

# Anti-Corruption Policy

General Environmental Conservation Public Company Limited

**genco**

We care about the environment.

เจนโก้ จริงใจ ห่วงใยสิ่งแวดล้อม



# Anti-Corruption Policy

The Company carries out business operations and gives importance to corporate governance within the framework of management with good ethics, transparency and accountability, especially in processes involved with or at risk for corruption within the organization, including all forms of corruption whether direct or indirect.

## Definitions

Corruption refers to using the bribes, conducting one's duties, exerting one's power improperly and/or using of information obtained from the operating functions of the company to any action conducive to themselves, their own partisan advantage and/or others in order to acquire the property or the other interests improperly, or any wrongful benefit for themselves, both directly and indirectly, or any receiving benefits which they are not entitled, causing damage to the interests of others.

## Anti-Corruption Policy

All of the Company's directors, executives, employees and hired workers are forbidden from performing any actions associated with every form of corruption for direct and indirect benefits as recipients, providers, or persons offering monetary or non-monetary bribes to public or private agencies with which the Company has business dealings or contact and all of the bovementioned persons must strictly comply with anti-corruption policies.

## Duties and Responsibilities

1. The Board of Directors has a duty and responsibility to set policies and govern to ensure effective systems supporting anti-corruption efforts in order to ensure awareness and importance given to anti-corruption efforts by the management.
2. The Audit Committee has a duty and responsibility to review the financial and accounting report system, the internal control system and the internal audit system to ensure all is compliant with international standards, concise, suitable, modern and efficient.
3. The Managing Director and the Management Team have a duty and responsibility to prescribe systems, promote and support anti-corruption policy to communicate with employees and other people involved in addition to reviewing system and measure suitability for concurrence with changes in business, rules, regulations and specifications of the law.

## **Guidelines for Compliance with the Anti-Corruption Policy**

1. The Company's directors, executives, employees and hired workers, including subsidiaries, are forbidden from directly and indirectly performing, accepting or supporting corruption. Compliance with the anti-corruption policy must be regularly reviewed and practice guidelines must be reviewed for concurrence with the aforementioned policy.

2. Procurements must comply with the procedures prescribed in Company regulations with transparency and accountability

3. Spending to support business visits and spending related to compliance with business agreements are permitted. However, spending must be reasonable with accountability.

4. Use of the Company's funds or property for charitable donations may be performed only on behalf of the Company in the form of a foundation, public charity organization, temple, hospital, medical facility or an organization for social benefits with certificates, reliability, accountability and compliance with the procedures prescribed in Company regulations.

5. Use of the Company's funds or property to support projects must specify names only on behalf of the Company. Support funds paid out must have objectives for the Company's business, positive image and reputation. Withdrawals for payment must have clear objective specifications, accountable evidence and compliance with the procedures prescribed in Company regulations.

6. Should actions fit the scope of corruption with impacts directly and indirectly involving the Company, the aforementioned behaviors must not be neglected. Supervisors or responsible persons should be notified and cooperation should be extended in examining various facts.

## **Measures for Reporting Clues and Witness Protection**

The Company stipulates that executives at every level in the organization be responsible and give importance to ensuring acknowledgement, understanding and compliance with business ethics, policies/regulations of the Company, principles of good corporate governance and various laws in employees within the chain of command. The Company also specifies practice guidelines in considering and investigating complaints which are systematic, transparent and accountable.

To help complainants trust and believe in fair investigation procedures, equal and fair treatment of all stakeholders, the Company has arranged a channel for accepting notification of clues, complaints, opinions or recommendations indicating impacts or risk of impacts on stakeholders which will damage all stakeholders from business operations of the Company or practices of Company employees related to

violations of the law, rules, regulations or business ethics including behaviors indicative of corruption, unequal treatment or actions lacking in caution and thoroughness, whereby persons wishing to file complaints may notify clues or complaints and deliver details and evidence via the following channel:

Managing Director  
General Environmental Conservation Plc.  
447, Bond Street, Bangpood, Pak Kret, Nonthaburi, 11120  
Tel: 02-505-0900 ext. 666  
Fax: 02-502-0929

Employees or staff who have filed complaints, clues, statements or any information with honesty and no intention to accuse or cause damage to any persons or the Company will receive proper protection from the Company such as no changes in positions, job characteristics, workplace, breaks, threats, performance disturbance, employment termination or any other actions which are unfair to that person. If changes are necessary, changes must be approved by the Executive Committee.

Investigation procedures and reports must maintain the confidentiality of related information. Information is disclosed as necessary with consideration given to safety and damage to persons who have filed complaints, reported clues or the accused, including persons who have cooperated in investigations.

### **Investigation and Penalty Procedures**

1. Upon receiving notification of clues, an investigation committee will be appointed to investigate and filter information.
2. Should information or evidence be found to give the Company cause to believe the accused to have performed corrupt actions after investigations, the Company shall give the accused the right to acknowledge the accusations and prove their innocence by seeking additional information or evidence to prove non-involvement with corrupt actions.
3. If the accused is proven to have performed corrupt actions, the accused will be subject to disciplinary action in compliance with the regulations specified by the Company and/or related laws.
4. The investigation committee reports investigation results in writing to the Audit Committee, executives and the person who reported clues.