

Anti-Corruption Policy

Policy Owner: Head of Compliance & Monitoring

Approver: Board of Directors

1 Purpose & Scope

This Policy applies to True Corporation Public Company Limited and its subsidiaries, hereinafter collectively referred to as the "Company", including the Company's directors, management, and other employees, hereinafter collectively referred to as "Company Personnel".

The purpose of this policy is to specify the necessary requirements to meet standards in the Code of Conduct, applicable laws, and regulatory requirements that prohibit any form of Corruption.

The scope of this policy is Corruption, which includes bribery, and trading in influence. Conflict of interests is not Corruption but may be associated with Corruption and is therefore also in scope.

2 Policy Requirement

2.1 Zero tolerance to corruption

The Company has zero tolerance for Corruption. The Company is committed to working against Corruption in all forms both in the public and private sectors, maintaining the highest possible ethical standards and complying with all applicable anti-corruption laws. The Company seeks to avoid even the appearance of misconduct or impropriety with respect to the actions of any of its officers, directors, executives, employees, agents, or representatives.

2.2 Business Courtesies

Neither the Company nor any Company Personnel shall give, accept, provide/arrange or receive improper Business Courtesies. All Company personnel must comply with the Code of Conduct and the Business Courtesy Procedure.

The Company shall:

- regularly monitor gift and hospitality and other Business Courtesy practices through expense processing and reporting.
- maintain appropriate gift and Business Courtesies registers.

2.3 Facilitation Payments

The Company prohibits facilitation payment and shall contractually prohibit its Business Partners from paying facilitation payments on its behalf.

2.4 Intermediaries

The Company shall:

- conduct risk assessment/screening of all intermediaries in accordance with the Business Partner Management Policy to ensure their integrity.
- inform all intermediaries on the Company's prohibition of all corrupt conduct.
- require a written contract to regulate the relationship with intermediaries.
- require contractually that lobbyists promptly disclose to all third parties that the lobbyist represents the Company.
- monitor payments to confirm that costs and expenses are proportional to the services rendered/ received.

2.5 Public Officials

All interactions with public officials shall be transparent, and business relevant matters shall to the extent reasonably possible be documented.

The Company shall:

- closely monitor intermediaries who interact with public officials.
- ensure transparency regarding employment or appointment of current or former public officials to work for the Company.
- not employ or appoint any person that within the last two years has been an official or personnel of any government sector of which the Company was in the process of applying for a license with, or any government sector that has responsibility to regulate, supervise or audit the businesses of the Company.

2.6 Sponsorships, Donations, and Other Social Contributions

The Company shall handle sponsorships, donations and other social contributions in accordance with the Business Partner Management Policy and Procedure, and the Sponsorships and Donation Procedure.

2.7 Conflict of Interest

The Company shall:

- ensure potential, actual, and perceived conflict of interest are adequately addressed and documented.
- promote ethical behaviour through annual conflict of interest declaration by management and other employees.

Anti-Corruption Compliance Program

The Company's Anti-Corruption Program shall consist of the following components, as further described in the Company Procedure Anti-Corruption Compliance Program, which shall be implemented in the Company through a system of procedures, processes and requirements based on the principle of proportionality and risk exposure:

- Leadership focus: "Tone at the Top"
- Risk management
- Governing framework
- Communication and training
- Business partners
- Financial controls
- Monitoring
- Reported concerns and incident management

3 Reporting

Policy Owner shall regularly inform the board of directors on matters relating to the implementation of the Anti-Corruption Policy and other relevant matters (including serious Corruption issues or incidents).

4 Reference Documents

- Code of Conduct
- Anti-Corruption Program Procedure
- Business Courtesy Procedure
- Business Partner Management Policy
- Sponsorship and Donations Procedure

5 Definitions

Business courtesies

Business Courtesies means anything of value, including favors, or benefits provided free of charge or at a charge less than fair market value in a business context. A Business Courtesy may be a tangible or intangible benefit, including, but not limited to, such items as non-monetary gifts, hospitality (such as entertainment, receptions, social events, seminars, meals and beverages), recreation, door prizes, transportation, accommodation, discounts, tickets, passes, sporting events, side excursions or outings, promotional items, or access to someone's time, materials, or equipment

Bribe

When someone attempts to influence the judgment or conduct of a person in a position of entrusted power by offering an improper advantage

Conflict of interests

A conflict of interest is a conflict between a person’s entrusted duty towards the Company on the one hand, and the private interest of that person on the other hand.

Corruption

A common definition of Corruption is “abuse of entrusted power for private gain”. It is necessary to assess the relevant descriptions of the applicable anti-corruption laws to determine whether a specific conduct may legally be regarded as prohibited corruption.

Facilitation payments

A facilitation payment is a small bribe known as a ‘grease payment’ or a ‘speed payment’ typically solicited to facilitate or expedite the performance of a routine transaction or service whereby the amount paid exceeds the rate prescribed by relevant laws (if any)

Intermediaries

Third parties who are engaged to provide services for or on behalf of Company or to represent Company interests

Public officials

Elected or appointed officials, political party officials or candidates for political office, officers or employees of national, provincial, regional or local government agency or department, arbitrators and jurors, employees of government-owned or government-controlled entities, including corporations or partnerships, employees of public international organizations

Trading in influence (also known as influence peddling)

When a person who as real or apparent influence on the decision-making of a public official exchanges this influence for an undue advantage

6 Change Log

Date of Change	Nature of Change