



CORPORATE COMPLIANCE GUIDANCE

CORPORATE COMPLIANCE GUIDANCE





VISION

Leading Integrated Petrochemical Complex
in Asia by 2020

MISSION

- Operational Excellence
- High Performance Organization
- Corporate Social Responsibility
- Value Creation
- Innovation & Creation of New Business



CORE VALUES

INDIVIDUAL OWNERSHIP

SYNERGY

PERFORMANCE EXCELLENCE

INNOVATION

RESPONSIBILITY FOR SOCIETY

INTEGRITY & ETHICS

TRUST & RESPECT

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MESSAGE FROM THE PRESIDENT

IRPC Public Company Limited understands that achieving our goal of becoming one of Asia's top petrochemical companies by 2020 requires more than profit optimization; we also need to be a good, moral, and ethical organization that complies with laws, regulations and standards that apply.

We believe that our **I-SPIRIT** organizational values—which stands for Individual ownership; Synergy; Performance excellence; Innovation; Responsibility towards society; Integrity and ethics; and Trust and respect—are at the core of our organizational culture and integral to our moral fiber; they are reflected in the way we operate.

To emphasize the importance of moving towards this goal in a proper and legitimate manner, as well as to bolster the trust of our stakeholders, the Board of Directors of IRPC Public Company Limited has set forth the Compliance Policy and guidelines for its concrete implementation.



**we also need to be a good, moral,
and ethical organization** that complies
with laws, regulations and standards
that apply.

I hope that these guidelines will allow our executive officers and employees to confidently work towards the achievement of the aforementioned goal. Moreover, these guidelines also hold us accountable for our promise to commit to the policy, as well as provide a channel by which whistleblowers may use to inform us of any possible misconduct. All of this is to ensure that we shall achieve our goal of becoming one of Asia's leading petrochemical companies in a stable and sustainable manner.

(Mr. Sukrit Surabotsopon)
President
IRPC Public Company Limited

COMPLIANCE POLICY

IRPC Public Company Limited and the IRPC Group

The Board of Directors of IRPC Public Company Limited places a great deal of importance on operating the Company in compliance with applicable Laws and Regulations to ensure the achievement of our goal and to garner stakeholders' trust and build credibility. Therefore, the board has developed the "Compliance Policy of IRPC Public Company Limited and the IRPC Group," to unequivocally state our intention and to raise our standards on the following subjects:

1. Compliance with Relevant Laws and Regulations

Directors, Executive Officers, and Employees of the IRPC Group must respect and strictly adhere to the Laws and Regulations governing our business to ensure smooth operations while assuming our corporate responsibility towards society, communities, the environment, and the safety and health of stakeholders, all of which are fundamental elements sustainable development.

2. Competition and Antitrust Laws

Directors, Executive Officers, and Employees of the IRPC Group must comply with antitrust or competition laws. They must also support free and fair competition without discrimination or exploitation.

3. Anti-Corruption and Anti-Bribery Laws

Directors, Executive Officers, and Employees of the IRPC Group must comply with anti-corruption and anti-bribery laws in their dealings with local or foreign government officials or officials from the private sector.

4. Respect for Human Rights and Compliance with Human Rights Principles

Directors, Executive Officers, and Employees of the IRPC Group must respect and obey labor and human rights laws, laborers' rights, women's rights, children's rights, and human dignity, including the liberty and equality of persons recognized or protected by either Thai or international laws.

5. Protection of Intellectual Property

Directors, Executive Officers, and Employees of the IRPC Group must protect and safeguard all intellectual property owned by IRPC Public Company Limited and/or the IRPC Group against infringement or unauthorized use. They must also respect and refrain from infringing upon other persons' intellectual property. The IRPC Group also encourages its Executive Officers and Employees to exercise their creativity to invent intellectual property for the benefit of the Company and the overall economy of Thailand.

6. Anti-Money Laundering and Counter-Terrorist Financing Laws

Directors, Executive Officers, and Employees of the IRPC Group must avoid becoming a money laundering or terrorism financing tool. They must place great importance on monitoring compliance and notifying officials of noncompliance. Records of financial transactions, facts, or assets must be accurately kept in accordance with Thai and international laws.

7. Proper Use and Safekeeping of Company Assets and Data

Directors, Executive Officers, and Employees of the IRPC Group must safeguard company data and assets according to best practices and legal requirements to ensure that company data and assets are used for maximum benefit. They must protect company data and assets against damage or from being used for any person's personal gain. They must also adhere to the principles of confidentiality by adhering to the Code of Conduct and the law: they may not disclose information pertaining to the Company, our customers, our partners, or other persons' private information, or use it for any other purpose beyond the authorized scope, or beyond the boundary of the legal relationship into which the parties have entered according to both Thai and international laws.

8. Responsibility towards the Environment, Health, and Safety

Directors, Executive Officers, and Employees of the IRPC Group must conduct business with responsibility towards society, communities, and the environment, taking into account the health and safety of Employees and Stakeholders. The IRPC Group regularly instills an awareness of this matter among Employees, Executive Officers, and Stakeholders.

All Executive Officers and Employees must comply with all applicable Laws and Regulations. They must also avoid involvement or participation in activities or actions considered unlawful or disruptive of the peace and order or the morality of the people in order to prevent damage to the Company from noncompliance and to enhance our corporate image as a legitimate business organization in the eye of both national and international stakeholders. All of this will foster a robust and steady growth of the Company.

Approved by the Board of Directors at Meeting No. 11/2015
on November 17, 2015.



» SECTION 1

INTRODUCTION, DEFINITIONS, AND USAGE

INTRODUCTION, DEFINITIONS, AND USAGE

Introduction

What is the Compliance Guidelines manual?

This Compliance Guidelines manual comprises principles to be observed by Executive Officers and Employees of the IRPC Group. It is an expression of our concrete and standardized efforts to ensure that our activities and operations conform to the law, as well as to promote an awareness of the possible effects of and damage caused by noncompliance. The goal is to bring about the sustainability of our business.

It should be noted, however, that the primary purpose of these guidelines is to promote an understanding of the Company's policies and regulations. **They are not a summary of all relevant Laws and Regulations** and may not include every situation or give a detailed outline of every process, which may be governed by specific laws or regulations. The parties responsible or involved are required to study every detail and procedure prescribed by the laws governing their respective function.

Who must observe these guidelines?

Every Executive Officer and Employee of IRPC Public Company Limited and its Subsidiaries must adhere to all Laws and Regulations that govern the Company's operations. They must also avoid involvement or participation in activities or actions considered unlawful or disruptive of the peace and order or the morality of the people.

Definitions

“**IRPC**” or the “**Company**” shall mean IRPC Public Company Limited.

“**Subsidiary**” shall refer to one of the following:

- (1) A company whose 50% of its voting shares is controlled by IRPC;
- (2) A company whose 50% of its voting shares is controlled by a company defined in (1);
- (3) A company whose 50% of its voting shares is controlled by a company that is considered a Subsidiary of the Company according to (2) or any of its subsequent Subsidiary;
- (4) A company whose 50% of its voting shares is controlled by IRPC or a company defined in (1), (2), or (3), whether directly or indirectly;
- (5) A company that IRPC or a company defined in (1), (2), (3), or (4) has control over the making of its financial and operational policies to bring about benefits from the activities of the said company. The shareholding of IRPC or of a company defined in (1), (2), (3), or (4) shall also include shareholding of an associate.

The “**IRPC Group**” shall mean IRPC Public Company Limited and its Subsidiaries.

A “**Director**” shall mean a director of IRPC Public Company Limited or of any of its Subsidiaries.

An “**Executive Officer**” shall mean an executive officer of IRPC Public Company Limited or of any of its Subsidiaries, including any person tasked with performing any of the roles of an executive officer.

An “**Employee**” shall mean a full-time employee, a contractual employee, or a consultant, including any person tasked with performing any of the roles of an employee and serving under the supervision of IRPC or any of its Subsidiaries.

“**Stakeholder**” shall mean a person, a legal entity, a community, a group of people, a non-governmental organization, or an organization benefiting or suffering a loss from the operation of the Company. The Company has divided stakeholders into five categories:

1. Shareholders and investors
2. Employees
3. Customers
4. Trade partners, competitors, and debtors
5. Society, communities, and the environment

“**Contracting Party**” shall mean a person or a legal person who has entered into an agreement with the Company whose rights, duties, and responsibilities are set forth in the said agreement. A Contracting Party may be a customer, a partner, an investor, or a contractor who is a Contracting Party to a legal contract with the Company.

“**Business Associate**” shall mean a person or legal person with whom the Company may have come into contact for business purposes, including a government, a governmental agency, a state enterprise, and an organization in the private sector.

“**Other Benefits**” shall mean any things of value or whose value can be calculated monetarily, including discount, entertainment, service, training or any other things of similar nature.

“**Laws and Regulations**” shall mean internal and external rules governing or related to the Company’s transactions, namely

- **External rules** include any law, act, emergency decree, decree, ministerial regulation, ministerial notification, announcement, regulation, order, or statute of a government or a governing agency or treaty, certification, agreement or guidelines of an international organization or any other organization pertinent to the business and activities of the Company.
- **Internal rules** include any guideline, regulation, rule, announcement, or order of the Company or any of its Subsidiaries, the Corporate Governance Handbook, the Code of Conduct, and company policies.

“**Insider Information**” shall mean a fact, document, material, or data that has not been made public or trade information reserved for company use only, including information that the Company has yet to disclose such as financial statements, dividend payment information to be submitted to the Stock Exchange of Thailand or any other case outlined in the Corporate Governance Handbook.

“**Conflict of Interest**” shall mean a situation or action in which a person-whether it be a Director, Executive Officer, or Employee of the Company-may have a personal interest due to his or her status, relation, or any other case that may affect his or her decision making or the ability to perform his or her role and that may affect the Company’s benefit, or a situation that may render that person incapable of making a just decision due to prejudice, status, relation, or any other case that places that person’s interest above that of the organization’s.

Usage

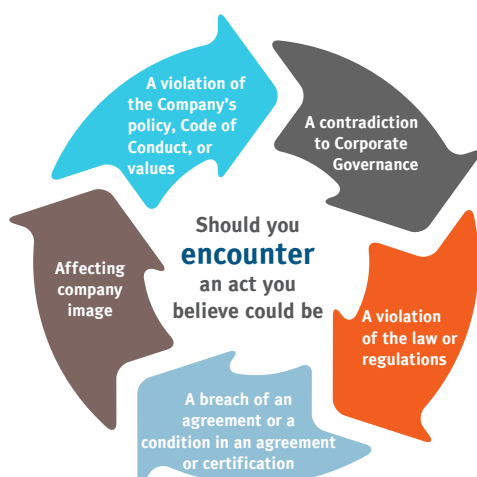
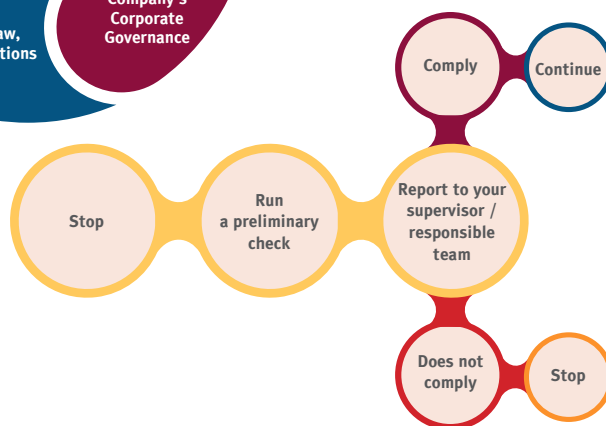
Usage Tips

- Thoroughly study the material.
- Consider topics pertinent to your functions.
- Thoroughly study the Laws and Regulations, both internal and external, that are pertinent to your functions.
- In the case where the law prescribes a set of procedures and specific timelines, a to-do list or a check list should always be used to ensure compliance and thoroughness.

Self-Assessment

All Executive Officers and Employees should pose the following questions to assess themselves, ensuring compliance and avoiding possible negative effects of their action.

1. Does this action comply with Laws and Regulations or moral practices?
2. Does this action conform with policies or principles set forth in the Corporate Governance Handbook and the Code of Conduct?
3. Does this action conform with an agreement made with or certification obtained from other organizations?
4. Does this action negatively impact the image of the organization or negatively affect any stakeholder?



Inform

- A supervisor of any level that you trust
- Internal Audit Manager
- Internal Affairs Manager
- Corporate Secretary
- President of the Audit Committee
- PO Box 35
- Via E-Mail at auditor@irpc.co.th (Internal Audit)
- Ceo.office@irpc.co.th (Company Secretary / Internal Affairs)
- Company website at www.irpc.co.th: http://www.irpc.co.th/th/cg_control_contact.php



» SECTION 2

REGULATIONS, POLICIES, AND GUIDELINES

(According to the Compliance Policy)

REGULATIONS, POLICIES, AND GUIDELINES

(According to the Compliance Policy)

1. Compliance with Applicable Laws and Regulations

Policy

“Directors, Executive Officers, and Employees of the IRPC Group must respect and strictly adhere to the Laws and Regulations governing our business to ensure smooth operations while assuming our corporate responsibility towards society, communities, the environment, and the safety and health of stakeholders, all of which are fundamental elements of sustainable development.”



Principles


- As Executive Officers and Employees, study, understand, and abide by the laws governing the Company’s business, as well as the business of its Subsidiaries. Always verify whether these Laws and Regulations are current.
- Follow policies issued by the Company, including the Corporate Governance Handbook and the Code of Conduct.
- Comply with the rules, regulations, procedures, or standards for internal operations, as well as other contractual conditions. In instances where the law prescribes procedures and methodologies, prepare and use to-do and check lists.

- Violation of rules and regulations pertinent to the Company's internal operations may result in disciplinary action, according to the Regulations on Work B.E. 2551, which may be as severe as dismissal and prosecution.

Guidelines


- Any contract into which the Company enters must comply with the form and criteria prescribed by law. Its purpose must also conform with the law and must not be disruptive of public peace and order or the morality of the people.
- Study and strictly adhere to the approval-process chart, power of attorney guidelines, and the scope of your responsibility. Do not proceed or enter into a contract or make a pledge to another person without adequate authority. Violation may damage the Company, and the violator may be prosecuted.
- Respect and follow the traditions, customary practices, and culture of the community in the area you operate. Local traditions, customary practices, and culture should never be violated.
- Comply with international agreements or standards that the Company has adopted, such as the UN Global Compact, the Sustainable Development Goals, and the OECD Principles of Business Governance


Sample Questions and Answers

 **Question :** If changes are made to the law related to my job, what should I do?

 **Answer :**

1. Notify relevant teams and the Compliance Helpdesk of the changes, or call for a meeting with relevant departments to notify them.
2. Study and understand the new law. Consult a legal expert if needed.
3. In instances where these changes affect contracts, separate contracts under the old law from those under the new law.
4. In instances where company regulations contradict any laws, notify relevant teams to correct them.

 **Question :** What are the differences between Corporate Governance (CG), Corporate Compliance and Corporate Secretary, and Internal Audit? If I find a violation of the law or company regulations, what should I do?

 **Answer :** The three departments converge and complement one another on matters of compliance. Corporate Governance oversees Corporate Governance and the Code of Conduct. Corporate Compliance and Corporate Secretary (Compliance Helpdesk) support the Company in its compliance with Laws and Regulations governing its business. The Internal Audit Office acts as the third line of defense, ensuring that the Company's systems of Internal Control are adequate and effective.

Should you find any violation of the law or company regulations, you can report information about the violator or violation to the Internal Audit Office, who will carry out an investigation. If you have any questions about the Company's business policy, or moral and ethical issues in the Corporate Governance Handbook, you may consult Corporate Governance (CG). For implementation and interpretation of the law, you may ask for advice from the Legal Office or Compliance and Corporate Secretary (Compliance Helpdesk).

Examples of Relevant Laws and Regulations

- Civil and commercial laws
- Labor Protection Act B.E. 2541 (B.E. 2560 Revision)
- Policies, rules, and regulations of the Stock Exchange of Thailand and the Securities and Exchange Commission
- Company regulations, announcements, orders
- Policies of each unit that govern its operations
- Corporate Governance Handbook
- Code of Conduct

Examples of Additional Resources

- Ordinance
<http://www.krisdika.go.th/wps/portal/general>
- Gazette
<http://www.mratchakitcha.soc.go.th/index.html>
- United Nations World Agreement
<https://www.unglobalcompact.org>
- OECD
<http://www.oecd.org/corporate>
- Stock Exchange's Good Corporate Governance
http://www.set.or.th/en/about/overview/setcg_p2.html?printable=true

2. Competition and Antitrust Laws



Policy

“Directors, Executive Officers, and Employees of the IRPC Group must comply with antitrust or competition laws. They must also support free and fair competition without discrimination or exploitation.”

Principles

- Comply with Thai antitrust or competition laws, rules, and regulations, as well as international antitrust standards, including international trade laws.
- Do not act or enter into an agreement with a competitor or any other party, or collude with other manufacturers, to reduce or discourage free trade, or form a monopoly of trade, such as agreeing to determine the volume of production, joint pricing, customer-facing pricing, customer and market segmentation, or forcing customers to buy or pay for a service or agree to unfair terms.
- Do not disclose or exchange confidential business information with operators of the same type of business as defined by the Trade Competition Act, such as price and discount information, manufacturing cost and capacity, volume of sales or orders, marketing plans, profit margins, credit terms,

acquisition of contact information and confidential information of customers, partners, or other manufacturers.

Guidelines


- Avoid unfair trade practices such as the use of negotiating power to limit trading partners' trade opportunities or choices.
- The Company places importance on compliance with antitrust laws. Violation of these laws will cause serious damage. The Company, its Executives Officers, and Employees involved will be held liable for civil damages or face criminal penalties, namely fines and imprisonment.
- Study and comply with import and export laws, customs laws, anti-dumping and countervailing of foreign products laws, and safeguard measures against increased imports of countries to which the Company export to minimize the effects of international trade barriers. Violation of such laws abroad will result in a fine or countervailing duty (CVD) or being blacklisted in that country.


Antitrust Offenses

- **Abuse of dominant position**
 - (1) Unfairly establish or maintain a purchase or sale price of goods or services.
 - (2) Unfairly impose conditions directly or indirectly that force other businesses who are your customers to limit service, production, purchase, or distribution, or limit the opportunity to buy or sell goods or to limit the opportunity to obtain loan services from or provide them to other business operators.


- (3) Suppressing, reducing, or limiting services, production, purchase, distribution, delivery, or importation into the kingdom without a just cause, or destroy or damage goods to reduce their volume below the current market demand.
- **A merger, acquisition, or amalgamation** that may result in a monopoly or unfair competition, according to the Competition Commission's regulations published in the Gazette, unless permitted by the Competition Commission.
- **A cartel** that gives a monopoly power, or reduces competition or restricts competition in a particular market, such as joint price fixing, product or service sales restriction, market share allocation, jointly determining the purchase price or quantity or prices of goods to be purchased, market share collusion, collaborating to set auction prices to guarantee that one party wins the auction, or an agreement to take control of the market.
- **Agreements with overseas business operators to discourage domestic purchases:** a business relationship with a foreign business operator that restricts people in a country wishing to purchase a product or service to purchasing such goods or services from a foreign business operator.


Sample Questions and Answers


 **Question :** What types of action are considered a violation of antitrust and international trade laws?


 **Answer :** The following are considered a violation of antitrust and international trade laws.

1. Attending a meeting with a business operator to obtain information or set the cost, price, or market share of a product or service.
2. Agreeing with a Contracting Party on the selling price or customer and market segmentation.
3. Merging with other companies in the same type of business to dominate a market, in which the Company sells its goods and services.
4. Exporting goods from one country to another, where the price of the exported goods is set lower than that of the same product sold domestically.

 **Question :** When I talk to a relative who works in a competing company, can I ask them personally about marketing information, customers, or costs of the company they work for?

 **Answer :** Trade inquiries, even when made through a person with whom you know well personally, is considered a breach of business ethics. In addition, should you receive commercial information by other means and are in doubt, consult a supervisor, relevant teams, and the Compliance Helpdesk prior to taking any action.

 **Question :** In case of a meeting where business guidelines, including facts, opinions, and information, are shared among operators of the same business, how should a company representative do?

 **Answer :** Consider the purpose of the meeting. If it is a meeting to seek a mutual agreement on determining production volume, selling price, or customer or market segmentation, decline the offer to attend such a meeting since it may be considered a violation of the antitrust law.

Examples of Relevant Laws and Regulations

- Trade Competition Act B.E. 2542
- Import-export laws
- Anti-Dumping and Countervailing of Foreign Products Act B.E. 2542
- Safeguard Measures Against Increased Imports Act B.E. 2550
- Corporate Governance Handbook
- Code of Conduct

Examples of Additional Resources

- World Trade Organization (WTO)
https://www.wto.org/english/tratop_e/adp_e/adp_e.htm
- ASEAN
<http://asean.org/>
- Office of the Competition Commission, Ministry of Commerce
<http://otcc.dit.go.th/?lang=en>

3. Anti-Corruption and Anti-Bribery Laws



Policy

“Directors, Executive Officers, and Employees of the IRPC Group must comply with anti-corruption and anti-bribery laws in their dealings with local or foreign government officials or officials from the private sector.”

It is company policy to conduct our business honestly, ethically, and fairly at every stage of our operation. Whether at home or overseas, the Company always complies with applicable Laws and Regulations. Because we believe that growth is rooted in business capabilities and the ability to garner trust from all sectors, we make certain that every level of our operations is transparent, accountable, and lawful.

The Company insists that offering, giving, and taking bribes from local and foreign government officials, or local and foreign officials from the private sector, is prohibited and a violation of company policy, although, in our adherence to the policy, the Company may lose business opportunities.

Principles

- Executive Officers, Employees, and those involved in the Company’s business must adhere to anti-corruption and anti-bribery measures, namely the Anti-Corruption Policy, anti-corruption laws, international efforts that the Company and Thailand have joined, such as the UN Global Compact,

the United Nations Convention Against Corruption, and the Thai Collective Action Coalition Against Corruption (CAC)

- o Accepting bribes of any form is a severe ethical violation, which will result in punitive disciplinary action or criminal charges. Always be aware that accepting bribes will destroy the honor, reputation, and image of both yourself and the Company.

Guidelines


- o Perform your duties with transparency, be able to explain your procedures and rationale, and be ready for an audit from the authorities.
- o Do not offer or give money, assets, gifts, entertainment, trips, or Other Benefits to any person-including spouses, children, or any persons with relations to government officials, clients, partners, and contacts-for the benefit of your own, your function, or your business, or allow any person to do so on your behalf.
- o Traditional offering of gifts or memorabilia, such as New Year's gifts, may be permitted as long as the law and local customs allow it. For instance, the National Anti-Corruption Commission allows a gift of up to three thousand (3,000) baht per person, per occasion. Furthermore, such gifts should be given in a manner that promotes the image of the IRPC Group or the PTT Group, according to the Group's Anti-Corruption Policy regarding receiving and offering gifts, meals, or other benefits.


Offering memorabilia to mark a special business occasion, such as founding day and signing of a business agreement, may be permitted. Should each item be worth more than three thousand (3,000) baht, you must obtain approval from the Chief Executive Officer or strictly follow company regulations.

- Do not ask for money, assets, gifts, entertainment, trips, or Other Benefits from any person for the benefit of your own, your function, or your business, or allow any person to do so on your behalf.
- Personnel of the IRCP Group shall refrain from accepting gifts or Other Benefits in all cases. It is also their duty to thoroughly inform outsiders of this policy.
- In an event that gifts, memorabilia, or Other Benefits have been obtained and you are unable to return them, it is your responsibility to notify the Company or responsible unit to collect them for donations to persons or agencies outside the Company, whether in the form of charity or for the public good, in accordance with the IRCP Group's regulations.
- Political aid, charitable donations, financial support, gift expenses, certification expenses, and other expenses shall be subject to the Code of Conduct and the Corporate Governance Handbook. Donations and support may be given to in the name of one of the companies belonging to the IRCP Group to a governmental agency or official or a charitable organization that is credible and/or legally established.


- Offering a business meal must be done prudently. It must be based best practices and must not violate the Anti-Corruption Policy.
- Jointly organizing a corporate social responsibility event with governmental agencies or officials may be permitted when appropriate. It must be done under the name of one of the companies belonging to the IRCP Group. All in all, there should be clear criteria, plan, and evaluation. It must also follow established company procedures.
- Accepting an offer to attend a meeting, training session, seminar, or company visit with a trade partner's budget must comply with terms and conditions in relevant agreements or company regulations. You should not accept an offer to attend any of these events that include tourism without a true desire to obtain knowledge.
- Avoid situations or activities that may lead to a Conflict of Interest. Do not let your positions, relations, or personal matters influence you when deciding on matters of company transactions to prevent the Company from suffering serious damage to its reputation and image.
- Should you find an event that may be considered corruption or bribery or unlawful exploitation, report it through one of the Company's many whistleblower channels. All information will be treated with confidentiality. All cases will be investigated and processed according to the established procedure.
- The Company will take the most serious action whenever corruption, bribery, or unlawful exploitation is found.


Sample Questions and Answers


 **Question :** If I receive a gift from a business, a trade partner, or a business partner, what should I do?


 **Answer :** You should decline the offer and inform them of the Company's gift policy, which only allows accepting a gift of up to three thousand (3,000) baht in value and that is either occasionally or traditionally appropriate, and that accepting such a gift cannot be for the benefit of your own, your function, or your business.

In instances where you need to accept gifts, memorabilia, or Other Benefits that do not comply with the aforementioned criteria and that cannot be returned, notify the Company or responsible unit to collect them for donations to persons or agencies outside the Company, whether in the form of charity or for the public good, in accordance with the IRCP Group's regulations.

 **Question :** When I, whether as an Executive Officer or Employee of the Company, am invited by an outside agency to give a lecture or talk about my experience working for the Company during the Company's operating hours and that invitation entails some monetary compensation, what should I do?

 **Answer :** You need to report to your immediate supervisor and pass such compensation to the Company because it arises from performing a task during company hours and using company knowledge. Such compensation is considered part of the Company's revenue.

 **Question :** When the Company receives an invitation to provide support for a golf tournament, kathin ceremony, phapa ceremony, other charitable donations, or a governmental agency, or a person involved in the Company's operations, what should I do?

 **Answer :** You need to consider whether the amount of money or the value of things given in support of that cause is suitable and appropriate for the situation. The said support must not be provided with an intent of indirect corruption. It must also be given according to established company regulations.

Examples of Relevant Laws and Regulations

- Criminal Code
- The Organic Act on Counter Corruption B.E. 2542 (and its amendments)
- Notification of the National Anti-Corruption Commission concerning the provisions of the acceptance of property or any other benefit on ethical basis by State officials B.E. 2543
- United Nations Convention against Corruption 2003 (UNCAC)
- The Foreign Corrupt Practices Act of 1977 (FCPA)
- Company regulations on procurement B.E. 2559
- Company regulations on procedures for complaint handling and complaint investigation B.E. 2553
- Corporate Governance Handbook

Examples of Additional Resources

- UN
<https://www.unodc.org/unodc/en/treaties/CAC/>
- NACC
<https://www.nacc.go.th/main.php?filename=index>
- PACC
<http://www.pacc.go.th/index.php/home>
- Justice Department, USA
<https://www.justice.gov/criminal-fraud/foreign-corrupt-practices-act>



4. Respect for Human Rights and Compliance with Human Rights Principles

Policy

“Directors, Executive Officers, and Employees of the IRPC Group must respect and obey labor and human rights laws, laborers’ rights, women’s rights, children’s rights, and human dignity, including the liberty and equality of persons recognized or protected by either Thai or international laws.”

Employees : The Company shall treat its Employees based on their rights set forth in labor laws; occupational stability, safety, and health; and non-discrimination based on ethnicity, religion, gender, and skin color. The Company shall also promote equal opportunity to efficient decent work with human dignity and freedom, as well as refrain from the exploitation of child labor, in accordance with the International Labor Convention of the United Nations’ International Labor Organization, to whom Thailand is a member and whose charter the country has ratified.

Communities : The Company shall conduct its business based on the respect for communities’ rights, taking its effects on health, communities, and the environment into account. The Company shall also ensure community engagement and feedback, as well as respect the local culture and support community participation to foster sustainability in its various forms.

Business Associates : The Company shall select contractual partners, trade partners, contractors, as well as other Business Associates, with track record of social and environmental responsibility and whose business is built upon the foundation of human rights principles.

Principles

- It is part of the Company's duty and covenant to consider human rights. The Company places great importance on the human rights of its Employees, communities, and Business Associates in the supply chain. It is the Company's business philosophy to bolster its business and foster sustainable growth alongside corporate responsibility towards communities, society, and the environment.

Guidelines

Human Rights and Laborers' Rights

- In matters of recruitment, employment, evaluation, promotion, transfer, appointment, training, development, disciplinary investigation, indemnity, and termination, the Company shall take into account the individual's qualifications, knowledge, competence, suitability, and performance, as well as merits, as criteria in the consideration process.
- The Company shall respect the fundamental rights and personal liberty of each individual, complying with labor protection laws; labor relations law; occupational safety, health, and environment; and regulations issued by state agencies. The Company shall not use bargaining power or coerce Employees to enter into an agreement that limits their legal, fundamental rights.
- The Company shall respect the rights and benefits of employees in accordance with the ILO Declaration on Fundamental Principles and Rights at Work and in accordance with the laws and principles of the UN Global Compact.

Equality and Sexual Harassment

- Treat each other with equality, respect, and honor. There shall be no discrimination whether on the basis of personal relations, race, ethnicity, skin color, ancestry, religion, social status, gender, sexual orientation, age, appearance, physical appearance, accent, political opinion, personal opinions, property, or any other status.
- Avoid intimidation, harassment, or verbal abuse or disgrace or parody, or making inappropriate comments, publishing photos or messages to other people, or other forms of communication to perpetuate a scandal that deteriorates workplace morale, including physical or verbal harassment, flirting, or sexual assault, as well as any other acts that illegally infringe upon others.


Personal Rights


- No personal information-such as educational background, financial status, shareholding, health record, criminal record, work history, family profile, honor, reputation, address, telephone number, or information about the their performance as an employee of the Company-shall be disclosed to or discussed with outsiders, without permission, in such a way that causes damage to the person implicated, or to the reputation or image of the Company, except for information provided to governmental agencies or disclosed within the scope required by law.

Women's and Children's Rights

- The Company shall treat women in accordance with the Convention on the Elimination of All Forms of Discrimination against Women, such as providing a safe work environment for pregnant women at a suitable time to prevent harm to the pregnancy or the fetus. The Company shall not terminate, demote, or reduce employee benefits because of the pregnancy, as well as facilitates female staff's role as a mother, such as arranging an appropriate place for the mother to store milk for her baby.
- The Company shall treat children in accordance with the Children's Rights and Business Principles of the United Nations' Children's Fund (UNICEF), which aims to campaign, manage, and prevent activities that may potentially affect children's rights. It is company policy to refrain from employing child labor, respect and promote children's rights, and combat the exploitation of child labor.


Sample Questions and Answers

 **Question :** How do you avoid behaviors that are considered intimidating, threatening, or a human rights violation?

 **Answer :** Intimidation and threats are unlawful acts in the Thai Criminal Code, which defines such acts as coercing any person into performing an act by threatening the said person with danger to their life, body, liberty, reputation, or property or to another person's, including the use of force to coerce the said person into performing an act.

Although some acts do not fall under the aforementioned definition, they are still considered a human rights violation, such as physically or verbally expressing disdain towards another person's status or value, physical or mental differences, nationality, sexual orientation, gender, or education, or defamation or making another person feel scared, sad, or shameful, which results in a mental state that does not permit such as person to work normally. All of these acts should be avoided.

 **Question :** What is the Company doing to promote children's rights?

 **Answer :** The Company promotes children's rights in various ways, such as not using child labor, collaboration with Prosthesis Foundation to support pediatric prostheses, and the development of products that take into account the safety of children, such as Ban-Bac anti-bacterial plastic beads and food grade plastic beads whose colors are derived from natural raw materials.

Examples of Relevant Laws and Regulations

- 10 Principles of UN Global Compact
- Convention of the International Labor Organization
- Labor Relations Act B.E. 2518
- Labor Protection Act B.E. 2541 (and its amendments)
- Constitution of the Kingdom of Thailand (Provisional) B.E. 2557
- Human Resource Management Regulations B.E. 2557
- Regulations on Work B.E. 2551
- Corporate Governance Handbook
- Code of Conduct

Examples of Additional Resources

- Ministry of Labor
<http://www.mol.go.th/anonymouse/home>
- International Labor Organization
<http://www.ilo.org/global/lang--en/index.htm>

5. Protection of Intellectual Property

Policy

“Directors, Executive Officers, and Employees of the IRPC Group must protect and safeguard all intellectual property owned by IRPC Public Company Limited and/or the IRPC Group against infringement or unauthorized use. They must also respect and refrain from infringing upon other persons’ intellectual property. The IRPC Group also encourages its Executive Officers and Employees to exercise their creativity to invent intellectual property for the benefit of the Company and the overall economy of Thailand.”

Principles

- Executives and employees must abide by applicable domestic and international intellectual property Laws and Regulations, such as copyright law, patent law, trademark law, trade secret law, and the WTO’s Agreement on Trade-Related Aspects of Intellectual Property Rights (TRIPS), as well as respect and comply with the obligations of contracts or agreements into which the Company has entered.

Guidelines

- Do not use intellectual property of the Company for your own personal gain or publicize it without permission from the Company.
- Any of the Company’s contract, in which the Company commissions any person to produce anything that may be



considered intellectual property of any kind, must detail and specify that the contractor shall hand over the rights to such intellectual property to the Company.

- All of the Company's intellectual property agreements must be made in writing and clearly identify the owner of intellectual property. In the event that intellectual property rights are granted to someone, the agreement must clearly outline the scope, purpose, and duration of the grant.
- Only an authorized person of the Company may transfer the Company's rights to intellectual property to another person. Such a transfer must strictly follow the established legal procedure.
- To ensure that the Company's intellectual property is protected by law, Employees charged with managing such intellectual property must prepare relevant documents in advance and submit its registration or renewal application to state officials within the period prescribed by law.
- Provide support for the Company-whether it be information, documents, evidence, or as a witness-in the registration, representation, and protection of the Company's intellectual property rights.
- Avoid using intellectual property of the Company's or of another person's without permission because intellectual property rights infringement constitutes a disciplinary offense and may result in a criminal lawsuit and civil damages.
- Executive Officers or Employees who are no longer employed by the Company must submit all of their intellectual property-such as inventions, reports, programs, statistics, blueprints, methods, trade data, manufacturing cost, manufacturing formula,

product pricing formula, software, technical methodologies, manufacturing processes, and other processes in his or her possession-to the Company.

Copyright

The Copyright Act B.E. 2533 defines copyright as the exclusive right to perform any act with respect to the work created by the author. Moreover, this Copyright Act also specifies copyrighted works, namely

1. literary work (books, pamphlets, publications, speeches, computer programs, etc.);
2. dramatic work (choreography, dance, etc.);
3. artistic work (paintings, sculptures, prints, photographs, applied arts, etc.);
4. musical work (melody, melody and lyrics, etc.);
5. sound recording (CD);
6. audiovisual work (VCD, DVD, visual images or visual images with sound);
7. cinematographic work;
8. broadcasting (whether audio or visual or both); and
9. other works of literature, science, or art.

Guidelines

- Permission from the Company is required to use, duplicate, adapt, disseminate, or publicize any of the Company's copyrighted works, whether as a whole or in part.
- Be mindful when using copyrighted works, especially imagery, literature, music, audio recording, visual recording,

or audio and visual recording, in your function or on social media. It is important to study relevant regulations concerning legitimate use of intellectual property.

Patents and Petty Patents

The Patent Act B.E. 2522 defines a patent as a document issued by the state to grant protection to an invention or a design and an exclusive right for the inventor or designer to produce and/or distribute that patented work for a specified period. It also defines a petty patent as a document issued by the state to grant protection to an inventive creation whose nature is similar to an invention but whose creation does not involve much technical advancement, or is a minor invention that offers better utility.

Guidelines

- Treat information about an invention, product design, or process that improves a product or process that has yet to receive a patent or petty patent with the utmost confidentiality.
- Should another person work on or have access to information about an invention, product design, or process that improves a product or process, he or she needs to sign a confidentiality agreement for such work.

Trademark

The Trademark Act B.E. 2534 defines a trademark as a mark or symbol or brand used to distinguish trademarked products or services. The marks under the protection of the Act includes trademarks, service marks, certification marks, and collective marks.

Guidelines

- Permission must be obtained from the Company before using its trademark or brand. Careful consideration must be given to the appropriacy of its use, which is for the sole benefit of the Company.
- To distribute products of the Company in a foreign country, consideration must be given to registration of company trademark in that country and/or registration of company trademark under the Madrid Protocol for the Company's benefit of receiving protection under trademark law.

Trade Secrets

The Trade Secrets Act B.E. 2545 defines trade secrets as trade information not yet publicly known or not yet accessible by persons who are normally connected with the information, the commercial value of which is derived from its secrecy and that the controller of the trade secrets has taken appropriate measures to maintain such secrecy. Executive Officers and Employees who possess or control and persons assigned to maintain trade secrets, such as trade information, manufacturing cost, manufacturing formula, product pricing formula, patterns, software, technical methodologies, manufacturing process, business administration information, details of product prices, customer roster, marketing strategies, etc., must

safeguard trade secrets and adhere to the Company's policies, regulations, provisions, or agreements.


Guidelines


- Executive Officers or Employees who possess or control and persons assigned to maintain trade secrets must establish various measures to effectively control the said information. For example, place the "Confidential" seal on a document containing trade secrets.
- Store such information in a safe place, such as in a safe, or using a password or key to access it.
- Prohibit the access to trade secrets without permission or forbid access outside a designated area.
- A system to track the flow of such information and its whereabouts should be utilized, such as implementing a control system that alerts you whenever a document leaves its designated area.
- There should be a system to audit the company's information under a confidentiality agreement, verifying whether such a contract is fulfilled, especially when the term of the contract comes to an end. Has the document been returned or destroyed as specified in the contract?
- Be mindful when an outsider visits your establishment. Thoroughly check whether news, documents, or articles present have any references to trade secrets.
- Establish a procedure by which unused documents are destroyed, whether they contain company or Contracting Parties' information, as soon as their use has ended or they have matured to the age prescribed by law.

Computer-Related Crime Offenses


- Study and familiarize yourself with the content of the Computer-Related Crime Act B.E. 2550, which details the following as criminal offenses:
 - Accessing another person's computer system with specific security measures
 - Intercepting another person's nonpublic computer data during transmission
 - Unlawful deletion, alteration, or addition of another person's computer data
 - Suspension or deceleration of another person's computer system or interference of computer data transmission via electronic mail (E-Mail)
 - Entering inappropriate data into a computer system that may cause damage to the Company or another person, such as false or fake data, obscene data, data sensitive to national security, etc.
 - Dissemination or transfer of inappropriate data or of any data without permission that may cause damage to another person, whether the data was of your own creation or someone else's
 - Allowing another person to store inappropriate data on a computer system under your supervision, creating or editing an image of another person with an intent to cause damage to his or her reputation or cause him or her to be scorned, hated, or embarrassed.


Sample Questions and Answers

 **Question :** What are the Company's guidelines on the use of information technology?

 **Answer :** Whether you are an Executive Officer or an Employee, follow these guidelines.

- Do not use a cellular phone, computer, or any other IT device in a way that is unlawful or a violation of morals and ethics, such as uploading, downloading, forwarding or viewing obscene imagery or crude information, gambling data, or illegal data.
- Do not perform any act that could be considered a criminal offense under the Computer-Related Crime Act. Contact the ICT Department if you have any inquiries.

 **Question :** If I am invited, whether as an Executive Officer or an Employee, to pen an article in a book or magazine about the Company's business operations, what can I do to make sure that I don't violate the regulations on the use of company information?

 **Answer :** In any publication, you can use general information of the Company, such as the Annual Registration Statement (Form 56-1) or the Annual Report (Form 56-2), both of which are already public information, without obtaining permission. Nonetheless, you should verify the accuracy of such information before publication.

As for other specific information, such as business contacts or negotiation, which is considered insider information, you must obtain permission prior to its disclosure to the public. The information you can use for such publication must not include processes, methodologies, trade information, manufacturing cost, manufacturing formula, product pricing formula, or any other confidential information of the Company.

Examples of Relevant Laws and Regulations

- Copyright Act B.E. 2537
- Patent Act B.E. 2522 (Amended)
- Trademark Act B.E. 2534
- Trade Secrets Act B.E. 2545
- Electronic Transactions Act B.E. 2544
- Computer-Related Crime Act B.E. 2550
- TRIPS Agreement
- Company regulations on information technology management B.E. 2557
- Company regulations on marketing management B.E. 2557
- Corporate Governance Handbook

Examples of Additional Resources

- Department of Intellectual Property
<https://www.ipthailand.go.th/th/dip-law-2.html>
- World Intellectual Property Organization
<http://www.wipo.int/portal/en/index.html>
- Department of Intellectual Property, Ministry of Commerce
<https://www.ipthailand.go.th/th/home.html>

6. Anti-Money Laundering and Counter-Terrorist Financing Laws

Policy

“Directors, Executive Officers, and Employees of the IRPC Group must avoid becoming a money laundering or terrorism financing tool. They must place great importance on monitoring compliance and notifying officials of noncompliance. Records of financial transactions, facts, or assets must be accurately kept in accordance with Thai and international laws.”



Principles

- It is the duty of every Employee to adhere to the established policy and procedure to prevent their involvement in money laundering and to ensure the Company’s compliance with related regulations on financial reporting.

Guidelines

Anti-Money Laundering Guidelines

Money laundering is the use of money or assets derived from crime to invest in a legitimate business, the purpose of which is to conceal the source of money or assets invested and to be able to benefit from the profit.

Crimes under anti-money laundering and counter-terrorist financing laws may include drug offenses, sex-related offenses (e.g. women and children trafficking or prostitution), deceit, financial fraud or misappropriation, unlawful exploitation of a state official position, extortion, evasion of customs duties under customs law, terrorism offenses under the Penal Code, illegally hosting gambling, election-related offenses, and human trafficking.


- Executive Officers or Employees should run a background check-exercising principles such as know your customer (KYC) and customer due diligence (CDD)-on their customer, Contracting Party, or business partner for facts, such as authorized directors, majority shareholders, locations, headquarters, business objectives, capital sources, business history, profitable businesses, etc. All of this could be retrieved from governmental agencies or other organizations, including credible media sources.
- Do not carry out any transactions with a person suspected of committing an unlawful act or manage assets or revenue linked to a crime. Should you become aware that a customer's, Contracting Party's, or business partner's transaction defy normal business practices, such as accepting or giving conditions that are too good to be true, or suspect that they may be guilty of money laundering, report your suspicion to the Company through one of the channels available.
- The Company must not purchase, use, or possess assets derived from illegal activities, unless they are obtained from the auction of enforcement agencies.


- Collaborate with relevant agencies and comply with anti-money laundering and counter-terrorist financing laws both at home and overseas.
- Notify any customer, contracted party, or partner to avoid any action whose nature is to conceal the acquisition, distribution, sale, transfer, or possession of any asset according to anti-money laundering and counter-terrorist financing laws.
- Store documents containing information or history of a customer, contracted party, or partner for at least five (5) years after the relationship with them has ended.

Counter-Terrorist Financing Guidelines

- Making payments by way of remittance to a person who is unknown or not the Contracting Party, client, or partner of the Company in countries with violent terrorism.
- Payments in cash or an equivalent of cash are prohibited before the due date, taking into account normal business practices.
- Accepting payments with financial instruments that cannot be linked to the payer is prohibited, except under normal conditions set by a financial institution.


Sample Questions and Answers


 **Question :** How should I prevent myself from any involvement in violation against anti-money laundering and counter-terrorist financing laws?

 **Answer :** To prevent yourself from any involvement in violation against anti-money laundering and counter-terrorist financing laws, ask yourself the following questions:

1. Has my Contracting Party, customer, or partner refused to give information or given incomplete or incorrect information?
2. Is the business proposal too good to be true or does the agreement have an abnormally complicated structure?
3. Has the partner asked the Company to make payments via remittance to or from a country that is unrelated to the transaction? Is that country known for terrorism?
4. Are forms of payment detailed in the contract abnormal, such as remitting to an unknown account or having conditions that deviate from normal business practices?


Should you say yes to any of the aforementioned questions, tread carefully. You may be committing a crime under anti-money laundering and counter-terrorist financing laws.


 **Question :** How do I run a background check on a Contracting Party, customer, or partner?

 **Answer :** Run a preliminary background check on your Contracting Party, customer, or partner using the following principles:

1. know your customer (KYC) and 2. customer due diligence (CDD).

1. **Know your customer (KYC)** refers to your familiarization with your Contracting Parties, customers, or partners, whether they be legal persons or individuals. **For legal persons**, your background check should include name and location of their headquarter, registered capital, year of establishment, company objectives, tax identification number, seal, directors, authorized directors, signatures of authorized persons, majority shareholders, business history with other companies both in Thailand and overseas, revenue and profit, and profitable businesses. **For individuals**, your background check should include their first and last names, date of birth, national identification number or passport number, nationality, domicile, spouse, occupation, workplace, contact address, and telephone number.
2. **Customer due diligence (CDD)** refers to an investigation into a person to see whether they are suspected of a crime or has carried out a transaction that significantly deviate from standard practices-such as being on a sanction list, a warning list, or a politically exposes persons list (PEP); working in a high-risk business; having a nationality, workplace, address, or funding from any of the Non-Cooperative Countries or Territories (NCCT)-into business characteristics, such as unusual payment terms that deviate from standard business practices, listing remittance to an unknown account as a payment instruction or listing a payee who is not a Contracting Party, customer, or partner of the Company, or having transferred funds to accounts in a country known for terrorism, and into their recordkeeping.

 **Question :** What should I do when a debtor specifies that payments shall be made to an unknown person who isn't a Contracting Party in the contract?

 **Answer :** Consider whether the country to which the payments will be remitted is known for terrorism. If it is, you cannot make payments under any circumstances.

Examples of Relevant Laws and Regulations

- Anti-Money Laundering Act B.E. 2542
- Prevention and Suppression of Financial Support for Terrorism Act B.E. 2556
- UN Sanction List
- United Nations Security Council Resolution on Counter-Terrorist Financing
- International Convention for the Suppression of Financial Support to Terrorism
- Corporate Governance Handbook
- Code of Conduct

Examples of Additional Resources

- Anti-Money Laundering Office
<http://www.amlo.go.th/>
- ASEAN
<http://asean.org/asean-convention-on-counter-terrorism-completes-ratification-process/>

7. Proper Use and Safekeeping of Company Assets and Data

Policy

“Directors, Executive Officers, and Employees of the IRPC Group must safeguard company data and assets according to



best practices and legal requirements to ensure that company data and assets are used for maximum benefit. They must protect company data and assets against damage or from being used for any person’s personal gain. They must also adhere to the principles of confidentiality by adhering to the Code of Conduct and the law: they may not disclose information pertaining to the Company, our customers, our partners, or other persons’ private information, or use it for any other purpose beyond the authorized scope, or beyond the boundary of the legal relationship into which the parties have entered according to both Thai and international laws.”

Company assets-whether tangible, financial, intellectual, or informative-are valuable and must be utilized efficiently for maximum benefit. They must also be safeguarded against damage, loss, fraud, and theft and must not be used for personal gain of any entity.

Principles


- Study and follow regulations of the Company and of its affiliates on the management of information technology and procurement, as well as data and asset usage guidelines. It is your duty to safeguard information of Contracting Parties, customers, and partners from infringement, or improper or unauthorized or unlawful use. Publicization of trade information or trade secrets constitutes a criminal offense according to the Criminal Code on trade secrets, including the law on computer-related crimes.


Guidelines


- Safeguard and prevent company assets from damage, loss, theft, or misappropriation or unlawful or immoral use. Also comply with security measures for confidential or nonpublic information for the sake of the business. Maintaining the standard of protection and proper use of information.
- Use of company assets to achieve business goals of the Company. Do not use assets of the Company for your own interests. Your use of company assets must neither affect the interests of the Company or your performance.
- Identify and safeguard information, documents, evidence, or any assets of the Company that must be kept confidential, such as trade information, manufacturing cost, manufacturing formula, pricing formula, software, technical methodologies, manufacturing process, business administration, customer roster, advertising strategy, and personal information of Executive Officers and Employees


- Where it is necessary to use information of the Contracting Parties, customers, or partners, or other personal data, you must not infringe upon the rights of the owner of that information. Such information must be used within the scope of necessity and with great care. Always verify the accuracy of such information before use, unless it has already been made public.
- Information and access to information of the Company must be managed systematically to prevent unauthorized persons from using the information. Do not allow anyone to use your own or the Company's passwords for access information systems.
- Be cautious of information technology. Avoid misuse or unintentional disclosure, such as using a computer, speaking on the phone, writing E-Mails-by means of which information could be transmitted to unintended parties-including the transmission of confidential information to others whether intentionally or unintentionally, or acquisition of information in a manner contrary to the legal practice.
- Avoid violations of non-disclosure agreements, such as disclosing your employer's trade information to others, especially competitors, while working with the employer or leaving the job.
- Do not disclose information, financial projections, or forecast earnings or profit in each quarter as the date for disclosure to the Stock Exchange of Thailand nears. This may be understood as an attempt or incentive to affect stock prices.

Sample Questions and Answers

 **Question :** What should I do when the press asks about next quarter's profit when the quarterly financial statement hasn't been made public?

 **Answer :** You should decline giving such information. Pass it along to the central agency or the person tasked by the Company to disclose information of this nature to the public. Since next quarter's profit, which has yet to be disclosed as part of the quarterly financial statement, is considered insider information, which may affect stock prices, it is, therefore, to remain nonpublic for the time being.

 **Question :** When an incident, accident, or damage occurs on the premises of a plant, what should I do?

 **Answer :** Immediately notify your supervisor or the person in charge of the function. Do not disseminate information, images, or audio of the event through any medium, especially social media, without permission because it could affect the image of the Company or an affiliate of the Company. It is, therefore, the duty of the authorized person to disclose such information to outsiders.

Examples of Relevant Laws and Regulations

- Company regulations on information technology management B.E. 2557
- Company regulations on procurement B.E. 2559
- Corporate Governance Handbook
- Code of Conduct

Examples of Additional Resources

- The Stock Exchange of Thailand, Disclosure
http://www.set.or.th/en/regulations/supervision/listed_disclosure_p5.html
- The Office of the Securities and Exchange Commission
<http://www.cgthailand.org/TH/Regulation/SET/Pages/SETrule.aspx>

8. Responsibility towards the Environment, Health, and Safety



Policy

“Directors, Executive Officers, and Employees of the IRPC Group must conduct business with responsibility towards society, communities, and the environment, taking into account the health and safety of Employees and Stakeholders. The IRPC Group regularly instills an awareness of this matter among Employees, Executive Officers, and Stakeholders.”

The Company is committed to the preservation of the environment, health, and safety throughout all of the processes involved in conducting its business, starting from conducting an environmental impact assessment (EIA) before investing in a project or business. The proper technology is used to minimize environmental impact from operation. Furthermore, the Company also instills an awareness of and responsibility for the environment, health, and safety among all Employees, including others who are involved in its business operations.

Principles


- All processes of the Company must comply with Law and Regulations, standards, and guidelines for the preservation of the environment, health, and safety, including cooperation in the implementation of international agreements to prevent or minimize potential impact.


- Study the operational manual and emergency plans prior to entering into any operating area and participate in training for emergency plans.

Guidelines

- Assess environmental, health, and safety risks and impact before designing and developing a process, project, or product to plan or devise appropriate measures. The Company places great importance on the environment and the safety of the community, including complaints that may occur, to continuously resolve problems and implement sustainable preventive measures.
- Manage and control the manufacturing process, equipment, and machinery to ensure that they do not pollute the environment, or affect the health and safety of Employees, communities, or persons involved. Should you notice an unsafe working condition or situation, stop and report it to the person in charge immediately to remedy the situation before proceeding further.
- Provide environmental, health, and safety assistance to society and communities. Also cooperate with public and private agencies in cases of natural disasters, such as floods and hurricanes, as necessary and appropriate.
- Promote and instill a sense of environmental, health, and safety awareness among Stakeholders through various channels as you see appropriate, such as attending seminars or participation in activities.

Sample Questions and Answers

 **Question :** People in the nearby community complained that sewage with strong odor has leaked from the manufacturing plant into a stream near the community. What should the Company do?

 **Answer :** As soon as the complaint is received, the person in charge should investigate the matter as soon as possible. When a cause is found, provide a fix or prevent sewage water from reaching the stream. Also run a check on the said stream to assess impact and report it to the supervisor. Should the culprit be traced back to the Company, carry out pollution management and notify the community of our progress.

Examples of Relevant Laws and Regulations

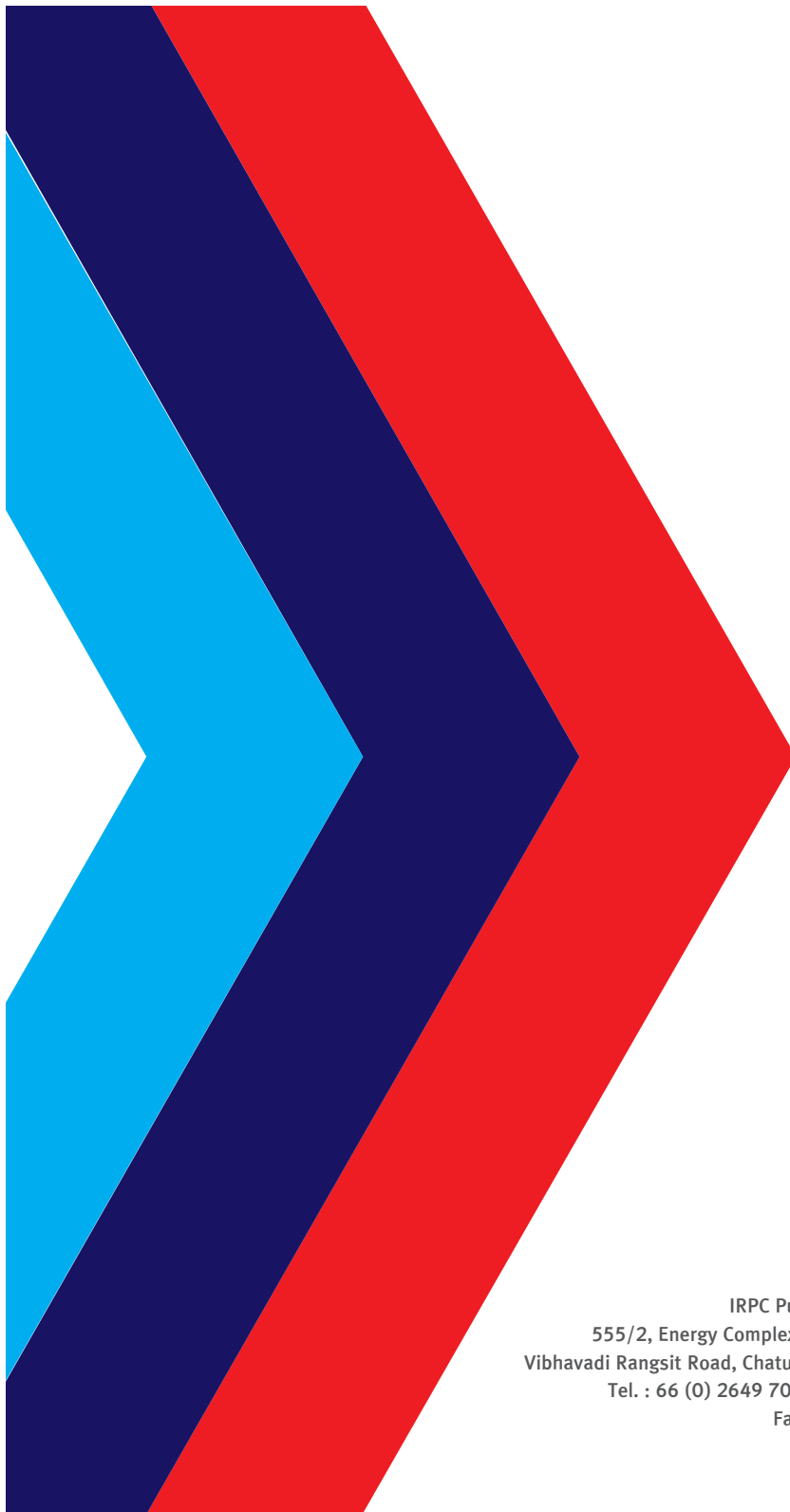
- Occupational Health, Safety, and Environment Act B.E. 2554
- Enhancement and Conservation of National Environment Quality Act B.E. 2535
- Plants Act B.E. 2535
- Public Health Act B.E. 2535
- Hazardous Substances Act B.E. 2535
- IRCP Group's Sustainability Policy
- QSSHE Policy
- Corporate Governance Handbook
- Code of Conduct

Examples of Additional Resources

- Environmental Impact Evaluation Bureau
<http://www.onep.go.th/eia/>
- Department of Industrial Works
<http://www.diw.go.th/hawk/content.php?mode=laws>
- Industrial Estate Authority of Thailand
<http://www.ieat.go.th/investment/about-industrial-estates/industrial-estates-in-thailand>
- Ministry of Natural Resources and the Environment
<http://www.mnre.go.th/main.php?filename=index>
- Ministry of Energy
<http://energy.go.th/2015/>



IRPC Public Company Limited



IRPC Public Company Limited
555/2, Energy Complex, Building B, 6th Floor,
Vibhavadi Rangsit Road, Chatuchak, Bangkok 10900
Tel. : 66 (0) 2649 7000, 66 (0) 2649 7777
Fax. : 66 (0) 2649 7001