

Anti-Corruption & Bribery Policy

AEON Thana Sinsap (Thailand) Public Company Limited

AEON Thana Sinsap (Thailand) Public Company Limited (the "Company") is against and does not accept corruption in any form. The Company has prescribed anti-corruption & bribery procedures for its activities to comply with this policy and will regularly review whether these procedures comply with the relevant laws and maintain the Company's reputation. All the employees, subsidiaries and parties involved with the Company must strictly comply with this policy.

Objectives

This policy has been established to ensure that all employees of the Company and its subsidiaries comply with the anti-corruption & bribery measures, and shall review the practices, roles, responsibilities, risk management systems and internal control and audit measures to anti-corruption & bribery and prevent fraud within the Company.

The Board of Directors is responsible for establishing policies and overseeing the implementation of an effective anti-corruption & bribery system. This ensures that the Company recognizes and prioritizes the importance of combatting corruption, while fostering and embedding it as part of the corporate culture.

Definitions

Corruption shall mean any exploitation that is unlawful, whether by offering, promising, soliciting, demanding, giving or accepting bribes, assets or any other benefits or behavior associated with corruption with government officials, government agencies, or any parties related to the Company, whether directly or indirectly, for those parties mentioned to perform or refrain from performing their duties; and to acquire, maintain or keep any other inappropriate business interests except when acceptable by the laws, regulations, local traditions or trade practices.

Bribery shall mean a form of Corruption, involving the act of offering, giving, or receiving any form of benefit, whether monetary or non-monetary, with the intent to improperly influence the actions, decisions, or behaviors of individuals in positions of responsibility. It also extends to facilitation payments, which are monetary or non-monetary items offered to accelerate or secure certain operations. Such actions, whether conducted directly or indirectly, are considered unethical and often violate legal and organizational standards.

Embezzlement shall mean the act of dishonestly taking or misusing funds, assets, or resources entrusted to someone, usually for personal gain.

Entertainment and Gifts expenses shall mean the expense for activities to establish good relationships which include accommodation fees, business-related fares, business visits or food and drink.

Facilitation payment shall mean the money, objects, prizes or any other things given to conduct favorable actions, whether directly or indirectly, to facilitate or accelerate any operations.

Anti-Corruption & Bribery Policy

- The Company has a policy to conduct business in good faith with honesty, transparency and ethical principles by focusing on fostering the attitude among its employees to oppose, correct and be responsible for corruption issues, including communicating the knowledge, understanding to all employees and performing tasks honestly and in accordance with the policy.
- The Company does not accept any corruption activity which may be an offence under the law and is committed to conduct business with integrity, honesty, and fairness according to the Company's commitment to prescribe and enforce effective anti-corruption & bribery measures.
- The Company will cooperate and support anti-corruption & bribery activities by promoting and participating in monitoring, auditing and having mechanisms to monitor and control the exercise of power to be appropriate, transparent and efficient as well as to act in compliance with the anti-corruption laws.
- The Company shall set the standard for the investigation procedure for trials to be effective and in compliance with the operation of the appointment of the Disciplinary Working Team and operation for appointment of the Disciplinary Working Team for Fraud Case which are considered part of this policy.
- The Company shall establish a standard investigation procedure to ensure its effectiveness. The board of directors and the management shall conduct an annual review of the policy to ensure its ongoing suitability, adequacy, and effectiveness.

Roles and Responsibilities

- The Board of Directors is responsible for approving the Policy of Anti-Corruption and Bribery. Additionally, the Board establishes the direction for the Anti-Corruption and Bribery Policy and provides oversight at the Board level.
- The Audit Committee is responsible for the revision of the financial and accounting reporting system, internal control, internal audit and risk management system to ensure that they are succinct, appropriate, modern, efficient and in line with international standards. The Audit Committee also collaborates with the Risk Management Committee and the Corporate Governance (CG) Committee, and/or other department that may be involved, to ensure a comprehensive approach to anti-corruption risk oversight.
- The Executive Committee and senior executives are responsible for forming the system to promote and support the - & bribery policy to communicate this policy to all employees and relevant departments and review the suitability of the system and measures and search the anti- corruption & bribery measures that conform to the changes in business, regulations, rules and laws.
- The supervisors at all levels are responsible for ensuring that all employees under their supervision are aware of and understand this policy, and they regularly review their knowledge of the policy.

- All employees at all levels are appointed to:
 - Strictly adhere to the organization's guidelines on anti-corruption and bribery.
 - Promptly report any suspected or confirmed incidents of bribery, corruption, or unethical behavior through the designated reporting channels.
 - Refrain from activities that may create or appear to create conflicts of interest, ensuring decisions are made ethically and transparently.
 - Actively engage in anti-corruption and bribery training sessions to enhance understanding of relevant policies and regulations.
 - Foster a work environment that values honesty, transparency, and accountability, setting an example for ethical behavior across the organization.