

Anti-Corruption Policy

Pro Inside Public Company Limited

Pro Inside Public Company Limited Anti-Corruption Policy

Pro Inside Public Company Limited (“Company”) operates its business with transparency, adheres to correctness, and places importance on anti-corruption by providing guidelines for anti-corruption, including supporting activities that promote and instill in directors, executives, and employees to comply with laws and related regulations, and not support the creation of work success through corruption. The Board of Directors therefore has an anti-corruption policy to set clear guidelines for business operations in line with the principles of good corporate governance, the Company’s code of ethics, regulations, requirements, and related laws in order to develop into a sustainable organization.

Objectives

1. To ensure that all levels of the company's employees are not involved in any form of corruption.
2. To promote the role and participation of employees to prevent and combat corruption related to the company's business.
3. To build confidence among stakeholders in conducting business together with honesty and integrity.

Scope

The Company defines the scope of stakeholders involved in the anti-corruption policy into 2 groups as follows:

1. Internal consisting of the Board of Directors, the Executive Committee, and all levels of the Company's employees.
2. External consisting of customers, suppliers of goods or services, business partners, competitors, creditors, debtors, government agencies, private agencies.

Definition

Corruption means the act or omission of an act in a position or the abuse of power in a position in any form, whether it is giving or receiving a bribe, presenting or promising to give, requesting or demanding assets, money, things, rights or other benefits that are contrary to morality, ethics and laws, rules, regulations, policies to government officials or other persons doing business with the Company or companies in the group, whether domestically or internationally, in order to obtain undue benefits for the organization, oneself, family, friends and acquaintances.

Responsibilities

1. The Board of Directors is responsible for setting policies and overseeing the establishment of an effective anti-corruption system to ensure that the management is aware of and places importance on anti-corruption and instills it as an organizational culture.
2. The Executive Board is responsible for setting up a system, promoting and supporting the anti-corruption policy to communicate to employees and related persons, and reviewing it to ensure its appropriateness and consistency with changing situations, such as business conditions, regulations, rules and requirements of various laws, etc.
3. The Audit Committee is responsible for reviewing the financial and accounting reporting system, internal control system, internal audit system and risk management system to ensure that it complies with international standards, is rigorous, appropriate, up-to-date and effective.
4. The Head of Internal Audit is responsible for inspecting and reviewing the operations to ensure that they are correct and in accordance with policies, practices, operating authority, regulations and laws, and requirements of the regulatory agency to ensure that the control system is appropriate and sufficient for the risk of corruption that may occur, and reporting to the Audit Committee.
5. The Board of Directors, executives and employees are responsible for complying with the anti-corruption policy by not being involved in corruption. Directly or indirectly
6. Subsidiaries, affiliates or business representatives of the Company that the Company has control over must agree to comply with the Company's anti-corruption policy.

Anti-Corruption Policy

1. Create awareness, values, and attitudes for employees to work according to the rules and regulations with honesty and integrity, and not to neglect or ignore. When encountering any corruption-related acts related to the company, they must notify their supervisor or the person in charge and cooperate in the investigation of the facts. If there are any doubts or questions, they must consult their supervisor or the person assigned to be responsible through the channels specified in the whistleblowing policy.
2. Establish an efficient and effective internal control system with appropriate checks and balances on the use of power to prevent employees from committing fraud or being involved in fraud and corruption.
3. The company's directors, executives, and employees are prohibited from taking any action that is a request for or accepting property or other benefits for themselves or others that may induce them to perform or refrain from performing their duties in an improper manner or may cause the company to lose its legitimate benefits.

4. The company's directors, executives, and employees are prohibited from giving or offering to give property or other benefits to an outsider to induce that person to perform or refrain from performing any action that is against the law or inappropriate for their position.

Anti-Corruption Guidelines

1. The Company will support and encourage all levels of personnel to recognize the importance and have awareness in resisting corruption, including providing internal control to prevent corruption, giving or receiving bribes in all forms.
2. This guideline for resisting corruption and corruption covers the personnel management process, from recruiting or selecting personnel, promotion, training, performance evaluation and compensation to employees. Supervisors at all levels are required to communicate and understand with subordinate employees to apply in business activities under their responsibility and supervise the implementation to be effective and consistent with this guideline.
3. The Company will provide fairness and protect employees or other persons who report clues or evidence of corruption related to the Company, including employees who refuse to act, by using measures to protect complainants or those who cooperate in reporting corruption as specified in the Whistleblower Policy.
4. Those who commit corruption are considered to have committed an offense under the regulations on personnel management for employees, which will be subject to disciplinary action as specified, including possible legal punishment if the action is illegal.
5. The Company will regularly review its guidelines and operational measures to comply with changes in the law and business conditions

Rules of Practice

The Company's directors, executives and employees must strictly comply with the anti-corruption policy and business ethics, regardless of whether they are directly or indirectly involved in corruption.

1. Do not engage in any behavior that indicates accepting bribes or bribing stakeholders in matters for which they are responsible, either directly or indirectly, to obtain improper benefits. Company personnel must exercise guidelines as follows:
 - 1.1 Do not accept or give gifts, souvenirs in the form of cash, checks, bonds, stocks, gold, gems, real estate or similar items, in both government and private agencies.
 - 1.2 Do not accept any assets, items, gifts, presents or other benefits that would induce neglect of one's duties. Before accepting souvenirs, make sure that the law and the Company's regulations have been complied with. Items or gifts given in the course of one's duties should not be expensive and appropriate for each occasion.

- 1.3 Do not provide any property, items, gifts, presents, or other benefits to induce decision-making or cause the recipient to not comply with the same trading practices as other customers. The giving of items on occasions or occasions must not be of a value that exceeds normal circumstances.
- 1.4 Do not act as a medium in offering money, assets, items, or other benefits to those involved in businesses, government agencies, or any organizations in exchange for undue privileges or cause government officials to refrain from complying with the rules, regulations, and legal practices as specified.
2. Procurement must be conducted through the company's regulations, be transparent, auditable, and must be conducted in accordance with relevant laws.
3. Expenses for business entertainment and other expenses related to the performance of business contracts can be made, but must be spent reasonably and auditable.
4. In making charitable donations, must exercise guidelines as follows:
 - 4.1 The use of the company's money or assets for charitable donations must be made in the name of the company only. Charitable donations must be made to foundations, charitable organizations, temples, hospitals, nursing homes, or organizations for the benefit of society that have certification or are reliable, auditable, and must be made through the company's regulations.
 - 4.2 Charitable donations in personal names can be made, but must not involve or create suspicion that it is a corrupt act for any other benefit.
5. The use of the company's money or assets to support the project must be specified in the name of the company only. The money paid must be for the purpose of business, good image and reputation of the company. The disbursement must specify the purpose clearly and have verifiable evidence and proceed through the steps according to the company's regulations.
6. Do not perform any action related to politics within the company and do not use any resources of the company to do so. The company is an organization that adheres to political neutrality, supports compliance with the law and democratic governance, and has no policy of providing political assistance to any political party, whether directly or indirectly.
7. If any corrupt or fraudulent actions are found that are directly or indirectly related to the Company, such behavior must not be ignored or ignored. The Company should immediately notify the Board of Directors, Executives or Managing Director or report through the whistleblowing channels as specified in this policy.
8. Directors and Executives must be aware of the importance of disseminating, providing knowledge and providing advice to create understanding among subordinates about anti-corruption so that employees can comply with this anti-corruption policy and be good examples of honesty, ethics and code of conduct.

Raising Concerns (“Whistle-blowing”)

1. Corruption related to the organization, both directly and indirectly
2. Actions that are against the company's procedures or have an effect on the company's internal control system, leading to suspicion that it may be a channel for corruption
3. Actions that cause the company to lose benefits or affect the company's reputation
4. Actions that are illegal, immoral, or unethical

Whistleblowing or grievance reporting

The Audit Committee will be the recipient of complaints about suspicious acts of corruption occurring with the Company, either directly or indirectly, through the channels specified in the Whistleblower Policy as follows:

1. Email : whistle-blower@proinside.co.th
2. Postal mail : To The Audit Committee of Pro Inside Public Company Limited
55, A.A. Capital Ratchada Building, 5th Floor, Ratchadapisek Road, Dindaeng, Dindaeng Bangkok 10400
3. Online channel : <http://www.proinside.co.th/contact/whistleblowing>

Persons who can report clues or complaints about corruption are all stakeholders of the Company, including shareholders, customers, competitors, creditors, the government sector, communities, society, executives and employees of the Company. Regardless of the method of reporting as mentioned above, the Company will keep the information of the informant confidential.

Protection

1. Reporters or those who cooperate in the investigation of information are not required to reveal themselves if they believe that revealing themselves may cause insecurity or have any impact on themselves or their close friends.
2. Any information that can identify the whistleblower or the person who cooperates in the investigation of the information will be kept confidential. The Company will proceed with the necessary care for the benefit of the fact-finding process, taking into account the safety and impact on the whistleblower, the person who cooperates in the investigation of the information, and the relevant persons.
3. The whistleblower and those who cooperate in the investigation of information or provide information honestly will not be subject to disciplinary action, blame, reduction in salary, demotion, or reduction in position of any employee for the employee having provided information to the company honestly and truthfully, not slandering others, and will be protected from actions that cause impact or insecurity, such as intimidation, threats, delay, work disturbance, or actions that are harassment or unfair treatment.
4. The Company will not demote, punish or give negative consequences to employees who refuse to commit corruption, even if such action causes the Company to lose business opportunities.

5. If the whistleblower or the person who cooperates in the investigation believes that you have been threatened, intimidated, detained, interfered with work, or acted as a form of harassment or unfair treatment, You should report through the above whistleblowing channels. The whistleblower or the person who cooperates in the investigation can request the Company to establish any additional appropriate protection measures.

Penalties

If directors, executives and employees violate, neglect, omit or intentionally commit an offense according to the anti-corruption policy and the guidelines mentioned above, it is considered a disciplinary offense. The Company will consider punishment according to the work regulations set by the Company and the compensation for damages to be paid to the Company or those affected by such actions. If the action is against the law, the Company will consider taking action in accordance with the relevant laws as well.

Dissemination of the anti-corruption policy

For everyone in the organization to be aware of the anti-corruption policy, the Company will proceed as follows:

1. The Company will post an announcement of the anti-corruption policy for all employees to be aware of.
2. The Company will publish the anti-corruption policy through the Company's communication channels, such as e-mail, the Company's website, annual report, etc.
3. The Company will arrange for a regular review of the anti-corruption policy.

Approved by the Board of Directors Meeting No. 3/2024

On February 27, 2024