

### 3.1.3 Anti-corruption policy

The conduct of every business transactions of the Company is governed by principle of corporate good governance. All business engagements and commercial dealings of the Company must be transparent, economically justify, explainable and auditable, and are carried out for the benefits of every stakeholders. This governing principle and the duty of obedience and to strictly adhere to every local applicable law are communicated to all employees on a Companywide. The Company regularly spends time and resources to cultivate good and professional business mindsets and practices to every of its employees that every kind of frauds, embezzlements, and the acts of corruptions are not acceptable and subject to a severe penalty and disciplinary actions by the Company. This includes for examples, offering bribe, valuable gifts, to government officers, to individual, to a management of country party, etc. in an exchange for deals, licensed, concessions, etc. A well written policy on the anti-corruption of the Company is published, communicated, and applied to every business transactions and business dealings on a company wide basis. A newly recruit officers and staffs of the Company must be notified with this policy prior to their placements. The Company management has duty and commitment to communicate on a regular basis to their subordinates about the anti-corruption policy.

#### Guidelines

The Company Board of Directors encourages a full investigation and disclosure of every doubtful act in doing business where fraudulent and corruptions are susceptible, in addition the Board of Directors aims to;

- (1) Cultivate the anti-corruption mindset and culture to every employee on a companywide. It is the duty and responsibility of every employee to act against corruptions of all forms, and to prevent fraudulents and embezzlements of all kinds.
- (2) The employee shall refrain from offering and accepting bribes, high value gifts, unreasonable entertainments, and gratuities, of any kinds to and from another counter parties, with intention to induce the counter parties or themselves to do, or not to do actions that are not in line with the principle of good corporate governance, with relevant laws, or with business code of conducts.
- (3) Employee is strictly prohibited from receiving any kinds of benefits, high valuable gifts, unreasonable entertainments, gratuity payments, compensations, etc. that are offered by another party without knowing a clear intention and motivation. However, donation made by the Company to any social and charitable organizations is allowed and must be transparent with proper approval.
- (4) The Company shall organize an ongoing program to create anti-corruption awareness to every employee.

- (5) The Company shall embed a sound control environment in every aspect of work such as in the purchasing activity, the sales and marketing activity, construction activity, etc. This is to ensure that the conducts of every business transactions are transparent and free from any acts of corruptions and frauds.
- (6) Employees can receive a reasonable value of gifts, entertainments, give a ways, etc. that is offered by a business counter party of the Company, from time to time, and only when such offerings are business traditional and customary practices. In case of doubts, employees should seek for advices and proper authorizations from his or her immediate supervisor.
- (7) Employee must be refrained from accepting gifts, entertainments, vouchers, gratuities, give a ways, etc. that deem not to relate with the business of the Company of all kinds.

#### 3.1.4 Lodging and filing of complaint

The lodging and filing of all complaints on all susceptible and doubtful matters that deem to violate or to refrain from a full compliance policies, procedures, and guidelines can be made to the Internal Audit Department, to the Chief Executive Officer, to the Chairman of the Executive Board, and the Chairman of the Board, as is the case will be.

#### 4. Disclosure of information and business transparency

It is a policy of the Company to do a timely disclosure of adequate information of both financial and non-financial performance of the Company to general public. This is made either in the Annual Report (Form 56-2), or the Annual Filing of Information (Form 56-1) in dual languages, Thai and English.

The Company appoints the Company Secretary and Assistant to the Company Secretary to be a channel of communication between the Company and stakeholders includes the Shareholders, securities analysts, investors, government agencies, and other parties on an identical basis. Furthermore, the Company also emphasizes on regular disclosure of true and accurate, reliable, complete, and timely information, both financial and non-financial related to the Stock Exchange of Thailand via an online media such as the ELCID platform, or the website at [www.set.or.th](http://www.set.or.th), the Company website at [www.grandeasset.com](http://www.grandeasset.com) under the caption of Company Secretary.

#### 4.1 Personal interests reporting

Directors, management, officers, and staffs have to regularly report and disclose not only personal interests they have with the business of the Company, but also their spouse's and related person's ones. The said report is sent to the Company Secretary who will in turn report of such personal interests to the Chairman of the Audit Committee within seven business days from the date of receiving the report.

#### 4.2 Governance and control over the use of inside information

The Company plans to cultivate knowledge of good corporate governance principles to its Board of Directors and the management