AOT

Announcement of Airports of Thailand Public Company Limited

Anti-Corruption Policy

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. The organization has encouraged its committee members, executives, and employees to realize the significance of these anti-corruption and bribery policies and to put them into practice effectively.

Definitions and Meanings

"Corruption" means all forms of dishonest, unethical, or illegal conduct, including bribery and embezzlement, influenced by a person entrusted directly or indirectly with a position of public or private authority, particularly to acquire personal benefit of any kind, 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 offered for benefits of external organizations.

"Sponsorship" means the sum of financial assistance offered for the purpose of business or reputation of the sponsorship's owner.

"Gift, Hospitality, and Expense" means the expense 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, committee members, executives, employees, and staff members belonging to the AOT.

Responsibilities

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

2. **Audit Committee**
   - Monitor and inspect policies and guidelines for anti-corruption and bribery efficiently and appropriately.
   - Monitor the internal audit and prepare reports on financial transactions and other types of implementation and policy related to anti-corruption and bribery.
   - Review reports on financial and accounting transactions, internal audit systems, and risk management procedures to comply with international standards with effectiveness and modernity.
   - Review risk assessment policies and procedures and provide the AOT Committee with suggestions on desirable practices developed to reduce possible risks, where all suggestions are expected to be acknowledged and applied by all executives of the organization.
   - Report on the result of internal audits of the anti-corruption and bribery policies and measures to be acknowledged by executives and employees at all levels on a regular basis.
3. **Good Corporate Governance Committee**
   - Determine monitoring guidelines and implementations towards anti-corruption and bribery.
   - Determine and review anti-corruption and bribery policies and measures on a regular basis.
4. **Risk Management Committee**
   - Monitor and support the implementation of risk management and anti-corruption and bribery policies, while efficiently and appropriately developing effective risk assessment and anti-corruption and bribery policies and procedures.
5. **Board of Directors and Executive Management**
   - Seriously and consistently monitor and encourage all employees and staff members to comply with the anti-corruption and bribery policies.
   - Determine effective risk assessment and anti-corruption and bribery policies for the implementation of risk-based activities.
   - Foster the encouragement and support for the anti-corruption and bribery policies to be acknowledged by AOT personnel and other stakeholders.
   - Review the appropriateness of developed measures and procedures to comply with the changing business aspects, rules, regulations, and enactments of laws.

Practice Guidelines

All AOT executives and employees have been encouraged to comply with the following practice guidelines.

1. Strictly pursue the anti-corruption and bribery policies and never get involved in any corrupt action, either directly or indirectly.
2. It is strictly prohibited for AOT personnel to accept or agree to any form of corruption directly or indirectly, particularly to seek personal gain 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 requester or receiver of the charitable contribution or sponsorship shall be

required to report on the progress of performance complying with objectives of the request for the charitable contribution or sponsorship granted by the AOT.

4. The offer and acceptance of gifts, presents, properties, or benefits, which shall include all types of welcoming services and other related expenses, shall be practiced for business or conventional purposes only. Each offer and acceptance shall not exceed 3,000 baht (Three Thousand Baht Only).

   In addition, it is strictly prohibited for all AOT executives and employees to accept any gift, present, property, or benefit specified in the first paragraph if the acceptance shall be deemed to have caused any certain impact on the duty-based determination or business operations of the organization.
5. The AOT has developed effective internal audit procedures, particularly for sales and marketing sections, while being able to efficiently arrange the procurement of quality materials and the contract signing of expected projects. It is also required to develop efficient risk assessment policies to hinder the attack of corruption and seek appropriate solutions for the problems of corruption.
6. The AOT has strategically developed effective methods in human resources management covering the recruitment, appointment, promotion, training programs, evaluation, and offers of remuneration for outstanding personnel to reflect the genuine commitment to the prevention and elimination of anti-corruption and bribery.
7. The AOT shall not demote any position, apply harsh penalty, or provide negative feedback to their executives or employees who refuse to accept any corrupted practice, even though such refusal may possibly affect the AOT's business opportunity. Additionally, the AOT has applied effective communication strategies to cope with the anti-corruption and bribery policies.
8. The AOT has arranged an orientation program for new employees, which includes the development of communication and training programs for AOT personnel so as to consistently and appropriately foster genuine understanding towards its anti-corruption and bribery policies while keeping all executives and employees informed about the penalties for being involved in any corrupted practice.
9. The AOT has advanced its document storage procedures, particularly for financial documents, to allow prompt inspection based on accuracy and appropriateness of business operations while ensuring that all information is kept on record and no transaction remains unexplainable or untruthful.
10. The AOT has developed effective internal audit and financial control procedures to reflect the effectiveness of its anti-corruption and bribery 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 and bribery policies for its affiliates, subsidiaries, agents, stakeholders, third parties, and public representatives to make use of the anti-corruption and bribery policies effectively and practically.
12. The AOT has arranged effective communication channels for the filing of clues and the determination of penalties for any executive or employee 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 and regulations.

13. The AOT shall always provide fairness and protection for its executives, employees, and other third parties who have clues or evidence of any corrupt action while ensuring that they can confidently access a certain communication channel and information, particularly when they require suggestions on the anti-corruption and bribery policies.
14. The Board of Directors and Executive Management shall be responsible for reporting of performances related to the anti-corruption and bribery policies to be acknowledged by the Audit Committee, Good Corporate Governance Committee, and AOT Committee at least once a year.
15. In cases where any doubtful evidence of corruption or bribery may arise, it is required to immediately proceed with unbiased investigation on such evidence and report details of such evidence to the Audit Committee, Good Corporate Governance Committee, and AOT Committee accordingly.
16. The AOT has strategically developed review procedures on the anti-corruption and bribery policies on a yearly basis to allow for changing business aspects, rules, regulations, and enactments of laws.

Penalties

Any direct or indirect action deemed as a violation under the anti-corruption and bribery policies shall be considered with disciplinary measures specified by the AOT. Any violation shall be prosecuted and penalized under legal practices.

****