

Announcement of Airports of Thailand Public Company Limited on Anti-Corruption Policies

Airports of Thailand Public Company Limited (AOT) is strictly committed to enhancing the organization's good corporate governance and organizational excellence to an international standard level. This is to ensure greater trust and confidence for all shareholders, investors, and stakeholders along with building corporate culture in preventing and eliminating corruptions and illegal practices in a responsive and decisive manner. AOT adheres to the operating framework of the "Thai Private Sector Collective Action Against Corruption (CAC)" to proclaim its determined intention to fight against illegal conducts of all types in both direct and indirect manners. The organization has encouraged its committee members, executives and employees to realize the significance of these anti-corruption policies and to put them into practice effectively.

Definitions

"Fraud" means intentional acts to exploit unlawful benefits for oneself or others such as family members, relatives, friends and just to name a few. Such acts are embezzlement, report manipulation and corruption.

"Corruption" means misuse of authority to take any action in order to obtain undue benefits for the organization, themselves or others. Corruption covers giving and/or accepting bribes, conflicts of interest, threats and/or claims for benefits and paying for convenience.

"Donations Contributions" means the donation of money or other necessities or any benefits offered to persons or external organizations including charitable contributions.

"Sponsorships" means giving and receiving financial support or items or any other forms of support for the purpose of branding business or reputation of the sponsorship's owner.

"Facilitation Payment" means small expenses paid informally to government officers which the giver does not intend to give such expenses to induce government officers to act, not to act or to delay other acts against their duties. Such expenses are paid to assure that the government officers will follow the process or encourage a rapid process. The process is not subject to the discretion of the government officer and is a rightful act of that government officer, including the rights that should be obtained by law, such as applying for a license, requesting certificates and receiving public services, and just to name a few.

"Political Contribution" means financial support, item support and/or participating in activities to support political parties, politicians or politically related persons, either directly and indirectly, on behalf of the company for business competitive advantages. This causes the company to lose political neutrality and/or has been damaged by being involved in such activities. However, this does not include employees participating in political activities according to the principle of freedom.

“Gifts and Hospitality” means the expenses with financial value paid for obtaining an item or service, which shall include any form of offer used to substitute cash and exchange for product or service.

“Conflict of Interest” means conflicts of personal interests of employees, including relatives and family members, with the benefits of AOT, either directly or indirectly.

“Revolving Door” means public sector individuals working in the private sector or private sector individuals working in relation to policies in the public sector, causing the risk of fraud and corruption in terms of conflicts of interest between the individuals with roles in both organizations. This action may cause officers of such organizations to perform their supervisory duties in a biased manner or individuals in the private sector try to push for government policies that benefit their organizations.

“AOT Personnel” means the Board of Directors, president, executives, employees and staff members belonging to the AOT.

Duties and Responsibilities

1. AOT Board of Directors

- Set policies and supervise that there is an effective system to support anti-corruption to ensure that the management recognizes and gives importance to anti-corruption and instills it as the organization's values.
- Review anti-corruption policies and practice guidelines on a yearly basis.
- Pursue all anti-corruption and bribery policies and apply serious forms of penalty for violations.

2. Audit Committee

- Oversee and examine the appropriateness and adequacy of policies and practice guidelines on anti-corruption.
- Oversee the internal control, preparation of financial reports and other processes related to anti-corruption measures, and compliance with the anti-corruption policies.
- Review and ensure that financial and accounting reporting systems, internal control systems, internal audit systems, and risk management system are up to international standards, concise, appropriate, up-to-date and efficient.
- Review risk assessment and give advice to the AOT Board of Directors regarding necessary actions required for risk mitigation which shall be further implemented by the executives.
- Regularly report the internal audit results of AOT's anti-corruption measures to the AOT Board of Directors and give recommendations and instructions to the AOT Board of Directors and executives.

3. Good Corporate Governance Committee

- Determine monitoring guidelines and implementation towards anti-corruption of AOT.
- Determine and review anti-corruption policies and report to the AOT Board of Directors.

4. Risk Management Committee

- Oversee and support the implementation of risk management towards anti-corruption by sufficiently and appropriately developing effective risk assessment and reviewing anti-corruption measures.

5. President and Executives of AOT

- Oversee and encourage all employees and staff members of AOT to seriously and consistently conduct in compliance with anti-corruption policies.
- Determine effective risk assessment on anti-corruption for the implementation processes that may lead to corruption.
- Establish a process to promote and support anti-corruption policies and communicate the said policies to AOT employees and stakeholders.
- Review the appropriateness of developed measures and procedures to comply with changes of business, rules, regulations, and legal provisions.

Practice Guidelines

All of the AOT personnel must perform in compliance with the following practice guidelines:

1. All of the personnel strictly pursue the anti-corruption policies and never get involved in all types of corruption, either directly or indirectly.
2. It is strictly prohibited for AOT personnel to call for, perform or agree to any type of corruption, directly or indirectly, in order to seek benefits in an illegal manner for oneself, family members, friends or others.
3. Any of the AOT's charitable contribution or sponsorship shall be practiced with reliable evidence or reference in accordance with the AOT's rules and regulations, where the receiver of the charitable contribution or sponsorship shall be required to report the performance outcome to be met with the request's objective.
4. The organization has a policy not to accept of facilitation payments. However, legitimate expedited processing is acceptable as long as it is open to everyone or only possible within the limits of the law.
5. The organization places importance on being politically neutral by not supporting and assisting any political actions. The company has no guidelines to provide political assistance to political parties, politicians or politically related persons, either directly or indirectly, to obtain special privileges or legitimate undue benefits or business competitive advantages.
6. The acceptance and offer of gifts, properties, or any benefits, which shall include all types of hospitality expenses and other related expenses, shall be practiced for business or traditional purposes only. Each acceptance and offer shall not exceed 3,000 Baht (Three Thousand Baht Only).
In addition, it is strictly prohibited for all AOT personnel to accept any gifts, properties, or any benefits specified in the first paragraph if such acceptance shall be deemed to be the cause of any certain impact on the duty-based determination or operations of the organization.
7. The organization has provided regular audit processes of systems and procedures for distributing and marketing sections, including supply procurement and contract signing tasks. It is also included risk assessment towards corruption and its appropriate solutions.

8. The organization has strategically provided effective methods in human resources management and development covering the recruitment or personnel selection, promotion, training programs, evaluation, and offers of remuneration for outstanding performance reflecting the strong intention upon the anti-corruption policies.
9. The organization shall not demote any position, apply harsh penalty, or provide negative feedback to its employees who refuse to perform any corrupted practices, even though they affect the AOT's business opportunity. Additionally, the effective communication process has been applied for clear perception on anti-corruption policies.
10. The organization has arranged an orientation course for new employees, which includes the consecutive development of communication and training programs so as to provide AOT personnel with substantial understanding towards anti-corruption policies and its penalties in case of policies' abstention.
11. The organization has arranged an internal control system with effective document storage and record management procedure for prompt audit based on accuracy and appropriateness of financial report and other information as well as effective process is provided to ensure that all data are kept on record and no transaction remains unexplainable or on truthful.
12. The organization has developed effective internal audit for the control of financial procedures and data storage which reflect the effectiveness of its anti-corruption policies, while ensuring greater confidence in the inspection of its financial documents and information.
13. The organization has fostered efficient communication strategies of the anti-corruption policies for its affiliates, subsidiaries, agents, stakeholders, outside organization, and public representatives to make use of the anti-corruption policies effectively and practically.
14. The organization has arranged effective communication channels for the filing of clues and the determination of penalties for any AOT personnel who appears to be involved in any corrupted action. The organization shall proceed with effective investigation and strictly apply appropriate penalty in accordance with the organization's required rules, regulations and related laws.
15. The organization shall always provide fairness and protection for its personnel and other third parties who have clues or evidences of any corrupted action while ensuring that they can confidently access a certain communication channel and information, particularly when they require suggestions on the anti-corruption policies.
16. The organization has rules and guidelines for conflicts of interest in order to perform one's responsible duties in a fair manner, not biased in favor of one's own interests or others. There is a standardized control system by adhering to the principles of good governance, transparency and verifiability for the benefits of good management and compliance with the rules and guidelines on conflicts of interest.
17. The organization discloses names and backgrounds of persons who are government officers and former government officers who have been appointed as consultants/ directors/ executives of the company. This is for transparency and for the public to be informed and verifiable.
18. The organization operates in accordance with the risk management manual on fraud to ensure that the prescribed actions are performed completely and efficiently. The risk assessment on fraud covers affiliated companies and subsidiaries of AOT as well.

19. The AOT President shall be responsible for following up on performance review related to the anti-corruption policies to be acknowledged by the Audit Committee, Good Corporate Governance Committee and AOT Board of Directors regularly at least once a year.
20. In case the Office of Audit finds suspicious evidence of corruption of AOT personnel, the matter must be immediately reported by the Office of Audit to the Audit Committee and AOT President in order to be further reported to AOT Board of Directors accordingly.
21. The organization has strategically developed review processes on the anti-corruption policies and its guidelines on a yearly basis to comply with the changes of business situation, rules, regulations, principles and enactment of laws. The review shall be approved by the AOT Board of Directors.

Penalties

AOT personnel who violates against this anti-corruption policies, direct or indirect actions, shall be considered by the disciplinary regulations of AOT and by legal practices in case of being legal infraction.

Announced as of 13 February 2023



(Mr. Sarawut Songsivilai)
Chairman of AOT Board of Directors