



# THAILINK 2012 INTERNATIONAL CO., LTD.

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Policy No. 003/2025

Anti-Corruption Policy

(ANTI-CORRUPTION POLICY)

This policy has been stated in the Anti-Corruption Section.  
in ethical guidelines

This policy is set out in the Anti-Corruption section of the Code of Ethics. Thai Link 2012 International Co., Ltd. prohibits bribery and corruption in all business dealings in all countries. This policy applies to all activities within the Company and with other organizations, whether between the Company and private sector entities or between the Company and government officials. In particular, there is a strict prohibition on attempts to influence government officials and activities by government personnel supervised or controlled in connection with commercial activities.

The transparent payment regulations under the Anti-Corruption Policy are as follows:

Employees and intermediaries are prohibited from making, offering or accepting bribes, payments or valuables to obtain or maintain contracts, business, government approvals, tax and customs facilitation or to secure benefits from improper business for any organization or for personal gain. Bribes, kickbacks, illegal payments or benefits that are unethical are prohibited even if they are normal practices for others in the industry or industry in which the Company operates. To emphasize such requirements, the Company has established the following policies:

The Company shall maintain books and records of account which honestly reflect the Company's business activities and shall maintain an adequate system of internal accounting controls. Books and records shall be kept in such detail as to reflect the transactions and use of the Company's assets. Any other books of account related to intermediaries or private companies, foreign governments or other entities is a violation of this Policy.

## Guidelines for reviewing and understanding the following issues:

1. The value of the payment. Anything that has value is to be interpreted in a broad sense. Usual examples include cash, gifts, meals, entertainment, stocks, personal property, forgiveness of debts, charitable donations, and services rendered. Even if the value is small, there is always the potential for abuse, which must be avoided.

2. Effectiveness of the Offer. Under the laws of many countries, companies determine that even if an offer of bribe has been withdrawn, whether or not it has been paid or the recipient has not taken any action, a breach will be considered to have occurred at the time the offer was made.

3. Government Officials or Private Companies. The Company's policy prohibits bribery and corruption between the Company and its business partners, including between the Company and government officials. This applies only to bribes paid to domestic or foreign government officials, with provisions for fines or penalties for violations. In many countries, the government may have a partial ownership interest in an entity with which the Company transacts, and it is not clear whether the Company is a business partner or has some level of government ownership. Therefore, it is necessary not to engage in offering bribes or improper payments.

4. Use of other agencies or intermediaries. The Company has used agencies to assist in the delivery of products or services. It is necessary to understand that bribery or payments to these intermediaries are prohibited. The Company is liable if any agency or subcontractor has illegally paid a bribe to an existing or potential customer. Improper bribery shall not be made to friends or relatives of employees of customers or government officials if the Company knows or believes that the payment will benefit the customer or government official for improper purposes.

5. The selection of agencies and intermediaries is essential in determining the business objectives that the agent or intermediary must meet, understanding those with whom the company is doing business and ensuring that actions taken on behalf of the company are ethical and consistent with applicable policies, laws and regulations. Internal processes must be developed to verify the initial selection of agents and intermediaries and their integrity throughout the relationship.

6. The same level of due diligence shall be applied in the selection of joint investors, acquisition candidates and their representatives and agents. The Company shall be responsible for any improper activities undertaken by the acquiring entity or by the joint investors, and shall, if any, take the necessary actions to 1) conduct a review of the potential risk areas; 2) implement a compliance plan; or 3) cease such improper activities.

7. Refunds, Advances, Discounts Like many organizations, companies sometimes arrange for refunds, advances, discounts, and payments or discounts to customers in order to obtain or maintain contracts or business as part of an agreed-upon commercial arrangement. Therefore, it is not wrong if it is clearly stated in the contract, is reasonable, and is consistent with current practice, is not a cash payment, is paid directly to a specific customer, is not paid to or paid through any person or independent agency without the approval of a law firm, is properly recorded in the books of accounts, and is in accordance with the terms of the contract.

8. Prevention of Bribery. Legally, the Company may be held criminally liable if it fails to prevent bribery being carried out on behalf of the Company by its employees or agents. In the case of agents, the Company is liable without any knowledge of the bribery.

9. Gifts, Meals, Travel, Hospitality and Entertainment as a matter of practice, the giving of gifts, meals, travel, hospitality and entertainment to customers, suppliers and business partners is reasonable and appropriate and is beneficial to building goodwill and positive relationships. In some cultures, modest gifts are also expected from business partners. We recognise the need to properly record the receipt and giving of gifts.

10. Giving gifts or services that are excessive or inappropriate is not permitted. By their nature, gifts, meals, travel, hospitality and entertainment must be proportionate to the occasion and consistent with the recipient's local policies and laws and regulations in the recipient's country. For example, even if it is appropriate and acceptable for the customer to travel to visit a manufacturing plant, it is necessary to monitor, research or select another factory that meets the business objectives. The duration of the visit must be appropriate to the time required to satisfy the business objectives.

11. Expenses and activities that are part of hospitality, travel, gifts, entertainment and meals must be transparent. In the accounting, each related expense must be referenced, clearly stating the business purpose, activities and the amount of money spent.

12. Charitable Contributions the Company has provided regular charitable contributions to qualified charitable organizations that may pose a risk of violating anti-bribery and anti-corruption laws.

13. There is a risk in making contributions to charitable organizations that are directly requested by government officials or business partners. Such contributions may be viewed as indirect bribes to obtain or retain business contracts or government approvals. Donations made on behalf of the Company must be approved by the Chairman, Board of Directors or a law firm.

## The impact of actions contrary to this policy

1. Violations of anti-corruption and bribery policies and laws can lead to criminal and civil penalties for both the Company and the individuals involved. It is therefore imperative to avoid opportunities or violations of strict regulations. Both fiscal and criminal penalties under specific laws can lead to years of imprisonment or fines that the Company will not pay.

2. Violation of this policy and the law, regulations, will lead to disciplinary action by the company, up to and including dismissal.

The Finance and Accounting Manager is responsible for establishing controls to ensure that the business operates in accordance with applicable policies and legal requirements. Regular audits assist in monitoring and reviewing compliance with applicable policies, procedures and referenced legal requirements.

This Policy is effective from 1<sup>st</sup> April 2025.

(Ms. Lara Kristianna Colombres)

Managing Director