



ANTI-CORRUPTION POLICY

Principle and Rationale

Thai Beverage Public Company Limited and its subsidiaries (“ThaiBev”) operate the business in accordance with the principles of good corporate governance with fairness and adhere to the “Business Ethics of Thai Beverage Group” as well as uphold the best interests of stakeholders related to our businesses in Thailand and overseas. ThaiBev is well aware that corruption is one of the important and serious problems in Thailand causing damage to the country, the people, and ThaiBev in the long run. The problem has become more severe. ThaiBev is aware of the problem and, therefore, issues the anti-corruption policy (“Policy”) as a key instrument to prevent corruption and serves as a guideline for sustainable business in the future.

Scope of the Policy

The Policy applies to all ThaiBev’s directors (“**Directors**”), all ThaiBev’s executive officers (employees ranging from Assistant Vice President level up to the President and CEO) (“**Executives**”) and all employees (“**Employees**”). The Policy is designed as a guideline for Directors, Executives and Employees to know what to do, or whom to consult with, in case of doubt. Directors, Executives and Employees are responsible for maintaining the highest standards of business conduct. Any violation to the Policy shall be deemed as misfeasance and may be subject to serious disciplinary misconduct, contractual infringement and criminal offence, which may cause serious damage to the reputation and status of ThaiBev. Directors, Executives and Employees are required to familiarize themselves and comply with the Policy, including any future updates that may be issued from time to time by ThaiBev.

Definition

“Corruption”

- (1) Bribery means giving or agreeing to give any asset or benefit to government officials, government agencies, whether directly or indirectly, including political contribution, charitable contributions and sponsorships, to induce such persons to act, refrain from or delay their action in violation of their duty, in order to obtain or maintain unfair business interests, or to commit frauds, except for allowing by laws, regulations, announcements, regulations, customs and traditions to do so;
- (2) Dishonest act means dishonest acts of Directors, Executives and Employees by using or exploiting a position that has been assigned by ThaiBev in a wrong way

The objectives and practice guidelines of the Policy are as follows:

1. Directors, Executives and Employees are prohibited from acting and accepting any type of corruption, whether directly and indirectly, relating to businesses and functions in all countries in which ThaiBev operates its businesses.
2. Directors, Executives and Employees shall avoid any course of action that is linked to any corruption.
3. President and CEO is required to monitor and set up effective system for supporting anti-corruption actions, and to report to the Chairman of the Board of Directors and the Audit Committee.



4. President and CEO is required to review and present to the Board of Directors the revised Policy which is updated to be consistent with business changes, regulations, standards, and laws.
5. President and CEO and Executives are accountable for promoting, creating common understanding of and supporting relevant persons to comply with the Policy.
6. Directors, Executives and Employees shall be vigilant to any corruption related to ThaiBev. If a Director or Executive discovers any corruption, the Director or Executive is required to report such action to the Chairman of Audit Committee. If an Employee discovers any corruption, the Employee has an obligation to report such action to its supervisors or responsible persons immediately.
7. A person committing corruption is subject to a disciplinary action process. Once proven to satisfaction of the responsible committee, the person will be punished according to ThaiBev's rules regarding misconduct or violations strictly. If such act violates any applicable law, legal proceedings may be initiated against such person accordingly.
8. All supervisors at all levels shall ensure that Employees under their responsibilities have appropriate awareness of the Policy and shall monitor the actions in relation to the anti-corruption.

The Policy is to reinforce relevant guidelines and policies.