
Anti-Bribery and Anti-Corruption Program

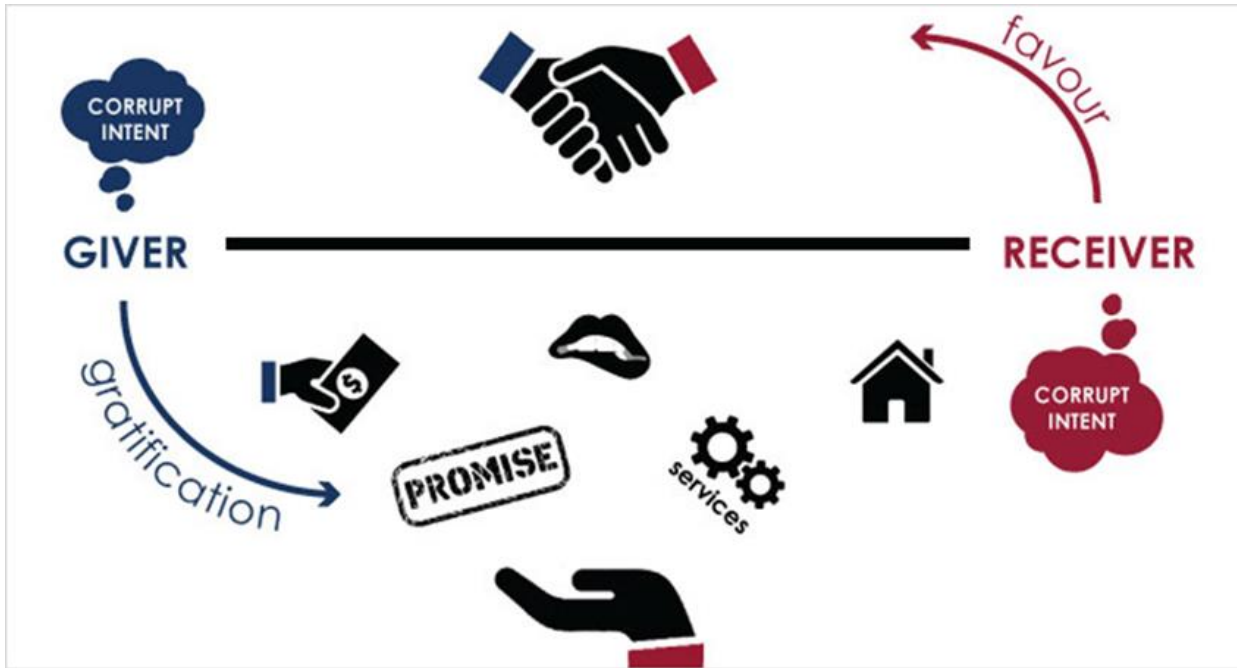


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1. Definition

Definition



What is bribery?

*The **offering, promising, giving, accepting or soliciting of an advantage** as an inducement for an action which is illegal, unethical or a breach of trust*

What is corruption?

*The **abuse of entrusted power for private gain through misconduct of the company's rules and regulation**, which covers any action, whether offering, promising, soliciting, demanding, giving or accepting bribes*

2. Gifts, Hospitality/Entertainment Policy

Gift, Hospitality, Entertainment Policy



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- ✓ The exchange of business courtesies is a common practice is various legitimate reasons, to create goodwill, establish trust in relationships, or improve the image of The Company
- ✓ Giving openly, not secretly
- ✓ Given in the name of the appropriate Company, not in a worker's name
- ✓ Prior approval from an authorized person must be obtained before providing business partners
- ✓ Reimbursed properly and supported by the evidences as defined by the Authority Matrix and the related policy
- ✓ Staff must inform their direct supervisor via email within 3 business day **if the gifts value exceeds 3,000 Baht**



- **All employees should not accept Gifts, Hospitalities, and Entertainments which the values are excessive or out of line with business norms or tradition**

3. Charitable Contributions & Sponsorships Policy

Charity Contribution & Sponsorships Policy

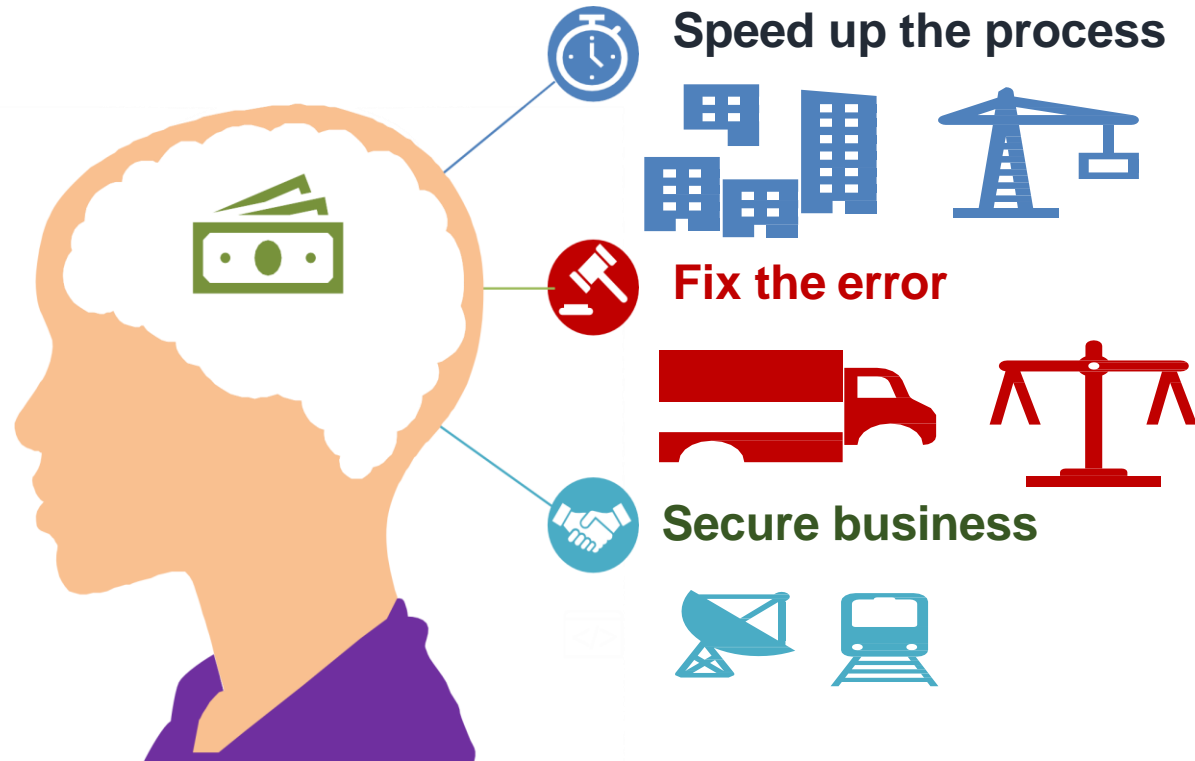
- ✔ Charitable Contributions should be transparent, disclosed as per requirement
- ✔ Sponsorships: Payments made for business objectives and usually for brand or reputation management purposes
- ✔ Must be legal and ethical under local laws and practices
- ✔ Must be prior approval



- Donations, contributions to political parties
- Offer or made, within any business context, business advantage

4. Facilitating payments & Kickbacks

Facilitating payments & Kickbacks



Facilitating Payments

- unofficial payments made to secure or expedite a routine or necessary action (usually by a government official)



Kickbacks:

- Payments made in return for a business favour or advantage



Note

- All Workers **must avoid** any activity that might lead to, or suggest a facilitation payment or kickbacks

5. Code of Conduct

Code of Conduct Policy

- ✓ General Code of Conduct and ethics
- ✓ Confidentiality and official information
- ✓ Standards of Propriety
- ✓ Integrity
- ✓ Relations with the public
- ✓ Media Protocols
- ✓ Use of company resources
- ✓ Specific Duties
- ✓ General Behavior
- ✓ Fraud

Code of Conduct

The latest revision is on

Mar 15, 2011



(TH) Code of
Conduct



(EN) Code of
Conduct

- An employee's personal activities shall not conflict or appear to conflict with his/her duties to the Company: Avoid Personal Transaction in which their personal interest conflict or appear to conflict with those of the Company
- Protect the property, right, interests
- Responsibilities, confidential information, and reputation of the Company



Do's



Don'ts

- Employees are not permitted to use the Company's resources or information for their personal benefit
- Employee have not a direct or indirect financial or business interest in business of any supplier, competitor, customer
- Any employee theft of the Company's property
- Disclosure the Company's confidential Information

6. Anti-Corruption Program



**Private Sector
Collective Action against Corruption**

1024 Companies have joined

455 Companies have been Certified

Join us Today! [Declare](#)

Do Good . Do Right . Fight Corruption



- On 7th Feb 2020, CAC Council hereby certifies that RAIMON LAND PLC. has met the commitment to the CAC declaration on anti-corruption by putting in place good business principles and control against bribery

Anti-Corruption Policy



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Whistleblowing



We have the **Anti-Corruption Policy**

WHAT IS CORRUPTION?

**CORRUPTION IS THE ABUSE OF
ENTRUSTED POWER FOR PRIVATE GAIN.**

<http://www.transparency.org>

We Prohibit

1. Offering bribery to a government official, foreign state official
2. Giving or accepting bribery in any course of business
3. Giving or accepting gifts or cash which is incompatible with tradition

Whistleblowing Channels

Whistle blowing could be sent to email:

whistleblowing@raimonland.com

WE PROMISE 😊

- We shall keep the identity of the whistleblower confidential and shall provide comprehensive protection and justification to the whistleblower.
- We shall disclose information only as needed with the concern of whistleblower's safety against discrimination or retaliation.
- We shall not demote, punish, or haze the employee who refuse corruption or make whistle-blowing even if the whistle-blowing may deprive our business opportunity.

PUNISHMENT

- The person who gets involved with the corruption must have taken disciplinary action according to the company's regulation.
- For the case that breaching or denying the Anti-Corruption Policy is also breaking the applicable laws, the case is subject to prosecution.

7. Case Study

Case Study No.1: Special Gift

We are about to issue a tender

I have become somewhat friendly with one of the salespeople of one of potential bidder

She called today to **invite my family to use her beach house**, which she said **we could use for a full week**
We have had an account with her company for about 15 years and **I don't anticipate her taking this bid**

Am I able to accept her offer?



Case Study No.1: Special Gift



Not able to accept the offer because

1. Her offer is for your personal activity: Given and/or received in the name of the appropriate Company, **not in a worker's name**
2. The offer is lavish: all employees must not solicit and/or receive from vendors or business partners for money or "Anything of Value"
3. Inappropriate of timing especially in during tender process



Case Study No.2: Accurate Record

I had a dinner with our clients last night, **but the cost is much higher than I expected**

I would like to submit an **internal disbursement slip with more than the actual number of attendees to reduce the “per person” cost**

I understand that it is acceptable because **the total amount of the reimbursement is unchanged**

Is my understanding correct?



Case Study No.2: Accurate Record

Your understanding is incorrect!



- In accordance to the Code of Conduct, Gifts, Hospitality/Entertainment Policy Gift, Donation, Sponsorship, Hospitality, and Entertainment, **must be approved by Authority Person and reimbursed properly and supported by the evidences as defined by the Authority Matrix and the related policy**
- Expenses for permitted Gift and Entertainment **shall be accurately and specifically designated as such in the disbursement record and recorded in the Company's accounting**



Case Study No.3: Inside Information

I am a Manager in charge of Strategy & Business Development of our Company

This week, I will participate in a meeting of an Association of Real Estate Industry and **we are requested to submit a report describing our annual plan, project feasibilities and targeted market. Same requests are sent to other participants**

Can I submit such information?



Case Study No.3: Inside Information

Not able to submit!



Because of the these are inside information

In accordance to the Code of Conduct. You shall not use any assets or resources of the Company or any confidential or inside information for personal or financial gain of the employee or any other person or entity other than the Company

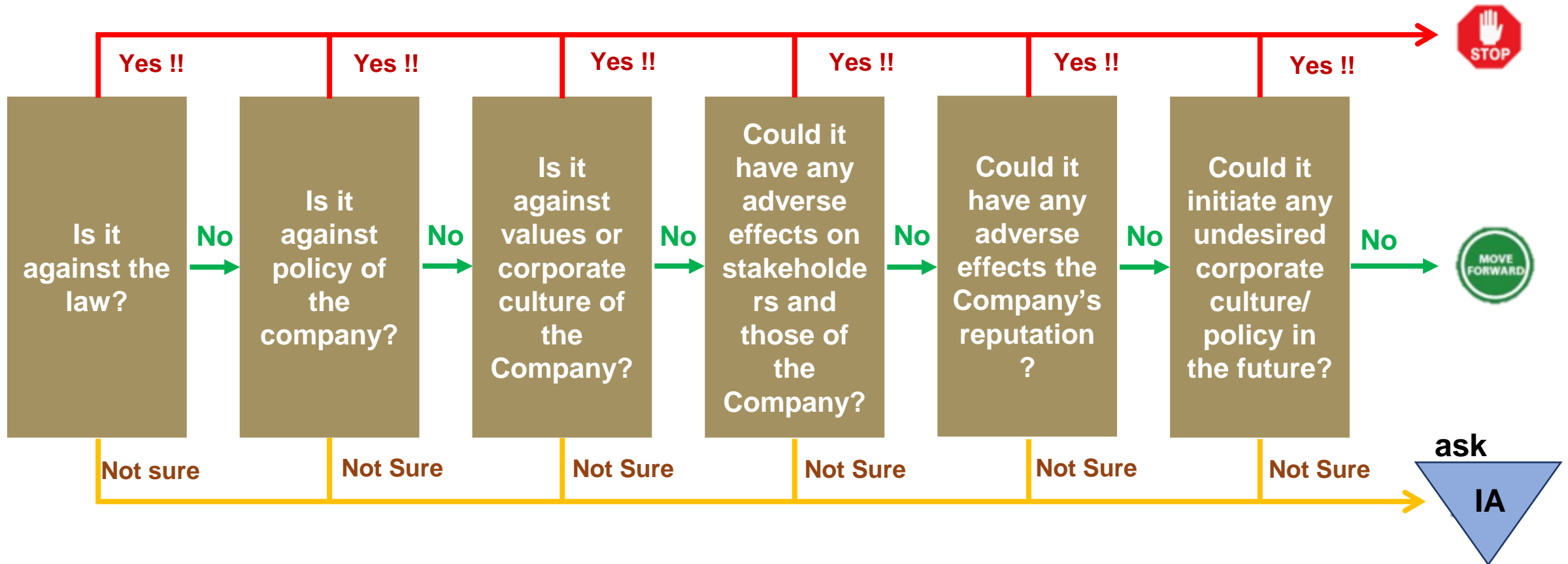


8. Key Takeaway

Key Takeaway



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THANK YOU
