



Anti-Corruption Policy

Asia Sermkij Leasing Public Company Limited (“The Company”) and its subsidiary have the guidelines on doing the business with code of conduct according to the good corporate governance, and adhere to the social responsibility and all stakeholders. The Company has prepared an anti-corruption policy to define the responsibilities, practical guidelines, preventions and anti-corruption leading to the development of the sustainable organization. It has disclosed information to the public on the anti-corruption measures via the company’s website www.ask.co.th and its e-Policy, which is the internal communication system of the Company.

Purpose

1. To show the intention and determination of the Company in all forms of anti-corruption.
2. To designate the guidelines for directors, management, including employees to acknowledge and practice in anti-corruption.

Scope

This policy is applicable with all the employees, which covers from directors, management and employees, regardless of the regular or temporary employees (collectively called “Employees”) of Asia Sermkij Leasing Public Company Limited and its subsidiary.

Definition

1. “Corruption” means the abuse of authority to give, demand or receive the undue benefit for the interest of self, family or acquaintance except it is the case that is allowed by the law, rule, notice, regulation, custom and tradition or business practice so can be made.
2. “Political Contributions” mean giving assets, rights or other benefits in any forms as help, support or other interests to a political party, politician or person related to politics, including giving to political activity, regardless of directly or indirectly.
3. “Facilitation payment” refers to a small amount of expenses unofficially offered to the government employee or government official. addition, it is deemed an offering to make certain that such government employee or government official will proceed according to the procedures or an offering with the aim to speed up faster action in which such procedures do not necessarily depend on the judgement of the government employee or government official and is considered an act of duty of such government employee or government official as well as deemed a right to which any legal entities shall be entitled; for example, request for an authorization, certification and receipt of any public services etc.



4. "Public Official" means a political office-holder; a government official or local government employee holding a permanent position or receiving a regular salary; an employee or person performing duties in a state enterprise or government agency; a local administrator and a member of a local assembly who is not a political office-holder; or an official under the law on local administration. "This shall also include directors, subcommittee members, and employees of government agencies, state enterprises, or state agencies, as well as any person or group of persons exercising or assigned to exercise state administrative power in performing any act pursuant to the law, regardless of whether established within the bureaucracy, state enterprises, or other state affairs. This shall further include any person who formerly held a position or performed duties as a state official under this definition, and who has vacated office or retired."
5. "Bribery" means the offering, giving, receiving, or soliciting of something of value to influence the actions of an official or other person in charge of a public or legal duty. It includes various forms of bribes and involves relevant parties such as state officials, business partners, and third parties.
6. "Cash and Cash Substitutes" means
 - Banknotes, coins, and checks.
 - Unlisted shares or listed shares are considered cash, even if the value of such shares cannot be determined but may yield future profits. Private placement investments in equity securities are considered cash, regardless of the investment category.
 - Gift certificates, gift cards, vouchers, e-money, and other cash coupons that can be used to purchase goods and services.
 - Beer coupons, book coupons, hotel coupons, travel coupons, and other coupons that can be used to purchase specific goods and services.

Duties and Responsibilities

1. Board of Directors has a duty and responsibility to determine the policy and oversee the establishment of the anti-corruption system with suitability and efficiency to ensure that the management prioritizes the Company's anti-corruption and promotes anti-corruption practice to become an organizational culture on the good corporate governance.
2. Audit committee has a duty and responsibility to review the Company's internal audit and risk management system to comply with the suitable anti-corruption guidelines, including may agree to assign an authority or hire a consultant to investigate corruption independently.
3. Management has a duty and responsibility to promote and support the anti-corruption policy by communicating with employees and reviewing on suitability of the system and measures to be consistent with a changing business.



4. Internal audit department has a duty and responsibility to examine, review the operations to ensure that the Company has the suitable and sufficient control system to prevent the corruption risk, and also report to audit committee in case of unusual situation.
5. Head of Department has a duty and responsibility to determine the control system as well as promoting and supporting the anti-corruption policy in the responsible department to ensure that there is an efficient practice to prevent or mitigate the corruption risk.
6. Employees have a duty and responsibility to comply with the anti-corruption policy. If there is a doubt or encounter with the violation of this policy, employees shall notify superiors for acknowledgement or the channel specified in this policy immediately.

Practical Guidelines

The directors, the management and all the employees of the Company and its subsidiary have to comply with the anti-corruption policy and the Company's code of conduct by not participating in all forms of corruption, regardless of directly or indirectly. The Company prioritizes the prevention of corruption and exploit of undue benefit for themselves or others as follows:

1. Giving or receiving a Gift or Entertainment

- 1.1 The employees are prohibited to demand, offer, receive, or give a gift, entertainment or other benefits in form of money or other kind from/to the business participants as a bribe except receiving or giving a gift according to festive occasions or traditional norm which may not affect the recipient's business decision-making.
- 1.2 In case that an employee has received a gift according to festive occasion or traditional norm exceeding the normal value from business participants, he/she shall report to the hierarchical superior.

2. Political Contributions, Charity Donation and Sponsorship, Revolving Door

2.1 Political Contributions

- 2.1.1 The Company has the policy to maintain neutrality in politics by not taking any actions which show loyalty towards any particular parties as the following employee practices:
 - (1) Employees should exercise their rights as good citizen in Accordance with the constitution law and other relevant laws.
 - (2) Employees have personal rights to attend political activity During non working hours, but shall not claim as the Company's employees or participation on behalf of the Company.
 - (3) Employees are prohibited to attend any activity that may cause misunderstanding that the Company has involved or given political contributions or showed loyalty towards any particular parties.



- (4) Employees are prohibited to use any assets, equipment or tools of the Company for a political contributions.

2.2 Giving a Charity Donation

- 2.2.1 Giving a charity donation shall be made on behalf of the Company to any reliable organization with the objective to benefit the society.
- 2.2.2 Giving a charity donation must be proceeded with evidence and Transparency through verification and approval procedure according to the Company's policy and legal.
- 2.2.3 The evidence for charity donation must be kept for later audit.

2.3 Sponsorship

- 2.3.1 Giving sponsorship, regardless of money, object or asset to any activity or project to promote business or good image of the Company's and its subsidiary, shall be proceeded with transparency through verification and approval procedure according to the Company's policy and legal.
- 2.3.2 Giving sponsorship must be proceeded with evidence and stored evidence for inspection later.

2.4 Revolving Door

- 2.4.1 The Company maintains a strict policy against paying facilitation fees in any form, directly or indirectly. The Company will not engage in, nor tolerate, any actions aimed at facilitating business operations in exchange for such payments.
- 2.4.2 The company shall disclose information on the employment of government employee or government official coupled with reason of appointment in the 56-1 One Report or Other Public Disclosures for transparency purposes.
- 2.4.3 A cooling-off period of two years shall be established for the appointment of former state officials who have vacated office, or individuals who previously worked for regulatory agencies directly associated with the Company.
- 2.4.4 A background check (due diligence) process is conducted for candidates being recruited as directors, advisors, and executives to identify potential conflicts of interest prior to their appointment.
- 2.4.5 Government officials appointed by the company are prohibited from abusing their power or engaging in conflicts of interest, such as disclosing confidential information from their former agencies, engaging in illicit lobbying, or being assigned to contact their former agencies.

2.5 Business relations and procurement with public and private sectors

Any offering or accepting of bribery is prohibited in all business activities. Any dealing with public and private sectors shall be transparent, honest, and in compliance with relevant laws.



2.6 Third Parties Intermediaries (TPIs)

The Company enforces appropriate oversight of TPIs and strictly prohibits employees or TPIs from giving, offering, or promising to give money, assets, or any other benefits to government officials, customers, business partners, or any individual to secure improper business advantages. The Company maintains a zero-tolerance policy toward all forms of corruption, whether committed by employees or TPIs acting on behalf of the Company. Providing anything of monetary value to government officials, current or prospective customers, or any other individuals is strictly prohibited.

3. Control of Corruption

- 3.1 The Company provides appropriate segregation of duty, in order to prevent one individual to be responsible from the beginning to the end of process with proper job assignment authorized by the hierarchy.
- 3.2 The Company provides appropriate job rotation to the employees who continue one position for long time to avoid corruption risk.
- 3.3 The Company ensures that all the employees understand the Company's code of conduct and providing with training of the anti-corruption policy and practical guidelines, including other training related to the anti-corruption, if necessary.
- 3.4 The Company prepares a whistle blowing procedure to report suspect information of corruption or action that breaches the policy with accuracy, convenience, and safe for the employees and outsiders.
- 3.5 The Company encourages employees to report corruption allegation in good faith, not for personal gain which may lead to disciplinary action.

4. Complaint and Measures on Protection of Evidence and Complainant

- 4.1 In case there is doubt or encountering an offence that may fall into the violation of this policy, the employee has to report to the superior promptly, or report via the channel according to the "whistle blowing policy."
- 4.2 The Company shall give fairness and protection to the employee who reports suspect information of corruption by using the protection measures for the complainant, or giving cooperation on the report of the corruption as specified in the policy on whistle blowing.
- 4.3 When receiving a suspected report of corruption, the Company shall immediately prevent evidence from theft, change or destruction by moving the evidence to a safe place, limiting the right to access the evidence-storing place, etc. To terminate the security guarding, the evidence shall be kept with sufficient security until the internal audit concludes the result.
- 4.4 All participants shall keep the details and the results of the investigation confidential, and be prohibited from disclosing the information to unauthorized persons.



5. Human Resources (HR)

- 5.1 The Company has designated the anti-corruption policy as part of the human resources (HR) management covering the process on recruitment, training, performance evaluation, compensation and promotion, which reflect the Company's intention towards the anti-corruption.
- 5.2 The Company has assured that there will be none of its employees be demoted, punished or given a negative result to those who refuse corruption, although it may cause the Company to lose the business opportunity.
- 5.3 The Company shall ensure regular communication, training, and refresher sessions on its Anti-Corruption Policy, Whistleblowing Policy, and Whistleblower Protection Measures for directors, executives, and employees. All employees must receive such refresher training at least every two years, while employees in departments or roles with a high risk of fraud and corruption must undergo refresher training annually.

6. Violation of the Policy

- 6.1 The Company shall punish the employee who violates this policy, in which The punishment shall comply with the rules on the discipline of the Company such disciplinary actions include termination of employment, should the Company deem it necessary and/or the relevant law.

7. Assessment of the Risk from Corruption

- 7.1 The Company has provided the preventive and control measures for the corruption risk to comply with business ethic and good corporate governance.
- 7.2 The Company shall conduct regular corruption risk assessments, considering risk factors related to the nature of business operations, business partners, customers, government agencies, and relevant stakeholders, in order to utilize the assessment results to establish appropriate control measures.

8. Monitoring and Reviewing of the Anti-Corruption Policy

- 8.1 The company shall review the compliance with anti-corruption policy periodically.
- 8.2 The company shall review the anti-corruption policy, practical guidelines and other policies to be consistent with the change of business, rules, regulations and legal requirements.
- 8.3 The Company shall arrange for the reporting of anti-corruption performance, policy compliance audit results, whistleblowing statistics, and relevant key issues to the Board of Directors at least once a year, for their acknowledgment and to ensure effective oversight of operations.

9. In case there is a doubt on the anti-corruption policy, the employees shall contact for advice from the superior or the human resources (HR).