

## **Anti-corruption Policy**

PPIF conducts its business with fairness based on a philosophy that the Company shall demonstrate a keen sense to social responsibility and the best interests of its stakeholders in alignment with the principle of Corporate Governance.

To ensure that PPIF has a proper policy determining responsibility, guideline, and regulation as a tool to prevent corruption from all business transactions, PPIF has arranged a written guideline called “Anti-corruption Policy” in order to prudently make a decision on any of action that could possibly lead to corruption and to serve as an apparent guideline in performing business and effectively developing to sustainability organization.

### **Scope**

This policy applies to all PPIF Personnel. For the purposes of this policy the term ‘PPIF Personnel’ includes:

- Members of PPIF;
- Chief Executive Officer of PPIF;
- Directors of PPIF, by whatever name called;
- Any and all employees and/or staff of PPIF, irrespective of the type or nature of employment.

### **Anti-corruption Definition**

Corruption means any types of bribery; an offering, giving, promising or agreeing to give, demanding or accepting money, assets, or other inappropriate benefits from the government officers, government sectors, private sectors, or responsible person either in direct or indirect action so that such person could proceed or disregard his/her function in order to acquire, retain the business, recommend specific company to the entity, or achieve any improper benefits in business transaction.

Further, the prohibition on corruption applies to the giving of anything of value, not only money. This includes providing business opportunities, favourable contracts and gifts.

Provided that any such act shall not constitute as an act of corruption if the same is permissible under any applicable law, rules, regulations, order of a court of law, or where a standard, custom or business tradition enables to do so.

### **Anti-corruption Policy**

PPIF Personnel are prohibited from operating or accepting every type of corruption both in direct or indirect manner covering every business and related department in all countries or territories PPIF operates in. Further, all PPIF Personnel are equally responsible for the prevention, detection and reporting of corruption as defined herein above. They are further required to avoid any and all sort of activities that could lead to, or imply, a breach of this policy.

## **Roles and Responsibilities**

1. The Board of Directors is responsible for determining the policy, monitoring, and forming an effective system supporting Anti-corruption act in order to affirm that the Management Team intensively concerns, emphasizes, and cultivates Anti-corruption mindset as the Company's culture.
2. The Board of Directors of PPIF may make revision(s) or amendments in this Policy from time to time in order to bring it in line with the prevalent laws, rules, regulations, standards and good practices.
3. The Audit Committee is responsible for revision of financial and accounting reports, internal control, internal audit function, and risk management so that such operations are concise, appropriate, effective, and conformed to global standard.
4. Directors, PPIF Top Executives, and the Management Team are responsible for determining Anti-corruption system, promoting, and encouraging Anti-corruption manner conveyed to all staff and related parties. This also includes reconsideration on system or regulation in order to best adjust with business changes, regulation, standard, and laws.
5. Internal Auditor is responsible for auditing, assessment, and evaluations in business transactions whether they are accurate and complied with guidelines. Approval Authority, standard, laws, and policy in such monitored department in order to assure that the internal controls are sufficient and suitable for probable risk in corruption. This shall be directly reported to the Audit Committee.

## **Anti-corruption Guidelines**

1. PPIF Personnel in every level must follow with Anti-corruption Policy and the PPIF code of conduct by avoiding involving with any course of corruption in direct or indirect manner.
2. PPIF personnel shall not be negligent in any corruption conditions involved directly with PPIF. All such personnel must notify such act to supervisors of responsible person, including collaborate with investigation. Any queries or questions are needed to be consulted by the supervisor of a responsible person who monitors the PPIF Code of Conduct compliance provided in particular channels.
3. PPIFs management or Board of Directors shall provide fairness and safeguard to staff who denies or informs corruption cases relating to PPIF by applying Protection Policy for appellant or persons who incorporate with Anti-corruption information as stated in the Policy.
4. Any PPIF Personnel who commits the corruption is equivalent to misconduct in the PPIF code of conduct. This means such person is needed to consider discipline followed by PPIF standard. Conviction on laws may be applied in case such act violates the laws.
5. PPIF concerns the importance of dissemination, knowledge sharing, and communications with other people who involve or affect PPIF so that those parties shall conform effectively to the Anti-corruption guideline.
6. PPIF strives to create and sustain organization's culture representing that corruption is unacceptable in every business transaction dealing with both public and private sectors.

## **Provision in Implementation**

1. This Anti-corruption policy applies to the entire Human Resource Management process starting from recruitment, promotion, training, evaluation, and benefits provided to staff. Every supervisor in every level must communicate to staff in order to apply in business transaction under their responsibility and to monitor such implementation to be the most effective.
2. Implementation on Anti-corruption Policy should be followed by guidelines in the PPIF Code of Conduct, every PPIF related operation manual, and additional guidelines which will be formulated afterward.
3. To stress the attention on processes which incur a high risk in corruption, the Board of Directors, the Management Team, and the PPIF staff must conform carefully in the following course of action.

### **3.1 Gifts, Hospitality and Expenses**

Giving or accepting gifts, entertainment and hospitality activities must be complied with the PPIF Code of Conduct.

### **3.2 Charitable Contribution or Aid**

Granting contribution or receiving the aid must be transparent and in accordance with stipulated laws by confirming that such transaction shall not be claimed as a bribery act.

### **3.3 Business Relation and Procurement Process with the Public and Private Sector**

All types of bribery or illegal payments are prohibited in all business transactions, PPIF operation, and connection to the government and private sector. Such implementation must be proceeded transparently and in alignment with related laws and regulations.