



ANTI-CORRUPTION POLICY

Anti-Corruption Policy

Thai Airways International Public Company Limited (the “Company”) is committed to conduct business with integrity, honesty, transparency, fairness, and in compliance with good corporate governance, as well as relevant laws, rules and regulations involved in all localities in which it operates. Therefore, the Company has established the Anti-Corruption Policy in order to demonstrate its intention and commitment to combat and refrain from all forms of Corruption, directly and indirectly, by requiring the Company officers and any person associating with the Company to acknowledge and strictly comply with the Company’s Anti-Corruption Policy. The Anti-Corruption Policy is established as follows:

1. The Company officers are obliged and have responsibility to understand and strictly comply with the Anti-Corruption Policy, good corporate governance guidance, as well as the Company’s rules, regulations, and work rules.

2. The Company officers must not, directly or indirectly, commit any acts relating to Corruption, for the benefit to oneself, family, friends, relatives, and acquaintances, whether as a receiver or a giver of bribes, either monetary or non-monetary, to government agencies or private entities to which the Company has conducted its business or contacted with.

3. The Company officers must explore, monitor or immediately notify when witnessing or suspecting any act of Corruption and be cooperative with fact investigation process relating to such suspicions by whistleblowing to the person in charge of receiving complaints in accordance with the Company’s Regulation: “Complaints and Whistleblowing regarding Corruption and Non-Compliance with Laws, Rules and Organizational Regulations”.

4. The Company values of complaints received from the Company officers and any person associated with the Company, who have witnessed any action that may lead to Corruption, or any non-compliance with laws and the Company’s rules, regulations, or orders. The Company will conduct the fact investigation on the basis of fairness, transparency and verifiability.

5. The Company ensures that none of the Company officers will be demoted, punished, or negatively affected from refusing to give or receive bribes. The Company prohibits any forms of intimidation, harassment, or confinement to the Company officers who are committed to complying with the Company’s Anti-Corruption Policy.

The Guidelines of Anti-Corruption Policy

Thai Airways International Public Company Limited (“the Company”) is committed to conduct business with integrity, honesty, transparency, fairness and in compliance with good corporate governance, as well as relevant laws, rules and regulations in all localities in which it operates. Therefore, the Company has established the Anti-Corruption Policy to demonstrate its intention and commitment to combat and refrain from all forms of Corruption, both directly and indirectly, by requiring the Company officers and any person associating with the Company to acknowledge and strictly comply with the Company’s Anti-Corruption Policy.

Definition

"Corruption" means any action or omission by anyone entrusted with a position of authority which results in the abuse of power of that position in any form, whether by giving or receiving bribes to or from government officials or any other person doing business with the Company, whether in the country or abroad, or by using any information obtained from the operation of the Company to secure any inappropriate or undue benefits for the Company, oneself, or any person directly or indirectly involved. Forms of Corruption include giving or receiving bribes, valuables or any other benefits, having conflicts of interest, and obstructing justice, and this shall not only refer to the relationship between the private sector and the government agency, but also cover any transaction between any individual and enterprises in the private sector.

"Company officers" mean management executives, employees of all levels and positions according to all types of contracts binding to the Company.

"Person associating with the Company" means any business partner, any subsidiary associating with the Company, or any person acting for or on the Company's behalf, regardless of any such authorization.

Scope of Guidelines

These Guidelines apply to the Company officers.

Guidelines

1. The Company officers are obliged to strictly comply with the Company's Anti-Corruption Policy and good corporate governance manual, including Corruption prevention processes, and must ensure compliance with all laws relating to anti-Corruption in all localities where it operates without soliciting, acting, admitting or being involved in Corruption in any form, whether directly or indirectly, against oneself, family, friends, relatives, and acquaintances.

2. The Company officers must perform their duties in their responsibilities with adequate capacity and efficiency, as well as with good conscience, honesty, fairness with adherence to morality, ethics, professional ethics, and responsibility.

3. The Company officers must refrain from being involved in any conflict of interest by following the guidelines on the conflict of interest in the Company's good corporate governance manual.

4. The Company officers must follow the Company's good corporate governance manual for giving or accepting gifts, entertainment, hospitality, or any other benefits set forth in the policy of giving or receiving gifts, entertainment, hospitality, or any other benefits of the Company.

5. The Company is obliged to establish a procedure for reviewing, approving, and investigating into the Company's charitable donations and sponsorships, with clear and verifiable evidence in accordance with the Company's regulation: "Donations, Ticketing, Extra Baggage Allowance, and any Other Benefits", in order to ensure that such charitable donations, and sponsorships are not used as a pretext for Corruption.

6. The Company is obliged, on a regular basis, to provide an efficient and appropriate risk management on Corruption.

7. The Company is obliged to provide an internal control system for Corruption, and must establish a procedure for discussing the investigation results of the internal control system relating to anti-Corruption measures for the Company officers, in order to appropriately improve such control measures.

8. The Company is obliged to establish an audit process to ensure that the internal controls of the accounting and data retention processes are audited in order to confirm the effectiveness of the anti-Corruption measures and to ensure that the financial records are sufficiently available for auditing.

9. The Company is obliged to annually review the Anti-Corruption Policy and guidelines for implementing the policy in order to respond to any changes of business conditions, rules, regulations, and legal provisions, and every department has the duty to report the results of their compliance with the Anti-Corruption Policy to the Corporate Compliance Department in order to further report such results to the Chief Executive Officer.

10. The Company is obliged to establish a mechanism to manage and develop its human resources, which reflects its commitment to the Anti-Corruption Policy, including the recruitment or selection, promotion, training, appraisal, and remuneration of the Company officers.

The department who is responsible for organizing the orientation for new employees of the Company and the department who provides training for the Company officers at all levels must constantly conduct trainings in order to disseminate the knowledge and understanding of the Company's policy, as well as relevant penalties in the event of non-compliance.

11. The Company must communicate the Anti-Corruption Policy and relevant penalties in the event of non-compliance to the Company officers.

Additionally, the Company must communicate such policy to persons relating to the Company and its stakeholders, and must disclose information to the public regarding the compliance with this policy through various communication channels in order for such persons to be informed and cooperative in promoting the Anti-Corruption Policy.

Whistleblowing and Whistleblower Protection

The Company provides safe communication and protective measures for whistleblowing, suggestions and complaints including evidences relating to the Corruption, by scanning QR Code through the Company's website www.thaiairways.com or sending e-mail to whistleblower@thaiairways.com. This is in accordance with the Company's regulation: "Complaints and Whistleblowing regarding Corruption and Non-Compliance with the Laws, Rules and Organization Regulations".



In addition, the Company has established Corporate Compliance Department that can provide the Company officers and the Person associating with the Company with confident and safe access. For further information or seeking advice regarding this policy, please contact +662-545-4392.

Penalties

Any act, which has been proven to lead to Corruption, violation, or failure to comply with these guidelines and good corporate governance manual, will be subject to disciplinary action in accordance with the Company's regulations, as well as any applicable penalties under criminal or civil law.