

[Translation]

**Anti-Bribery and Anti-Corruption Policy**  
**Thai Life Insurance Public Company Limited**

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**1. Overview**

Thai Life Insurance Public Company Limited (“**the Company**”) focuses on the importance to conduct business with honesty, integrity, transparency and under the Good Corporate Governance Policy. The Company has the intention of anti-bribery and anti-corruption, giving a full support to the Board of Directors, executives, and employees to enhance awareness of anti-bribery and anti-corruption in all forms because the Company recognizes the potential impact of bribery and corruption to the Company in terms of reputation, property, and business sector that would lead to an unfair competition, as well as an impact on the economy and society of the country as a whole.

**2. Objective**

- 2.1 To demonstrate the Company's intention in anti-bribery and anti-corruption in all forms.
- 2.2 To be a guideline for the practice of the Board of Directors, executives, and employees of the Company not to violate the provisions of the Prevention and Suppression of Corruption Act, including laws, regulations, and the Company’s ethics relating to anti-corruption.
- 2.3 Encourage the Board of Directors, executives, and employees to recognize the importance of anti-bribery and anti-corruption to help each other to monitor and report clues when encounter with any form of bribery incidents.
- 2.4 To be a guideline for the Board of Directors, executives, and employees of the Company to understand and to strictly comply to conduct business appropriately, including to prevent risks that corruption actions might incur while conducting business.

**3. Scope of policy.**

This policy applies to all Board of Directors, executives, and employees of the Company.

**4. Definition.**

- 4.1 “Board of Directors”      Means      Board of Directors of the Company.
- 4.2 “Management”            Means      The director and Chief Executive Officer\*, and the first four executive level positions which counting downwards and those who hold positions equivalent to those of the fourth executive level positions and shall include the persons who holding the highest management level positions of accounting or finance section at the level of department director or higher or equivalent.

[Translation]

4.3 “Staff”	Means	Company’s employees at all levels whether they are regular employees, temporary staff, worker or contract employees.
4.4 “Bribery”	Means	To grant, to promise, offers to grant, any property or other benefits, both directly and indirectly, to any state official, government agency, private organization, or others with intent to persuade such person to not perform, both in whole or in part, or wrongfully perform to keep benefits that is unsuitable for business, illegal, unethical, or may negatively affect the Company’s image
4.5 “Corruption”	Means	To either perform or not perform responsibility in position or duty, or to either perform or not perform in circumstances that may mislead others to believe that one person has position or duty, or exercise power in the position or duty, or use resources to convict a fraud, money laundering, embezzlement, falsification, and obstruction of justice to obtain unlawful benefits for oneself or others.

## 5. Role and responsibility

### 5.1 Audit Group

Audit group has a duty to assess the internal control of each process which shall cover the bribery and corruption risks, review and ensure that the operation is in accordance with policies, practices, execution authorities, regulations, and laws. When detecting irregularities from normal business practices, such events must be considered whether they are caused by bribery or corruption.

### 5.2 Risk Management Group

Risk Management Office has a duty to evaluate and review policies, guidelines, and scope of risk management which shall cover bribery and corruption, to arrange for bribery risk assessment, including the result of bribery and corruption risk management to the Risk Management Committee and the Board of Directors.

### 5.3 Compliance Department

Compliance Department has a duty to assess the adequacy and suitability of the Anti-Bribery and Anti-Corruption Policy in order to comply with relevant laws. In addition, to give advice and recommendations on compliance with the policy including to coordinate with relevant departments to provide training, disseminate, and give knowledge on anti-bribery and anti-corruption.

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#### **5.4 Human Resource Group**

Human Resource Group has a duty to build an understanding of how to use guidelines and to cultivate conscience to the Board of Directors, executives, and employees on ethics about bribery and corruption risk management, including to ensure that there is human resource management and training to enhance knowledge and competency for the Board of Directors, executives, and employees in order to have sufficient potential for anti-bribery and anti-corruption protection.

#### **5.5 Board of Directors**

The Board of Directors has a duty to determine the direction, policy, and the Company's strategy, including to ensure a proper, cautious and efficient internal control policy and mechanism in order to protect the Company from bribery and corruption.

#### **5.6 Management**

Management has a duty to behave in accordance with the policy, as well as to govern, to communicate, and to give advice to their employees in order to know and understand to be able to behave suitably according to the policy.

#### **5.7 Staff**

Staff has responsible for studying and understanding the policy and strictly put into practice.

### **6. Guidelines in compliance with the policy.**

- 6.1 The Board of Directors, executives, and all employees must comply with this policy which includes any related regulations, orders, or requirements of the Company by prohibiting involvement in bribery and corruption either directly or indirectly in order to obtain illegal benefits regardless of whether the benefits will fall to the Company or others.
- 6.2 The Board of Directors, executives, and all employees must not neglect or ignore when encounter events that could be bribery or corruption. The witness has a duty to report or report a clue in accordance with the procedures and channels which are determined in the Whistle Blowing Policy and cooperate in investigating various facts. If any question incurs, the witness shall consult with supervisor or the designated person who is responsible for the oversight of the Company's policy compliance.
- 6.3 The Company shall provide a fair treatment and protection to any personnel that rejects bribery or corruption or inform any of the Company's activities related to bribery and corruption by using measures to protect whistleblower in accordance with the Company policy and guideline regarding the Whistle Blowing Policy.
- 6.4 The Company shall have a human resource management that reflects the Company's intention to prevent bribery and corruption by focusing on personnel selection process, training process as well as evaluation process.
- 6.5 The Company has established an appropriate and efficient internal audit process to prevent bribery and corruption.

[Translation]

6.6 The Company focuses on the importance for providing an accurate and transparent of accounting system including an audit mechanism to control the financial reports as efficiently and accordingly with the internal control measures to prevent bribery and corruption in the organization.

6.7 To prevent any bribery and corruption risks, the Board of Directors, executives, and staff at all levels must perform their duties with carefulness as especially in the following activities:

**6.7.1 Political Contributions.**

The Company operates with political neutrality and gives importance to political rights and freedoms. Therefore, employees can participate in political activities under the determined framework of law, but must not take the role as staff of the Company or take any action which will make an understanding that is done by the Company including not to provide any political contributions in a manner that is against the law and the Company's policy.

**6.7.2 Donation and Sponsorships.**

Charitable donations in the form of financial, property or any other forms that have the objective for helping the overall society, institution, organization, or individual without the intention of seeking benefits and the use of money or property to support any activity or project with the purpose of public relations or promoting the image and business of the Company such as promoting activities for society, environment, or sports can be done, but must operate under the legal framework and relevant Company's policy including examine, approval, and review, there must be documentary evidence and according to Company's internal process and be transparent in order to ensure that donations of charity and financial support will not be used as a tool for bribery and corruption.

**6.7.3 Hospitality Expenditures and Gift.**

Hospitality Expenditures and gifts are in the cost of conducting the Company activities in order to build good relationships or express social etiquette on various occasions. In this manner, the Company recognizes that there may be a risk that will be used as a tool for bribery and corruption. Therefore, giving or receiving an expenditure or gift can be done as appropriately with the situations or various traditions as well as the value is not higher than normal, not contrary to morality or lead to business commitment or have a bribery and corruption risks, and must be done according to the Company's policy.

**6.7.4 Procurement.**

The procurement of the Company must have process controlling that the operation is done with transparent process and not contrary to the legal provisions and the Company's policy which must be conducted through the unit responsible for direct procurement including having to go through the process of selecting and inspecting partners and proceed according to the procedures or regulations which are determined by the Company.

[Translation]

**7. Reviewing and adjustment of the policy.**

If there is an adjustment in law, regulation, policy, or other practices that affects this policy or any belief that this policy is inappropriate or inadequate to conduct business, the revised and amended policy shall be proposed by Compliance Department to the Board of Directors to ensure that the policy remains comprehensive, effective and can be applied appropriately.

**8. Penalty.**

If any person who violates, disobey, or neglects this policy, including relevant guidelines, rules, and regulations intentionally or unintentionally, the Company assumes that the person commits a breach of discipline and must be considered to have a disciplinary action according to the Company regulations on human resources management. In case that such violation and disobedience of this policy also violates the law, a person who violates must be proceeded according to the law.

(The policy shall be effective as of 1 October 2021 onwards.)

\* Change the position name according to the Company's organizational structure by the resolution of the Board of Directors Meeting No. 1/2022 held on January 14, 2022.