**Associated Parties**"). For joint ventures/subsidiaries jointly controlled by TMCL and others, TMCL should discuss with its joint venture partner(s) how the principles set out in this Policy can best be implemented.
- c) Any individual or organization, who / which come into contact with TMCL during the course of conducting its business or transact with TMCL and also includes actual and potential suppliers, consultants, sales and other representatives, distributors, independent contractors and subcontractors, agents, advisers, joint ventures and government & public bodies (including their advisers, representatives and officials, politicians and political parties) ("**Third Party**"). These Third parties are required to comply with (in addition to the Thai Meira CoC.) the principles set out in this Policy. TMCL may also, in certain cases, expressly require such third parties to comply with all aspects of this Policy.
- d) Such other persons / entities as may be identified from time to time.

Collectively referred to as "**Relevant Personnel**".

Compliance with this Policy is of fundamental importance and is a condition of continued employment or association with TMCL. The Company shall have a strict "Zero-Tolerance" approach to any violations and any alleged breach will be investigated and disciplinary action taken as appropriate.

Failure to comply with this Policy may expose the Company to substantial risk and could jeopardize its operations and reputation. Company Personnel should also be aware that violations of this Policy may expose TMCL and / or employees and/or other associated/ third parties to criminal, civil and regulatory penalties including fines and imprisonment.

3. RESPONSIBILITY AND ACCOUNTABILITY

The maintenance, revision and distribution of this policy is the responsibility of all Management to ensure that the policy is effectively implemented throughout their respective business units, departments, divisions and locations

4. POLICY

Corruption is the abuse of entrusted power for private and usually commercial gain. In other words, it is the misuse of a public office or power for private gain or the misuse of private power in relation to business outside the realm of government. By wrongly benefiting a few individuals who abuse their power or position, corruption creates unfair competition, damages innovation and undermines integrity.

Because of the damage corruption does to the public good, nearly all countries outlaw any such practice. In addition, each country has its own set of Anti-corruption Laws that have to be followed. Nearly all anti-corruption laws prohibit an offer, payment, and promise to pay or authorisation of payment of any money, gift, or anything of value to any government official for purposes of:

- Influencing any act or decision of the government official,
- Inducing him or her to do any act in violation of his or her lawful duties,
- Securing an improper advantage, or
- Inducing him or her to use his or her influence with a governmental agency, in order to assist in obtaining or retaining business or to direct business to anyone.

In addition, according to the laws applicable in some countries corruption is considered a criminal offence even in the event that the payment of a bribe would not be made in order to assist in obtaining or retaining business. In other words, the act of corrupting someone in order to induce him or her to act or refrain from acting in the exercise of his or her functions is also considered a criminal offence.¹

Thai Meira Company Limited takes a zero-tolerance approach to corruption and is committed to carrying out its business with fairness, integrity, transparency and the highest possible ethical standards. The Company does not, either directly or indirectly, through intermediaries or other third parties, solicit, receive, offer, promise or provide any financial or other advantage of material value or otherwise exercise improper influence in its dealings with other businesses, or with government or public officials with the intention of obtaining any improper advantage in the conduct of its business.

All persons required to comply with this policy are responsible for ensuring that Thai Meira Company Limited business is undertaken with the utmost integrity with regard to the following matters:

- Prevention of Fraud and Extortion
- Bribery
- Facilitation Payments
- Gifts, Entertainment and Hospitality
- Donations (Political, Charitable and Social)
- Third Party Due Diligence
- Procurement Process
- Use of Company Assets

¹ Anti-corruption Laws do not just apply to the person who pays the bribe or offers anything of value – they also apply to the people who have taken action in furtherance of the same. For example, Anti-corruption Laws could apply to anyone who:

- approves or authorises the payment;
- creates or accepts false invoices;
- relays email instructions to pay or accept a bribe or kickback;
- covers up an illegal payment;
- knowingly cooperates in the payment of a bribe;

5. POLICY DETAILS

5.1 Prevention of Fraud and Extortion

Fraud and extortion are criminal offences. The Company prohibits the direct or indirect demand for or acceptance of any advantage, through deception or otherwise, which is used for the benefit of any employee, third party(ies), associated persons or the Company.

5.2 Bribery

The offering, paying, soliciting or accepting of bribes or kick-backs (including facilitation payments) to or from any person or entity whether in the public or private sector or government is strictly prohibited. The Company is committed to ensuring that no bribes, kickbacks or payments or advantages are solicited from or given to any person, whether in the public or private sector, for any purpose.

All Relevant Personnel are prohibited from:

- Giving or offering bribes, kickbacks, or similar payment or consideration of any kind, whether at home or abroad, to any person or entity (including but not limited to any customers or potential customers, government official, political party, candidate for political office or any intermediaries, such as agents, attorneys or consultants) and/or
- Accepting or receiving bribes, kickbacks, or similar payment or consideration of any kind, whether at home or abroad, from any person or entity (including but not limited to any customers or potential customers, government official, political party, candidate for political office or any intermediaries, such as agents, attorneys or consultants)

which is intended to, or which may be perceived as being intended to:

- Influence official acts or decisions of that person or entity or that of the Company
- Obtain or retain business or a business advantage for/ from, or direct business to / from, the Company
- Secure any improper advantage for the Company or to any entity that he/she represents.

5.3 Facilitation Payments

TMCL prohibits facilitation payments. The practice of providing facilitating payments directly or indirectly for or on behalf of the Company is strictly forbidden.

Facilitation Payments are known to be prevalent in many countries and industry sectors. There may be concerns, that the inability to make such payments may cause difficulties in doing business and that this may result in loss of income or contract.

The guidance given below intends to assist in circumstances when Facilitation Payments are demanded.

Guidance on how to avoid making Facilitation Payments.

Corrupt government officials demanding payments to perform routine government actions may often put people acting on behalf of the Company in very difficult positions. While there is no easy solution to the problem, the following steps may provide the necessary guidance:

- Insist on official receipts for any payments made
- Report suspicions, concerns, queries and demands for Facilitation Payments to superiors and senior management and to local enforcement authorities and refuse to make such payments

Exceptional Circumstances

While TMCL remains committed to its policy prohibiting Facilitation Payments, it recognises that there may be exceptional circumstances in which an official immediately threatens or compromises the personal safety and security of an individual concerned (or another) in order to procure such payment.

Any payment made under such exceptional circumstances must be reported immediately to the Head of Department Manager / Senior Department Manager (in case of Company Personnel) and Top Management. A record of such payment along with a description of the circumstances under which such payment was made must be maintained at all times.

5.4 Gifts, Entertainment and Hospitality

Gifts & Entertainment

All Relevant Persons are prohibited from providing or receiving gifts, entertainment or anything of value to any person or entity in connection with Company business unless it is provided or received in accordance with:

- This Policy,
- The Thai Meira Company Limited Code of Conduct,
- Entertainment and Hospitality Regulation

The Company acknowledges that the giving and receiving of nominal benefits (such as small gifts, meals and entertainment) is a common business practice and is intended to strengthen and build long term business relationships. All relationships with those who the Company deals with should be cordial, but must be on an arm's length basis. Nothing should be accepted, nor should the Relevant Person have any outside involvement, that could impair, or give the appearance of impairing their / its ability to perform his/her duties or to exercise business judgment in a fair and unbiased manner

Giving gifts and hospitality varies between countries and sectors and what may be normal and acceptable in one country may not be so in another. To avoid committing a bribery offence, the gift or hospitality must be:

- Reasonable and justifiable in all the circumstances
- Intended to improve the image of TMCL, present its products in a better manner or establish cordial relations

Before a benefit (whether given or received) can be considered proper and legitimate under this Policy, certain criteria must be met. In general, the benefit in question must:

- be bona fide;
- Be appropriate under the circumstances
- be moderate and reasonable;
- not embarrass TMCL by its nature;
- acceptable under the Laws and Customs ;
- be provided in accordance with this Policy, the Thai Meira Company Limited Code of Conduct;
- Does not include cash or a cash equivalent (such as gift certificates or vouchers)
- Is given openly, not secretly and in a manner that avoids the appearance of impropriety
- be fully documented;
- be supported by original receipts; and
- be accurately recorded in the Company's books and records.

All Relevant Personnel should familiarize themselves with the required approval processes and forms set out in the applicable policies. The Company's approval process considers not only the legal risks, but also, the Company image and business risks, that any proposed benefit may present to the Company.

Guidance Note

Given below are a few examples of what would not be considered as appropriate or acceptable whilst providing or accepting any Gift/ Benefit/ Hospitality.

- a) Accepting an offer of a gift of any size from any person/ entity which is in negotiation with, or is submitting a proposal with the Company.
- b) Giving, promising to give or offering any payment, gift, hospitality or advantage with the expectation or hope that a business advantage will be given or received or to reward a business advantage already given.
- c) Giving, promising to give or offering any payment, gift or hospitality to a government official, agent or representative to "facilitate" or expedite a routine procedure.
- d) Accepting or soliciting any payment, advantage, gift or hospitality from a person / entity that the Relevant Person knows or suspects is being offered with the expectation that it will obtain a business advantage for such.
- e)

These points are merely illustrative in nature and the fact whether any benefit or hospitality given / received is acceptable or appropriate shall be determined based upon the facts and circumstances of each case.

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Guidance

The following are some specific examples as to the Company's policy on the giving and receiving of gifts and entertainment. However, it should be noted that these are simply examples.

- a) Gifts
Gifts which bear the Company logo may be given as gifts.
- b) Moderate Meals
Meals are only considered to be acceptable if they are reasonable, moderate, and for a legitimate business purpose, and do not carry business obligations or present potential for embarrassment to the Company.

Travel and Hospitality

On occasion, the Company may receive requests to host the employees of customers or potential customers (who may or may not be government officials). Hosting refers to a situation where the Company pays for all or part of the travel expenses of a third party. It does not include a situation where the third-party pays for their own travel expenses to visit the Company or its sites, unless such payment is to be reimbursed by TMCL, whether in whole or in part.

All business travel and hospitality given or received must be moderately scaled and clearly intended to facilitate business discussions. As a general guideline, business entertainment in the form of meals and beverages is acceptable as long as it is in line with local laws and Company Policies.

Government Officials

Particular care must be taken with regard to Business Hospitality and Travel provided to government officials.

The Company may pay or reimburse government officials for reasonable travel and lodging-related expenses or costs directly related to:

- a) The promotion or demonstration of its products and services
- b) The entering into or execution of an MoU, Contract or Agreement between the Company and the Government which the government official represents, provided, that the payment or reimbursement of travel, entertainment and lodging expenses is permitted under local law and any other applicable laws and subject to the prior written authorisation of the concerned Vice President or above.
- c) In each case, the purpose of the trip must be defined and approved in advance and reimbursement is subject to “bona fide” supporting documentation and correspondence which must be kept on file.

Cash payments or per diems should be avoided and reimbursements for travel and lodging-related expenses should be paid to the government entity or agency rather than to the government official directly.

Family members of government officials may not be invited to such trips or events. If a family member nevertheless accompanies the relevant person to the trip or the event, TMCL will not pay or reimburse any expenses of such family member

5.5 Contributions and Donations

Political Contributions

The Company shall not directly or indirectly support any monetary or non-monetary contributions (donations of equipment, free technical services and the Employees donating their time during working hours, etc.) for specific political party or candidate or campaign.

In exceptional circumstances, if a contribution is made to support the democratic system, it must not be prohibited under any applicable law or made with the expectation of favorable treatment in return. Before making a contribution, a requisition form naming the recipients(s) and describing the purpose of the contribution, along with all other supporting documents, must be submitted to the Board of Directors for approval.

The Employees are able to participate in political activities under the terms of the Constitution, but they must not claim the status of being an employee of the Company or use any of the Company’s property or equipment for the purpose of political activities. If the Employees engage in political activities, there must

be no adverse impact on the business affairs of the Company and they must take particular care not to imply that they are acting on behalf of the Company in any way.

Social Contribution Payments

The Company may contribute or may sponsor events associated with the socio – economic development of communities in the geographies in which it operates. These payments may be charitable donations, training obligations, or social contribution payments. In addition, these contributions may either arise out of an agreement, be on a wholly voluntary basis.

Whether within or outside of a contract, all such types of payments must be transparent, documented, made in accordance with applicable local laws and assessed for compliance with this policy and any related procedures.

It should be noted that the existence of a contractual obligation or the fact that the payment is legal under any applicable local laws or regulations may not shield the Company from liability if it is proved that they are in violation with the provisions of specific Anti-corruption Laws in force in the geographies in which it operates.

Charitable Donations

As part of its Corporate Social Responsibility Policy, The Company may support local charities. The Company believes in contributing to the communities in which it does business and permits reasonable donations to charities.

However, the Company needs to be certain that donations to charities are not disguised illegal payments to government officials or others in violation of the Anti-corruption and other Laws in the various geographies it operates.

Before making any such contribution, The Company should ensure that:

- Such charitable contribution is not dependent on, nor made to win, a business deal.
- The contribution is always made to the Charity and not any particular individual.
- As far as possible, contributions should only be made to charitable organisations which are registered under the laws of the country.
- A thorough background check on the charity should be carried out in all cases especially to ensure that the charity does not act as a conduit to fund illegal activities in violation of Anti-money Laundering Laws , Anti-terrorism Laws and other applicable laws

Any donation to a charity by the Company should not create even the appearance of an impropriety or violation of any applicable laws or regulations.

Such charitable donations / payments should be approved by only the authorized employees as per the specified Authority Table. In addition, the authorisation should clearly lay out the limits of the amount that may be sanctioned by such employees. For charitable donations of a significant nature, the matter must be approved by the President and CEO. In any case, a statement showing the amount of such social and charitable contributions made must be placed before approval.

5.6 Third-party due diligence

The Company recognizes that there are circumstances in which relationships with third parties (such as agents and consultants) will be required or prudent from a commercial perspective.

However, public corruption often occurs when companies use third parties as intermediaries to obtain business or influence action on their behalf. Please note that anti-corruption laws in several countries do

not always differentiate between acts made by the Company or by someone acting on the Company's behalf.

As such, the Company can face liability under anti-corruption laws based on improper payments made by its subsidiaries, joint venture or other business partners, agents, consultants, referral partners, resellers, suppliers or anyone performing services on the Company's behalf, regardless of whether the Company had any knowledge of the improper payments. For that reason, it needs to be ensured that TMCL only deals with third-party intermediaries who are prepared to apply the same standards of business conduct as TMCL.

The Company expects all Third Parties doing business with it to approach issues of bribery and corruption in a manner that is consistent with the principles set out in this Policy. It is also essential that all Third Parties cooperate and ensure compliance with these standards, to continue the business relationship.

In circumstances where third-party relationships are required, the Company must choose its agents, consultants, referral partners, resellers and other representatives very carefully.

The following procedures must be followed whilst engaging any Third Party:

- a) Prior to entering into an agreement with any such third-party, appropriate due diligence must be performed in accordance with the existing policies and procedures to review the integrity records of any Third Party in light of the perceived levels of risk before entering a commercial relationship with them.
- b) The engagement process including the final approval of the selection of any Third Party should be fully documented and up to date records maintained.
- c) It is the responsibility of the relevant procurement, manufacturing, sales or support team looking to engage an agent, consultant, channel partner, reseller or any other representative to ensure that each such Third Party is fully briefed on this Policy and have made a formal commitment in writing to abide by it .
- d) All agreements entered into with Third Parties should include appropriate wording terminating the agreement in the event the Third Party (ies) fails to abide by this Policy

Company personnel, should never do through any third-party what they would not do themselves.

Authorising or encouraging any third-party, including a distributor, reseller or referral partner to pay bribes or engage in other misconduct is a violation of Company policy and anti-corruption laws. Even the knowledge of an improper payment or illegal activity can lead to civil and criminal liability against the Company and quite possibly for the individual with knowledge

In the event of any doubt on the integrity of a Third Party, it is the employee's responsibility to contact his / her Superior who.

5.7 Procurement Process

At all times the system of internal controls with regard to supplier/ vendor selection must be adhered to.

Supplier / vendor selection must never be based on receipt of a gift, hospitality or payment. The process of supplier / vendor selection must be properly documented at all times.

5.8 Use of Company Assets

Relevant Persons have a responsibility to protect the Company's assets from theft, loss, abuse, unauthorised use or disposal. They must use company assets only for purposes related to conducting

their official responsibilities and may use company assets for other (including personal) uses only when properly authorised.

6 RECORD – KEEPING AND INTERNAL ACCOUNTING CONTROLS PROVISIONS

a) Record-Keeping, Accounting & Payment Practices

Company Personnel must follow all applicable standards, principles, laws, regulations, and Company practices for accounting and financial reporting. In particular, Company Personnel must be timely, complete, and accurate when preparing all required reports and records.

Company Personnel must obtain all required approvals in accordance with the Gifts Policy and other applicable policies before providing any gift, entertainment, hospitality or travel.

Prior to paying or authorising a payment, Company Personnel should ensure that no part of such payment is to be made for any purpose other than is fully and accurately described in the Company's books and records.

All gifts, entertainment, or travel provided to a government official must be reported.

No undisclosed or unrecorded accounts of the Company are to be established for any purpose, and false or artificial entries are not to be made in the books and records of the Company for any reason whatsoever.

Finally, personal funds must not be used to accomplish what is otherwise prohibited by this Policy, The Gifts Policy or any of the Company's other policies.

b) Financial Control Systems, Accounting Requirements & Responsibilities

It is the Company's policy to maintain accurate, reasonably detailed records that fairly reflect its transactions and disposition of assets, regardless of whether the transactions are domestic or international.

Company Personnel are prohibited from making any false or misleading statements in Company books and records with regard to any matter covered under this policy nor shall they engage in any arrangement or provide any information that result in such prohibited acts.

The Finance Department/Division shall also maintain accounting procedures, financial reporting and controls with regards to matters covered under this Policy.

7. RISK ASSESSMENT AND EVALUATION

In furtherance of this Policy and the various policies and procedures implemented from time to time thereunder, the Company will conduct, via internal, regular and confidential assessments.

These assessments are designed to prevent and detect violations of this Policy.

The assessments shall focus on the following:

- a) Evaluating exposure to corrupt activity (Risk assessment)
- b) Evaluating the efficacy of the policy in managing the Company's corruption (Risk Assessment)
- c) Evaluation of the Company's strategy to ensure compliance with the Policy and applicable anti – corruption laws
- d) Effectiveness of monitoring mechanisms
- e) Effectiveness of due diligence procedures undertaken prior to entering into arrangements with third parties; and

These assessments should also include a review of the Company's books and records maintained by the Finance Department/Division pertaining to the entertainment, gift, and travel expenditures by Relevant Personnel on behalf of the Company. In addition, the regular audits should encompass records pertaining to social payments and donations to charities.

8. INVESTIGATION

In addition to the regular assessments described above, there may also be individual instances in which the Company may wish to investigate a certain matter.

Such investigations by also be undertaken by a written directive of the Board of Directors.

The investigation shall include an examination of the Company's records, books and accounts and such other documents as may be required. While performing this investigation, the assessment team may obtain the assistance of any Company Personnel, and is authorised to retain accounting firms, external counsel, independent consultants or such other parties as may be deemed necessary.

9. SUMMARY OF RESPONSIBILITY

It is the Company's intention to ensure that all Relevant Personnel comply with the requirements set out in this Policy. This Policy should be read in conjunction with the Thai Meira Company Limited Code of Conduct and other Company policies and procedures.

The Finance Department/Division is responsible for maintaining and enforcing the Company's accounting and record-keeping policies, and maintaining the Company's system of internal controls to ensure that assets of the Company are adequately protected as envisaged under this Policy and other applicable Company policies, practices and procedures.

At any time, assistance may be taken from the Legal and when required.

10. BREACHES AND REPORTING OF VIOLATIONS

"Violations of this policy, including involvement in any corrupt activities and failure to report actual or potential breaches of this policy (or its associated procedures), will lead to disciplinary action in accordance with applicable procedures"

Breaches

Violations of this Policy will not be tolerated. Any Relevant Personnel who violates this Policy will subject to disciplinary action up to and including termination of employment (in case of Company Personnel) or relationship with the Company (in case of Third Parties).

Reporting of Violations

The Company is committed to reporting all instances of corruption and other forms of dishonesty to the relevant authorities and to facilitating criminal action against the individuals concerned where appropriate. The Company also reserves the right to proceed against the violator individually for any losses arising from such actions.

It is the responsibility of all Relevant Persons to report any breaches, or potential breaches, of this Policy to their Section/Department Manager and above or other person to whom they report or through the whistle blowing facility.

It should be noted that in certain circumstances, failure to report actual or suspected violations of this policy may itself constitute a legal offence.

Wilful blindness

Turning a “Blind – eye” to a suspected violation can result in criminal penalties and civil liability both for the Company and for individuals.

If anyone wilfully ignores or turns a blind eye to any evidence of corruption or bribery within the organisation, action shall also be taken against such person. Although such conduct may be “passive”, i.e. the person concerned may not have directly participated in or may not have directly benefited from the corruption or bribery concerned, the wilful blindness to the same can, depending upon the circumstances, carry the same disciplinary action as the intentional act.

Violations or suspected violations should be reported in the first instance to the Section/Department Manager and above where such violation has taken place or other person to whom they report. For those who wish to remain anonymous, the violation may be reported in accordance with the procedures set out in the Company’s Whistleblower Policy.

11. NON – RETALIATION POLICY

The Company will not take any adverse action against anyone for providing truthful information relating to a violation of law or Company policy. The Company shall not tolerate any retaliation against persons asking questions or making good faith reports of possible violations of this Policy.

Anyone who retaliates or attempts to retaliate will be disciplined. Any person who believes he or she has been retaliated against may use the Confidential Reporting System as provided in the Whistle Blower Policy.

12. QUERIES AND ASSISTANCE

Queries and assistance about this Policy can be directed to the Top Management.

Appendix : Glossary and Guidance

1). Bribe

A bribe is an inducement, payment, reward or advantage offered, promised or provided to any person to influence his / her actions or decisions in order to gain any business, commercial, contractual, regulatory or personal advantage.

A bribe may be anything of value including cash, gifts, inside information, favours, corporate hospitality or entertainment, offering employment to a relative, payment or reimbursement of travel expenses, charitable donation or social contribution etc. It should be noted that the bribe may not always be of a large value.

Some examples of bribes are as follows. This is not an exhaustive list:

- a) Lavish gifts, meals, entertainment or travel expenses, particularly where they are disproportionate, frequent or provided in the context of on-going business negotiations
- b) The uncompensated use of company services, facilities or property
- c) Cash Payments
- d) The provision of a benefit, such as an educational scholarship or healthcare, to a member of the family of a potential customer/public or government official;
- e) Providing a sub-contract to a person connected to someone involved in awarding the main contract.
- f) Engaging a local company owned by a member of the family of a potential customer/government official.

2). Bribery

Bribery is the direct or indirect offering, promising, giving, accepting or soliciting of a financial or other advantage that results in an activity being performed improperly (for example in breach of trust, in bad faith or in a biased manner).

The advantage may have been offered or received, or the improper performance undertaken, directly or indirectly (for example, via a customer, agent, intermediary or supplier). The improper activity may be connected with TMCL's business (including the activity of employees or third parties working on behalf of TMCL) or with the functions of government or other public bodies.

Bribery is unlawful in many jurisdictions in which TMCL operates. TMCL prohibits all forms of bribery.

3). Corruption

Corruption is a broad term covering a wide range of wrongdoings on the part of an authority or those in power or those entrusted with significant authority through means that are illegitimate, immoral or incompatible with ethical standards e.g. theft, bribery, fraud etc.

In other words, Corruption is the misuse of entrusted power (by heritage, education, marriage, election, appointment or any other means) for private gain.

Corruption is traditionally associated with a public official abusing her/his position. However, corrupt practices can also occur within the private sector when a private sector employee abuses of her/his position in the private entity for personal gain.

4). Facilitation Payments

Facilitation payments are small payments made government officials in exchange for providing a service to which the payer is entitled even without the payment.

These payments are generally made in order to expedite or secure the performance of “routine governmental actions,” which are limited to a narrow range of non-discretionary acts that are ordinarily and commonly performed by a government official.

Facilitation payments are illegal in almost all countries, including Thailand.

5). Government Official

A “Government Official” includes any official or employee of a government or government-owned enterprise, any official or employee of a government agency or regulatory authority, any political candidate or member of a political party, any public international organisation, any official or employee of a public international organisation (e.g. United Nations, World Bank), or any person acting in an official capacity for or on behalf of any of the foregoing. Government includes local, regional, and national governments and the legislative, judicial, administrative and executive branches.