

Announcement of Airports of Thailand Public Company Limited on Anti-Corruption Policies

Airports of Thailand Public Company Limited (AOT) is strictly committed to preventing and eliminating corruptions and illegal practices to ensure greater organizational value and image of the AOT while recognizing the importance of promoting the organization's good corporate governance and organizational excellence in accordance with international standards aiming to build greater trust and confidence for all shareholders, investors, and stakeholders involved in the AOT's business operations. The AOT has stated its declaration of intention in the "Private Sector Collective Action Coalition against Corruption (CAC)" to proclaim its determined intention to fight against illegal conducts of all types in both direct and indirect manners. The organization has encouraged its committee members, executives and employees to realize the significance of these anti-corruption policies and to put them into practice effectively.

Definitions and Meanings

- "Corruption" means all forms of bribery which can lead to the abuse of power by offering, promising, giving, accepting or requesting money, assets or any other benefits which are considered inappropriate for the government or private officers or responsible persons, whether directly or indirectly, to make those persons act or refrain from performing duties to obtain or maintain any inappropriate businesses or benefits, unless it is deemed to have pursued the trading laws, rules, regulations, or traditions of a certain community.
- "Charitable Contribution" means the donation of money or other necessities or any benefits offered to external organizations.
- "Sponsorship" means the financial support for the purpose of branding business or reputation of the sponsorship's owner.
- **"Expenses of Gift, Hospitality and others"** means the expenses with financial value paid for obtaining a thing, which shall include any form of offer used to substitute cash or exchange for product or service.
- "AOT Personnel" means the Board of Directors, president, executives, employees and staff members belonging to the AOT.

Duties and Responsibilities

1. AOT Board of Directors

- Determine and monitor policies to prevent and eliminate all forms of corruption and bribery, ensuring that the management team always recognizes and values the significance of the anti-corruption to be fostered as an organizational value.
- Pursue all anti-corruption and bribery policies and apply serious forms of penalty for violations.

2. Audit Committee

- Oversee and examine the appropriateness and adequacy of policies and practice guidelines on anti-corruption.
- Oversee the internal control, preparation of financial reports and other processes related to anti- corruption measures, and compliance with the anti-corruption policies.
- Review and ensure that financial and accounting reporting systems, internal control systems, internal audit systems, and risk management system are in compliance with international standards, concise, appropriate, up-to-date and efficient.
- Review risk assessment and give advice to the AOT Board of Directors regarding necessary actions required for risk mitigation which shall be further implemented by the executives.
- Regularly report the internal audit results of AOT's anti-corruption measures to the AOT Board of Directors and give recommendations and instructions to the AOT Board of Directors and executives.

3. Good Corporate Governance Committee

- Determine monitoring guidelines and implementations towards anti-corruption of AOT
- Determine and review anti-corruption policies

4. Risk Management Committee

 Monitor and support the implementation of risk management towards anti-corruption by sufficiently and appropriately developing effective risk assessment and reviewing anticorruption measures.

5. President and Executives of AOT

- Seriously and consistently monitor and encourage all employees and staff members of AOT to conduct in compliance with anti-corruption policies.
- Determine effective risk assessment on anti-corruption for the implementation processes that may lead to corruption.
- Foster the encouragement and support for anti-corruption policies and communicate the said policies to AOT employees and stakeholders.
- Review the appropriateness of developed measures and procedures to comply with changes of business, rules, regulations, and legal provisions.

Practice Guidelines

All of AOT personnel must perform in compliance with the following practice guidelines.

- 1. Strictly pursue the anti-corruption policies and never get involved in all types of corruption, either directly or indirectly.
- 2. It is strictly prohibited for AOT personnel to call for, perform or agree to any type of corruption, directly or indirectly, in order to seek personal benefits in an illegal manner.
- 3. Any of the AOT's charitable contribution or sponsorship shall be practiced with reliable evidence or reference in accordance with the AOT's rules and regulations, where the receiver of the charitable contribution or sponsorship shall be required to report the performance outcome to be met with the request's objective.
- 4. The acceptance and offer of gifts, properties, or any benefits, which shall include all types of hospitality expenses and other related expenses, shall be practiced for business or traditional purposes only. Each acceptance and offer shall not exceed 3,000 Baht (Three Thousand Baht Only). In addition, it is strictly prohibited for all AOT personnel to accept any gift, property, or any benefit specified in the first paragraph if such acceptance shall be deemed to be the cause of any certain impact on the duty-based determination or operations of the company.
- The AOT has provided regular audit processes of systems and procedures for distributing and marketing sections, including supply procurement and contract signing tasks. It is also included risk assessment towards corruption and its appropriate solutions.
- 6. The AOT has strategically provided effective methods in human resources management and development covering the recruitment, promotion, training programs, evaluation, and offers of remuneration for outstanding performance reflecting the strong intention upon the anti-corruption policies.
- 7. The AOT shall not demote any position, apply harsh penalty, or provide negative feedback to its employees who refuse to perform any corrupted practices, even though they affect the AOT's business opportunity. Additionally, the effective communication process has been applied for clear perception on anti-corruption policies.
- 8. The AOT has arranged an orientation course for new employees, which includes the consecutive development of communication and training programs so as to provide AOT personnel with substantial understanding towards anti-corruption policies and its penalties in case of policies' abstention.
- 9. The AOT has advanced its data storage procedures, particularly for financial documents for prompt audit based on accuracy and appropriateness of financial report and provided effective process to ensure that all data are kept on record and no transaction remains unexplainable or untruthful.
- 10. The AOT has developed effective internal audit for the control of financial procedures and data storage which reflect the effectiveness of its anti-corruption policies, while ensuring greater confidence in the inspection of its financial documents and information.
- 11. The AOT has fostered efficient communication strategies of the anti-corruption policies for its affiliates, subsidiaries, agents, stakeholders, third parties, and public representatives to make use of the anti-corruption policies effectively and practically.

- 12. The AOT has arranged effective communication channels for the filing of clues and the determination of penalties for any AOT personnel who appears to be involved in any corrupted action. The AOT shall proceed with effective investigation and strictly apply appropriate penalty in accordance with the AOT's required rules, regulations and laws.
- 13. The AOT shall always provide fairness and protection for its personnel and other third parties who have clues or evidence of any corrupted action while ensuring that they can confidently access a certain communication channel and information, particularly when they require suggestions on the anti-corruption policies.
- 14. The AOT President shall be responsible for reporting of performances related to the anti-corruption policies to be acknowledged by the Audit Committee, Good Corporate Governance Committee and AOT Board of Directors at least once a year.
- 15. In case where suspicious evidence of corruption of AOT personnel is found, the matter must be immediately reported by the Office of Audit to the Audit Committee and AOT President in order to be further reported to AOT Board of Directors.
- 16. The AOT has strategically developed review processes on the anti-corruption policies and its guidelines on a yearly basis to comply with the changes of business situation, rules, regulations, principles and enactment of laws.

Penalties

Any direct or indirect action deemed as a violation against this anti-corruption policies shall be considered by disciplinary regulations of AOT and by legal practices in case of being legal infraction.

Announced as of 16 June 2016

(Mr.Prasong Poontaneat)
Chairman of AOT Board of Directors

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