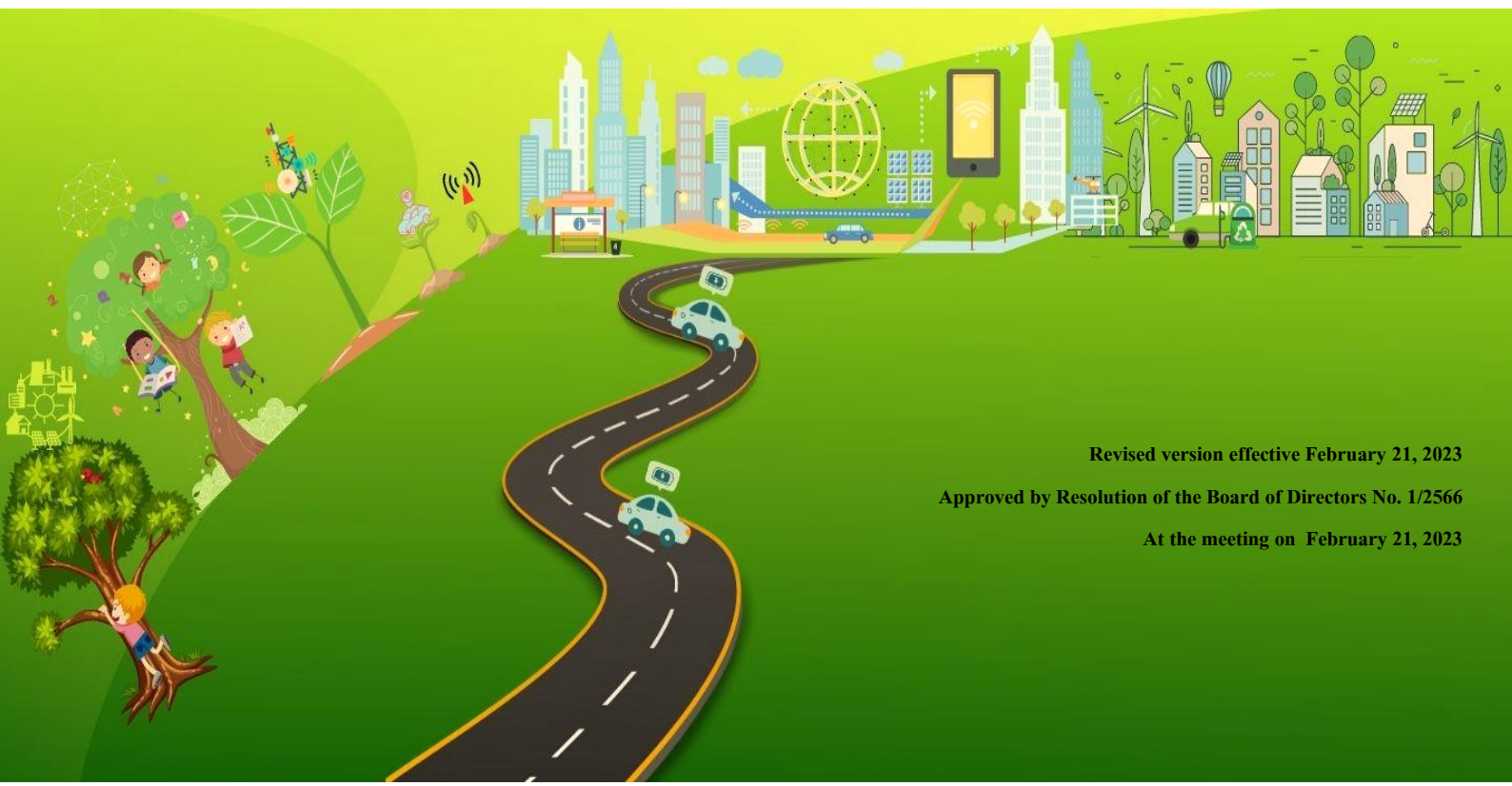




# Anti-Corruption Policy

ALT Telecom Public Company Limited and affiliated companies



Revised version effective February 21, 2023

Approved by Resolution of the Board of Directors No. 1/2566

At the meeting on February 21, 2023



## Anti-Corruption Policy

ALT Telecom Public Company Limited and affiliated companies

### Revision Status

Version	Effective Date	Revision Details
00	8/11/2561	New Documents
01	22/02/2562	Revise the whole document
02	21/02/2566	Revise the whole document format



## Anti-Corruption Policy

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## Anti-Corruption Policy

### ALT Telecom Public Company Limited and affiliated companies

#### 1. Principle

ALT Telecom Public Company Limited (the “Company”) campaigns for anti-corruption of the Company’s personnel, and subsidiaries because the board of directors has acknowledge the importance of anti-corruption campaign. As in the current Thai society, corruption problems have been increasing and more severe. Many people in the society share a perception that corruption is normal practice, even though, corruption is in fact, a problem that severely affects society. The problems caused by corruptions in organization are such as, inequality treatment which lessen the organization’s efficiency since the person in authority does not comply with the regulation, and cause a loss or over-expenditure to the organization, or an omission done by a government agent. Such corruptions cause not only negative effects to the Company’s performance but also the Company’s good reputation. As for the nation, corruption will destroy stability of businesses and trustworthy in investment, as well as the nation’s image.

#### 2. Scope

The board of directors of the Company has specified the anti-corruption policy and enforced the subsidiaries and associated companies including; Group Tech Solutions Co., Ltd, Information Highway Co., Ltd, I 21 Inter Corporation Co., Ltd, Innova Telecommunication Co., Ltd, International Gateway Co., Ltd, Energy Max Co., Ltd, to comply with the policy. Some parts of the policy have been primarily specified in the Company’s code of conduct. The anti-corruption policy is established to proclaim the Company’s determined intention to fight against every form of corruption, with an aim to encourage better understanding of the policy amongst its personnel, and subsidiaries. And to proclaim the Company’s determination against corruption to its stakeholders.

The origin of corruption is the lack of virtue and ethics. The Company, as a virtue organization, strives against all kinds of corruption and considers anti-corruption practices as a part of instilling and develop good virtue in people.



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#### 3. Definition

- Company Refer to ALT Telecom Public Company Limited and affiliate companies
- Affiliate Companies Refer to Company Limited that managed by ALT Telecom Public Company Limited with authorization or as a management team
  
- **Corruption** refer to the action that is intentionally perform to gain improper advantage not permitted by law for oneself or other persons. Corruption can be divided into 3 types as follows;
  - Asset misappropriation fraud  
An action taken to own the Company's assets in an improper way or causing the Company to loss assets, opportunity or any benefit, for the benefit of oneself and others (such as family members, relatives, friends etc.)
  - Corruption  
Use of one's given authority in an improper way for the improper benefit of the organization, themselves, or other persons. Corruption also includes offering and/or receiving bribery, conflict of interest, intimidation and/or solicitation, and slush fund.
  - Disclosure Fraud  
A change made to reports either financial reports including financial statements or financial records, or non-financial reports, to conceal embezzlement or misconduct for the benefit of themselves or others, resulted in the misrepresentation of the Company's financial statement, financial records, and other reports.

#### 4. Best Practices

##### 4.1 Declaration of Intent

Directors, executives, staff, and employees of the Company are prohibited from involving with any kind of corruptions either for the direct or indirect benefit of themselves, their families, friends, or acquaintances. The involvement in corruption includes receiving or offering bribery, either in monetary terms or not, to a government agency or other private agent which the Company has business transactions or contacts with. All personnel should strictly comply with the anti-corruption policy.



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#### 4.2 Responsibilities

1. The board of directors has a responsibility to consider and approve the anti-corruption policy, and encourage all personnel in the Company to understand and wholeheartedly acknowledge the threat occurring from corruptions. The audit committee shall be responsible for reporting any corruption or misconducting act occurring in and affecting the Company, while the board of directors shall provide advice and suggestion, as well as punishment for the corruption act and strive to find a solution for the problem with the Executive President and the Managing Director.
2. The audit committee has the following duties and responsibilities
  - Review the anti-corruption policy presented by the Executive President and the Managing Director, to improve the policy to be more appropriate for the environment and organization culture of the Company, and present it to the board of directors for approval.
  - Review and reconsider an amendment of the anti-corruption policy received from the Executive President and the Managing Director, and present it to the board of directors for approval.
  - Review internal control reports and risk assessment reports associated with organizational corruption which are presented by the internal audit, to ensure that the internal control scheme is suitable with the Company's business and can minimize the risks and threats of corruption which may affect the Company's financial status and performance.
  - Receiving a complaint relating to corruptions involving with the Company's staff. The audit committee shall investigate the issue as informed and reported to the board of directors to consider for a punishment and solution.
3. Internal Audit Department has duties and responsibilities as follows;
  - Conduct their duties as prescribed in the internal audit plan and report the result of internal audit and risk assessment regarding corruptions to the audit committee.
  - Perform any task assigned from the audit committee, in association with the investigation of organizational corruption which is not covered by the internal audit plan.
4. The Executive President and the Managing Director have the following duties and responsibilities;
  - Determine the anti-corruption policy and present it to the audit committee.
  - Communicate with the organization and related parties to acknowledge the anti-corruption policy.
  - Review the anti-corruption policy and improve the policy to cope with changes in business or regulation, and present to the audit committee.



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- Assist the audit committee during the investigation as informed by the whistleblower, or as assigned from the audit committee regarding the investigation. The board may assign other capable executives to investigate the issue.

#### 4.3 Anti-Corruption Practices

The board of directors, executives, staffs and employees of the Company must comply with the anti-corruption policy and the code of conduct strictly, and shall not involve with a corruption, directly or indirectly, by;

1. Prohibit to do any act of receiving or offering bribery to stakeholders relating to their duties, neither direct or in direct bribery, such as Sales & Marketing, Procurement, Investment Project, Contract, giving and receiving gifts, entertainment donation, or financial support, etc. to gain unethical benefit. The Company's personnel shall not;
  - Receive or offer any gift or souvenir in form of **cash, cheques, bonds, equity shares, gold, jewelry, properties, or other assets in the same quality**, to relating parties who they contact with, either government agent or private organization.
  - Receive gifts, complimentary or other benefits to persuade others to misconduct their duties. Prior to receiving a gift, staffs should make sure that they have complied with law and the Company's regulation. The gifts or complimentary received from works should be not overly high price and appropriate to an occasion.
  - Offer assets, objects, gifts, any complimentary or benefit to persuade others to make a decision or offer any privilege different from other trade partners. The value of occasional or seasonal gift offered must not exceed normal practice.
  - Become a mediator for the transfer of money, assets, objects or any benefit to a party related to the Company's business, government agent or any organization, in exchange for improper benefit or privilege, or causing government officer not to conform with rules, regulations or legal practices.
2. The procurement process must follow the Company's regulations and be transparent and accountable.
3. Expense for business reservations or other expenses relevant with business agreement can be done within reasonable budget and must be accountable.



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4. The Company's charities, must be complied with the following practices;
  - Any offering of the Company's money or assets for charity must be performed under the Company's name and must be offered to charity foundations, temples, hospitals or public benefit organizations which have a certification, are trustworthy and accountable. All charities must be proceed according to the Company's regulations.
  - Personal charity is allowed as long as it does not relevant with the Company, or cause any doubt or being suspicious for corruption.
5. Any charitable contribution must be practiced in accordance with the following procedures;
  - A charitable contribution of money or assets of the Company must be done only on behalf of the Company. The contribution must be offered with an objective to promote the Company's image and fame. Each charitable disbursement must be done with clear evidence in accordance with the Company's regulations.
6. Do not involve in any internal politics or use the Company's resource for such practice. The Company shall remain it's politically neutrality and shall support a practice complied with laws and democratic government. The Company shall not provide either direct or indirect support to any political party.
7. Directors and executives must aware of the importance of knowledge dissemination and advice to promote understanding of anti-corruption practice amongst their subordinate; to ensure that the Company's staffs are able to comply with the anti-corruption policy. The management as well should become a role model of honesty, ethic and virtue.

#### 5. Fraud Preventive

The Company has established and complied to appropriate internal control to reduce corruption risk, while raising employee awareness and value regarding anti-corruption, as a key prevention for organizational corruption.

#### 6. Corruption Activities Eligible for Reporting and Complaint

1. Any corruption activity which directly or indirectly related to the organization; such as; a bribery offered by the Company's personnel to a government agent, government office or private organization
2. Any activity violates the Company's regulations and practices, or affects to the Company's internal control which is suspicious to be a channel for corruption





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3. Any activity that causes a loss to benefit or fame of the Company
4. Any activity that violates the laws, moral or business ethics

#### 7. Whistleblowing Channel

The Board of Director has assigned the Audit Committee to consider reports and complaints of activities suspicious for corruption related to the Company; directly or indirectly, through the channel as specified in this policy.

The whistleblowers should report their complaint and indicate the details of their complaint altogether with their name, address and contact number, through the following channel;

- **By Mail**

Chairman of the audit committee/member of the audit committee/secretary of the audit committee

ALT Telecom Public Company Limited

52/1 Moo 5 Bangkruay -Sai Noi road, Bang Si thong sub-district, BangKruay district Nonthaburi

10160

Phone 02-863-8999

- **By Email**

auditcommittee@alt.co.th

Website Go to the menu “Contact” on the website <http://www.alt.co.th>

- **Company Contact**

Company’s Board of Directors Phone 02-863-8997

E-mail: directors@alt.co.th

For those who wish to report their complaint through the Company’s webpage, please report directly to the Audit Committee.

All stakeholders of the Company; including customers, competitors, creditors, government, community, as well as the Company’s executives and staffs, are eligible to report a clue or complaint for corruption. Regardless of the communication channel, the Company shall keep confidentiality of the whistleblower.



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#### 8. Security and Protection of Confidentiality

As to protect the right of the whistleblowers and information providers reported in good faith, the Company shall not disclose name, address or any information that might reveal the identity of the whistleblowers and the information providers. All information relating to the whistleblowers shall be considered as confidential. Only persons undertaking an investigation on the issue are allowed to access such information

In case of complaints, the Executive President, Managing Director and the Audit Committee shall protect the whistleblowers and individuals who provide information related to the investigation from any danger or harm caused by their cooperation in reporting, eyewitness, or information providing. The whistleblowers should directly report their complaints to the Audit Committee.

The Executive President, Managing Director and the Audit Committee have the authority to use their discretion in decision to protect the whistleblowers, eyewitness and information providers from harm and danger or unjustified act which caused from their cooperation in reporting, witnessing or information providing.

The Executive President, Managing Director and the Audit Committee can assign an executive to make a discrete decision on their behalf to protect the whistleblowers, eyewitnesses or information providers. The assigned person must not have any direct or indirect relation with the reported issue (For example, the accused person is a direct subordinate of the assigned person.).

Those who access to the information related to the complained issues must keep the details of the complaints, documents and evidences submitted by the whistleblowers in secret. The involved persons are prohibited to disclose the information to irrelevant individuals, except for legal compliance.

#### 9. Investigation Procedures and Penalty

1. Once received the complaint, the Executive President, Managing Director and the Audit Committee shall consider and investigate the issue.
2. During the investigation, the Executive President, Managing Director and the Audit Committee may assign their representative (the executive) to report a progress to the whistleblower. If the investigation found trustworthy evidence that the accused person has committed a misconduct act, the Company shall inform the accused person and allow the person to prove himself by providing additional information or evidences showing that the person is uninvolved in the dishonest act as accused.



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#### 10. Penalty and Remedial Measure

##### 10.1 Penalty

If the accused person has committed the dishonest act. If such act is deemed to violate the anti-corruption policy and the code of conduct of the Company, the person shall receive a disciplinary penalty according to the Company's regulations. In case that the dishonest act violates laws, the person may receive a legal punishment. A disciplinary penalty according to the Company's regulation and the judgment of the Executive President and Managing Director is final.

For any complaint, the Executive President, Managing Director and the Audit Committee have a responsibility to receive a report, acquire further information, conduct an investigation on the reported issue and report to the Board of Director to consider the issue and penalty as deemed appropriate.

##### 10.2 Remedial Measure

After the investigation has been completed, the executives shall consider remedial measures for the dishonest act such as, a revision or update on the Company policy, an improvement on the Company's internal control, a change in operation procedure, prosecutions, or extending the investigation in relevant departments. The executives may assign a relevant department to propose a plan or time frame to the Executive President or Managing Director. In addition, remedial measures should proceed consistently for every similar incident.

#### 11. Promulgation of Anti-Corruption Policy

To ensure all personnel of the Company acknowledge of the anti-corruption policy, the Company shall proceed the following actions;

- The anti-corruption policy shall be attached on the place easily accessed and read by staffs. Including Google Site
- The anti-corruption policy shall be published through the Company's communication channel such as e-mail, the Company's website, annual information disclosure report (56-1) and annual report (56-2)
- The Company shall as well arrange an anti-corruption orientation to newly recruited employees.



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### 12. Policy Reviewing and Revision

The Company shall consistently revise the anti-corruption policy annually or when there is a significant change affecting the policy.

The policy is effective on 21 February 2023 onward.

A handwritten signature in blue ink, appearing to read 'Mrs. Preeyaporn Tangpaosak', positioned above a horizontal dotted line.

(Mrs. Preeyaporn Tangpaosak)

President

ALT Telecom Public Company Limited