



IFS Capital (Thailand) Public Company Limited

Anti-Corruption Policy

1. Introduction

IFS Capital (Thailand) Public Company Limited (the "Company" or "IFS") is committed to conducting its business with integrity and transparency as well as compliance with good practices in corporate governance. The Company is opposed to all forms of corruption as unethical behavior erodes free and fair competition, and impedes the economic and social development.

The Anti-Corruption Policy (“this Policy”) adheres to the laws of Thailand, and is a supplement to the Company’s Code of Conduct and has been approved by the Board of Directors.

2. Purpose

- 2.1 IFS has a zero tolerance policy towards corruption.
- 2.2 This Policy is to provide guidance for the Company, its Directors Management and Staff as well as to any person acting on behalf of IFS (e.g., third parties) concerning compliance with anti-corruption laws and to set out monitoring and review procedures to ensure compliance with this Policy.

3. Definition

Corruption means any types of bribery such as offering, promising, giving, accepting or soliciting of an advantage as an inducement (e.g. money, gifts, loans, rewards, fees, entertainments or other advantages) for an action which is illegal or unethical, as well as the abuse of entrusted power by using a title, responsibility and/or information derived from work performed for the company to do anything to render benefit to one’s self and/or other parties in order to directly and indirectly acquire money, assets or any other benefits not appropriate for the business or any illegitimate interest for oneself and/or other parties including any action found conflicting with the Code of Conduct practice unless the laws, rules, announcements, regulations and local customs or business practices have allowed so.

4. Scope

All Directors, Management and Staff (collectively known as the “Employees”) of the Company are prohibited from operating or accepting every type of corruption both in direct or indirect manner for the employee’s benefit or that of the employee’s family, friends, associates or acquaintances covering every business and related department in every country.

The Company expects all agents and other intermediaries associated with, or acting on behalf of, IFS to comply with this Policy.



5. Roles and Responsibilities

- 5.1 The Board of Directors has duties and responsibilities to consider and approve this Policy as well as determine an effective system to support Anti-Corruption act in order to ensure that the Employees of the Company can be aware of and realize how significance of the problem of corruption may arise.
- 5.2 The Audit Committee has duties and responsibilities as follows:-
 - 5.2.1 To review the Company's financial and accounting reports, internal control system, internal audit function and risk management relating to the risk of frauds so that such operations of the Company are concise, appropriate, effective, and conformed to generally accepted accounting standard.
 - 5.2.2 To oversee the Anti-Corruption Policy and its program to ensure compliance with legal and ethical obligations.
- 5.3 CEO and the Management are responsible for determining Anti-Corruption system, promoting, and encouraging Anti-Corruption manner conveyed to all their staff and related parties. This also includes reconsideration on system or regulation in order to best adjust with business changes, regulations, standards, and laws.
- 5.4 Internal Auditors are responsible for auditing, assessment, and evaluations in business transactions whether they are accurate and complied with guidelines, approving authority, standards, laws, and policies in such monitored department in order to assure that the internal controls are sufficient and suitable for probable risk in corruption.
- 5.5 The Employees must uphold this Policy when performing their duties. Anyone who discovers or suspects violations of this Policy must report them to a supervisor or through one of the channels established under the "Whistleblower Procedures" of the Company. (Please refer to the "Whistleblower Procedures" of IFS separately).

6. Guidelines

6.1 General

- 6.1.1 IFS will support and encourage its personnel at all levels to realize the importance of countering corruption and raise their awareness in this respect. In addition, IFS has implemented effective internal controls to prevent all forms of corruption and bribery.
- 6.1.2 The Anti-Corruption Guidance covers Human Resources procedures, from the recruitment and selection process to the promotion, training, performance appraisal and compensation offered to Staff Members. Supervisors at all levels have a duty to communicate with their subordinates to make them understand and adopt these guidelines in all business activities under their responsibility. The supervisors also have to control and ensure their operational efficiency in compliance with these guidelines.
- 6.1.3 Directors and Management have the responsibility to implement the Anti-Corruption programme as well as the commitment to the Anti-Corruption Policy.



- 6.1.4 Directors, Management and Staff of IFS must follow the Anti-Corruption Policy and the Company's Code of Conduct by avoiding and involving with any course of corruption either in direct or indirect manner.
- 6.1.5 The Employees of IFS at all levels shall not be negligent in any corruption conditions involved directly with the Company. All Management and Staff must notify such act to supervisors or responsible person, including collaborating with investigation. Any queries or questions need to be consulted with the supervisor or a responsible person who monitors the Compliance of Company's Code of Conduct provided in particular channels.
- 6.1.6 IFS shall provide fairness and safeguard staff who denies or informs corruption cases relating to IFS by applying Protection Policy for appellant or persons who cooperate with Anti-Corruption information as stated in the Company's Whistleblower Procedures.
- 6.1.7 A person who commits the corruption is equivalent to violating the employee regulations in regard to personnel management. This means such person needs to receive disciplinary punishment as well as legal punishment if such offence is also against the law.
- 6.1.8 IFS will stress the importance of dissemination, knowledge sharing, and communications with other people who are involved or will affect IFS so that all these parties shall conform effectively to the Anti-Corruption guidelines.
- 6.1.9 IFS will undergo constant reviews of these guidance and operation measures to ensure their compliance with changes in laws as well as changing situations of our business operations.
- 6.1.10 To stress the attention on processes which incur a high risk in corruption, the Employees of IFS must conform carefully to the course of action as stated below in Clause 6.3 – Clause 6.6.

6.2 Measures to Anti-Corruption

- 6.2.1 **Goods Control Environment:** IFS focuses on the importance of the procedures of corporate governance by covering the roles and responsibilities in preventing and countering corruption, establishing ethical principles and code of conducts to guide the Employees to perform their duties with honesty, and providing a channel to file complaints about the corruption appropriately with a safeguard for the identity of the whistleblower.
- 6.2.2 **Risk Assessment:** The Management of IFS will conduct CSA (Control Self-Assessment) on the risk of corruption and fraud on a regular basis and review the existing mitigation measures to ensure they are appropriate.

6.2.3 **Training and Communication:**

The Employees

The Anti-Corruption Policy will be circulated to all the Employees of the Company for acknowledgement and the training will be organized for all Directors, Management and Staff of IFS to raise awareness of this Policy. This Policy, including all additions and amendments, will be posted on the Company's website.



Agents, Intermediaries, Suppliers, Clients and Others

The Anti-Corruption Policy will be communicated to all Agents, Intermediaries, Suppliers, Clients and Others, who deal with IFS, at the outset of every business relationship with the Company and as appropriate thereafter. The Company encourages every person it deals with to adhere to similar standards of corporate responsibility.

- 6.2.4 **Control activities:** IFS will focus on the importance of the procedures of internal controls and compliance with the rules, regulations and orders of the Company, to manage the risks of corruption by evaluating the effectiveness and the adequacy of the existing internal controls and making revision to the rules, regulations and orders of the company to be able to counter the corruption in time.
- 6.2.5 **Monitoring and Review:** The Human Resources and Administration Department of IFS shall review this Policy and submit any proposed amendments to the Audit Committee and the Board of Directors for approval. The HR Head will also monitor the implementation of this Policy and make recommendations accordingly. Any improvements, including a possible revision of such policy in accordance with business changes, regulations, standards and laws, will be made as soon as possible.

6.3 Political Contributions

Political Contributions refer to financial support or donation of items and/or participation in activities; or the Company's support for Employees to attend political events in its name in order to acquire business advantages. This however does not include Employees' own participation on the basis of his/her personal rights and freedom, but they must not claim the status of being an employee of IFS or use any of IFS' property or equipment for the purpose of political activities.

IFS' policy is to conduct business on a neutral basis with neither political alignment nor attachment to any professional politician of any party. IFS does not make any donations as a company to political parties, politicians or candidates for a political office as defined in paragraph one for benefit of the Company's business.

6.4 Charitable Contribution, Donations and Aid Grants

Charitable Contribution, Donations and Aid Grants can be a risk in corruption to the Company when the activity refers to a payment but without constructive returns. Besides, the activity can become a claim or a means of corruption. To avoid any Charitable Contribution, Donations and Aid Grants with a hidden agenda, IFS formulates a policy, criteria, review process and control details as follows:-

- 6.4.1 A Charity or Donation or Aid Grants activity has to be proven that it actually exists; that actions have been made to successfully realize the purpose of the project and that it is set up for the real benefit of the society or for the Corporate Social Responsibility (CSR) purpose.



- 6.4.2 A Charity or Donation or Aid Grants has to be proven that it has nothing to do with a reciprocal return with anyone or any organization except an action to honor the donor as normally practiced such as displaying our logo, mentioning IFS name at the event or in a public relation media.

6.5 Sponsorships

Sponsorships differ from Charitable Contribution, Donations and Aid Grants as they provide a channel for the Company to promote its business, logo or goodwill may, too, contain a risk as money usually paid for business or benefit is difficult to detect and measure. In addition, the Sponsorships could be related to bribing. IFS formulates a policy, criteria, review process and control details as follows:-

- 6.5.1 A project has to be proven that the person soliciting for sponsorship has actually run the project; that his action is to realize the project's purpose; and that the project is created for the real benefit of the society or for the CSR purpose.
- 6.5.2 It has to be proven that sponsorship or any other profit computable in a monetary value such as gift of accommodation and food has nothing to do with a reciprocal return with anyone or any organization unless it is an announcement to honor the person as normally practiced in the business.
- 6.5.3 Before making any sponsorships, a requisition form naming the recipient(s) and describing the purpose of the sponsorship, along with all other supporting documents, must be submitted to the Company's authorized persons for approval in accordance with the Company's Approval Authority.

6.6 Gifts, Hospitality and Others

IFS recognizes that fostering good relationships with business partners is important to its continued success. The giving and receiving of gifts and/or hospitality and/or expenses relating to others to or from third parties is not prohibited if the following requirements are met:

- 6.6.1 It is not made with the intention of influencing, inducing or rewarding a third party in order to gain any advantage through improper performance, or in explicit or implicit exchange for favors or benefits;
- 6.6.2 It complies with all relevant laws;
- 6.6.3 It is given in the Company's name, not the Employee's name;
- 6.6.4 It does not include cash or a cash equivalent (such as gift certificates or gift vouchers);
- 6.6.5 It is appropriate in the circumstances. For example, it is customary for small gifts to be given at Thai New Year (Songkran), Chinese New Year and International New Year;
- 6.6.6 It is an appropriate type and value, and given at an appropriate time. For example, if the Company is engaged in a tendering process, the Employees must not accept gifts and/or hospitality from any participating company;
- 6.6.7 It is given openly, not secretly.

The Employees are permitted to receive gifts with a monetary value of not more than Baht 5,000. All gifts received by employees must be declared to the respective Head of Dept. using the Gift Declaration Form, and handed over the gift to the CEO's Secretary. The CEO will approve / decide on gifts for lucky draw or for staff to keep as appropriate.



7. Human Resources

This Policy will be adopted by the Human Resources and Administration Department of IFS and apply to all aspects of personnel management, i.e. recruitment, training, performance evaluation, remuneration and promotion.

8. Disciplinary Action

Disciplinary action shall be in line with the Employee's Disciplinary Action Regulations issued by the Company and/or relevant laws.

Directors, Management and Staff must understand and follow this policy in order to achieve the Company's goal and objectives which effective since 18th February 2021 onwards.

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(Mr. Randy Sim Cheng Leong)
Chairman of the Board