

Policy No. 055 / 2567

Anti-Bribery and Corruption Policy

CIMB Thai Bank Public Company Limited

Board Risk & Compliance Committee Meeting No. 10/2024 dated 15 Oct 2024 has approved the revised Anti-Bribery and Corruption Policy version 9 of CIMB Thai Bank Public Company Limited. Therefore, the Anti-Bribery and Corruption Policy version 8 which was in effective since 1 October 2022 shall be terminated and replaced by the revised policy.

This Anti-Bribery and Corruption Policy is a reference document of CIMB Thai on policy matters relating to the prevention of bribery and corruption. This policy aims to set out responsibilities of CIMB Thai's employees and associated persons working for and on behalf of CIMB Thai, in observing and upholding its position on anti-bribery and corruption; and to provide information and guidance to those working for and on behalf of CIMB Thai, as described in the above, on how to recognise, raise concern and deal with bribery and corruption issues.

All staff of CIMB Thai Financial Group are required to comply with the contents of this Policy.

This Anti-Bribery and Corruption Policy version 9 is effective from 1 November 2024 onwards.

(Mr. Paul Wong Chee Kin)

President and Chief Executive Officer

Proprietary/Internal Use Only

ANTI-BRIBERY AND CORRUPTION POLICY

Version 9.0

Proprietary/Internal Use Only

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ABBREVIATION

Abbreviation / Terminology	Description
ABC	Anti-Bribery and Corruption
Agent	Any person employed by or acting for another, and includes an officer of a public body or an officer serving in or under any public body, a trustee, an administrator or executor of the estate of a deceased person, a subcontractor, and any person employed by or acting for such trustee, administrator or executor, or subcontractor.
Associated person	Associated persons refers to the directors, partners and employees of CIMB Thai and persons who perform service for and on behalf of CIMB Thai (e.g. vendors, suppliers, service providers, agents, consultants, business partners). The question as to whether a person performs services for or on behalf of CIMB Thai shall be determined by reference to all the relevant circumstances and not merely by reference to the nature of the relationship between him and CIMB Thai.
Business associate	Business associate includes, without limitation, clients, customers, business partners, joint venture partners, vendors, suppliers, service providers, agents, consultants, business partners.
Immediate family members	Employee's spouse, parents, siblings, children, and their respective spouses.
Other external parties	Any business dealings with CIMB Thai (potential business dealing between CIMB Thai and external parties)
B&C	Bribery & Corruption
HOC	Head of Compliance
CIMB	CIMB Group Holdings Berhad and its group of companies (within or outside of Malaysia)
CIMB Thai	CIMB Thai Bank Public Company Limited.
Employee or staff	Includes permanent, contract, trainees, interns, seconded employee, casual, part-time, agency staffs or temporary employees with a contract of service

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Abbreviation / Terminology	Description
CEO	Chief Executive Officer
MC	Management Committee
HR	Human Resource
CA	Corporate Assurance
HOD	Head of Division, Department and including Head of Subsidiaries

INTERPRETATION

Unless otherwise expressed to the contrary, words imparting the singular shall include the plural and vice versa and words imparting the masculine gender shall include the feminine and neuter genders and vice versa.

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1. POLICY GOVERNANCE SUMMARY

1.1 PURPOSE

The CIMB Thai Anti-Bribery and Corruption Policy (hereinafter referred to as “this Policy”) is a reference document of CIMB Thai on policy matters relating to the prevention of bribery and corruption.

1.2 RISK ADDRESSED (LEVEL 1/ 2/ 3) (MAIN RISK/ SUB-RISK/ SPECIFIC RISK)

This section is only applicable for Group policies and not applicable for business specific policies.

Main Risk (Level 1)	Sub-Risk (Level 2)	Specific Risk (Level 3)
Operational Risk	Improper Business and or Market Practice	Bribery and Corruption Risk

1.3 SCOPE

- This Policy applies to all Business and Functions across CIMB Thai and Subsidiary Companies.
- This Policy applies to all associated persons of CIMB Thai which includes CIMB Thai's directors, partners, employees, consultants, contractors, agency employees, volunteers, agents, sponsors, business partners or any other persons associated with CIMB Thai, no matter where they are located, within or outside of Thailand.
- This Policy shall also extend to immediate family members who are defined as the employee's spouse, parents, siblings, children, and their respective spouses.

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- (d) For each employee, compliance with this Policy constitutes conditions of employment, and for each associated person, constitutes conditions of providing services to CIMB Thai. Each such person agrees to be bound by the provisions of this Policy upon notification of the most recent copy being made available to them.

1.4 DISPENSATION

A dispensation is required for:

Any division within CIMB Thai where:

- (a) A division/department proposes to implement less stringent requirements than set out in this Policy;
- (b) A division/department proposes to implement more stringent requirements which are not aligned with the requirements in this Policy; or
- (c) A division/department within CIMB Thai proposes not to comply with a requirement in this Policy in unforeseen or emergency situations.

Applications for any dispensation will be evaluated by the Head of Legal and Compliance or his/her authorised delegates AND would be subject to the fulfilment of the relevant requirements including satisfaction of the justifications and strength of the mitigating controls provided by the division/department. The outcome of the evaluation shall be documented. Dispensations from requirements to comply with this Policy may be granted in exceptional circumstances only.

1.5 GOVERNANCE

All material changes in this Policy must be endorsed and approved by the following:

- (a) Board Risk and Compliance Committee (BRCC)
- (b) Risk Management Committee (RMC)

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All non-material changes in this Policy shall be approved by Head of Department / Division

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2. POLICY

2.1 OBJECTIVE

To set out responsibilities of CIMB Thai's employees and associated persons working for and on behalf of CIMB Thai, in observing and upholding its position on anti-bribery and corruption; and to provide information and guidance to those working for and on behalf of CIMB Thai, as described in the above, on how to recognise, raise concern and deal with bribery and corruption issues.

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2.2 POLICY STATEMENT

2.2.1 KEY PRINCIPLES

- (a) All business activities and operations of CIMB Thai are to be conducted in an honest and ethical manner, with high standards of integrity.
- (b) CIMB Thai takes a zero-tolerance approach towards all forms of bribery and corruption and is committed to acting professionally, fairly and with integrity in all business dealings and relationships in all jurisdictions in which it operates. CIMB Thai is committed to implementing and enforcing effective measures to counter bribery and corruption which are punishable offences in accordance with the anti-bribery and corruption laws.
- (c) CIMB Thai, its employees and associated persons will comply with all laws relating to anti-bribery and corruption in their respective jurisdictions of operations and business. This Policy extends across all of CIMB Thai's business dealings and in all jurisdictions in which CIMB Thai operates.
- (d) CIMB Thai does not prohibit reasonable, proportionate and bona fide hospitality and promotional or other business expenditure which seeks to improve the image of the CIMB Thai, to better present CIMB Thai's products and services or to establish cordial relations which are recognised as an established and important part of doing business.
- (e) CIMB Thai, its employees and associated persons shall not, whether directly or indirectly, offer, promise or give a bribe to anyone, and shall not request, agree to accept, receive, solicit or take a bribe from anyone. Bribery is a crime and penalties can be imposed, including prison sentences and large financial penalties.
- (f) CIMB Thai adopts a strict "Policy and Procedure on Giving and Acceptance of Gifts and Entertainment". All employees and their immediate family members are NOT allowed to accept, offer or give personal gifts, hospitality, entertainment, travel, facilitation payments/kickbacks and political contribution from/to our customers or business associates. This is to avoid any situation of conflict of interest or appearance of such in

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our business dealings with our customers or business associates. Any exceptions must strictly adhere to this Policy and any approved guidelines.

- (g) CIMB Thai must ensure all sponsorships and charitable contributions/donations are NOT in exchange for inappropriate advantage or benefit, NOT used to facilitate and conceal acts of bribery, and it will not result in any conflict of interest.
- (h) CIMB Thai employees and associated persons should avoid or deal appropriately with situations in which personal interest could conflict obligations and duties which could result in actual or potential bribery and corruption risk or gives the perception of such. CIMB Thai employees and associated persons MUST NOT use their position, official working hours, CIMB Thai's resources and assets for personal gain.
- (i) CIMB Thai's recruitment, training, performance evaluation, remuneration, recognition and promotion for its employees shall be designed and regularly updated to recognize integrity.
- (j) CIMB Thai conducts due diligence on every employee, business associates, associated person, business dealing, project and business activity, in particular where there is potentially significant exposure to bribery and corruption risk.
- (k) CIMB Thai encourages all employees, business associates and associated persons to report any suspected, attempted or actual bribery and corruption cases, and prohibits retaliation against those making reports in good faith. CIMB Thai also provides assurance that no employee, business associates or associated person shall be penalised or suffer any adverse consequences in retaliation for refusing to pay or receive bribes or participate in other illicit behaviour.

2.2.2 DEFINITION OF BRIBERY AND CORRUPTION

- (a) Bribery refers to the act of offering, giving, promising, asking, agreeing, receiving, accepting or soliciting something of value or of an advantage so to induce or influence an action or decision that the recipient would otherwise not offer. A bribe refers to any inducement, reward or object/item of value offered to another individual in order to gain or retain commercial, contractual, regulatory or personal business or

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advantage which constitutes “improper performance”. Bribery is not limited to the act of offering a bribe. If an individual is on the receiving end of a bribe and they accept it, they are also breaking the law.

- (b) Improper performance means performance which amounts to a breach of an expectation that a person will act in good faith, impartially, or in accordance with a position of trust. Offences apply to bribery relating to any function of a public nature, connected with a business, performed in the course of a person’s employment or performed on behalf of a company or another body of persons. Therefore, bribery in both the public and private sectors is covered.
- (c) Corruption is the abuse of entrusted power or position to obtain a personal gain or benefit. It refers to the act of soliciting, giving, promising to give, offering, accepting or receiving gratification, directly or indirectly, to/from a person in authority either in the form of money, services, favours, discount, wage, reward, vote, bonus, positions or valuable goods as an inducement or reward to or not to do an act in relation to the person’s principal affairs or function.
- (d) Gratification refers to ‘something of value’ which includes, but not limited to money, donation, gift, loan, fee, reward, valuable security, information, property or interest in property, contract of employment or services, payment or release of any loan, obligation or other liability, any valuable consideration of any kind, any other service or favour of any description, offer, undertaking or promise, rebate, discount, and agreement to give employment or render services in any capacity. Bribery and corruption (collectively “corrupt gratification”) are illegal. Employees and/or associated persons must not engage in any form of corrupt gratification, whether it be directly or through a third party (such as an agent or distributor). They must not bribe a foreign public official anywhere in the world. They must not accept bribes in any degree and if they are uncertain about whether something is a bribe, a gift or act of hospitality, they must seek further advice from their HOD.
- (e) Employment of government official (revolving door) refers to engaging a person who is or has ever been a government official, namely civil servant; political position holder; government official; official of local government organization who holds a position or earns fixed salary; employee or person working in a state enterprise or government agency; local administration executive and member of local council who

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does not hold a political position; officer pursuant to the local administration law, including a member of committee or sub-committee, advisor and employee of a government unit, state enterprise or government agency; and person or group of persons who exercises or is designated to exercise the government administration power to perform any particular act as allowed by the law, regardless of whether it is established by the government as a government agency, state enterprise or other types of business.

The following represent examples of actions constituting Bribery / Corruption.

i. Offering a bribe

You offer potential client tickets to a major sporting event, but only if they agree to do business with CIMB Thai. This would be an offence as you are making the offer to secure a commercial and contractual appointment. CIMB Thai may also be found to have committed an offence because the offer has been made to obtain business for it. It may also be an offence for the potential client to accept your offer.

ii. Receiving a bribe

A supplier gives your nephew a job but makes it clear that in return they (the supplier) expect you to use your influence in CIMB Thai to ensure CIMB Thai continue to do business with them. It is an offence for a supplier to make such an offer. It would be an offence for you to accept the offer as you would be doing so to gain a personal advantage.

iii. Bribing a foreign official

You arrange for the business to make an additional payment to a foreign official to speed up an administrative process, such as clearing CIMB Thai's goods through customs. The offence of bribing a foreign official has been committed as soon as the offer is made. This is because it is made to gain a business advantage for CIMB Thai. CIMB Thai may also be found to have committed an offence.

iv. Corporate bribery offence

Failing to prevent bribery committed by associated persons on behalf of the company.

v. Kickbacks from vendor

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A vendor agrees to give some kickbacks during the procurement process. This is done to ensure that the vendor continues to get the contract in CIMB Thai. It is an offence to receive any kickback from any vendor as stated in the Group Procurement policy. The vendor also violates the Vendor Code of Conduct which expressly prohibits any form of corruption / bribery to influence CIMB Thai's decision making.

vi. Bribing using entertainment

You organize a lavish banquet dinner with entertainment to the board of directors of a potential corporate client. The intention is to get the client to agree to do business with CIMB Thai. This would be an offence as the event was organized in order to induce the potential client to establish business relations with the Group. It is also an offence as the intention is to secure a commercial and contractual agreement and this would be deemed a corporate liability offence.

2.2.3 POLICY AND PROCEDURE ON GIVING AND ACCEPTANCE OF GIFTS AND ENTERTAINMENT

- (a) CIMB Thai adopts a strict "POLICY AND PROCEDURE ON GIVING AND ACCEPTANCE OF GIFTS AND ENTERTAINMENT". All employees and their immediate family members are NOT allowed to accept personal gifts from CIMB Thai customers or business associates. This is to avoid any situation of conflict of interest or appearance of such in our business dealings with our customers or business associates. The same will also apply in the giving of gifts, and any exceptions must strictly adhere to this Policy and any approved guidelines.
- (b) CIMB Thai requires employees to abide by this Policy to avoid conflict of interest or the appearance of a conflict of interest for either party in on-going or potential business dealings between CIMB Thai and external parties as a gift can be seen as a bribe that may tarnish CIMB Thai's reputation or be in violation of anti-bribery and corruption laws.

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- (c) It is the responsibility of all employees to inform external parties involved in any business dealings with CIMB Thai that the Company practices “POLICY AND PROCEDURE ON GIVING AND ACCEPTANCE OF GIFTS AND ENTERTAINMENT” and to request the external party’s understanding for and adherence with this Policy.
- (d) In deciding on whether to receive or accept a gift, consideration must always be given to the following key guiding principles:
- i. Value of the gift;
 - ii. Purpose for the giving/receipt of the gift;
 - iii. Nature of the gift;
 - iv. Transparency in the giving/receipt of the gift;
 - v. Perception in the giving/receipt of the gift.

2.2.4 RECEIPT/GIVING OF GIFTS

- (a) The general rule of CIMB Thai in receipt of gifts is to refuse or return the gifts with explanations to be provided to the giver on the non-acceptance of the gifts. However, CIMB Thai recognises that the exchange of business courtesies, such as modest gifts and hospitality (for example meals, invitation to attend events) particularly during festive periods is customary and legitimate to create goodwill, and/or strengthen business and commercial relationship. Such courtesies are acceptable with the intended not to influence the decisions or in exchange with any returns. All employees shall exercise good judgement and ensure the acceptance of gift or entertainment will not result in a conflict of interest when seen in the context of their employment with the Bank.
- (b) Giving of Gifts - As a general rule, no gift is to be given except with the approval of the President and CEO or an MC members (including Head of Division who is a permanent invitee to the MC), where applicable.
- (c) Acceptance of the gift is allowed in the following cases:
- i. If refusing the gift may materially affect our business relationship with the giver and the value of the gift is nominal eg. THB 3000 or below

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- ii. Corporate Gifts, Festive Gifts, Congratulatory Gifts and Compassionate Gifts of nominal value, eg. THB 3000 or below is allowed according to Delegation Authority;
- iii. Exchange or giving of gifts during official events, signing ceremony, company visits, as a speaker or open public events;
- iv. Promotional items with the company logo with nominal value, e.g. (t-shirts, pens, diaries, calendars and other small promotional items) that are given out equally to members of the publics, delegates, customers, partners and key stakeholders attending events such as conference, exhibitions, trading, trade shows etc and deemed as part of the company's brand building or promotional activities.
- v. Free conferences or training courses where the other costs (e.g. transportation, accommodation, etc.) if any are paid by CIMB Thai;
- vi. Financial support / contributions given by CIMB for programmes, events or activities where CIMB will be able to advertise or showcase its products and / services either through the publications events, marketing collaterals or activities managed by the organisers, with joint recommendation of the relevant HOD and GBCD and which are eligible for tax deductions;
- vii. Financial support / contributions given to organisations or individuals based on CIMB Thai's corporate social responsibility framework / guidelines, including the making of a gift to charity or public organisations with joint recommendation of the relevant HOD and Corporate Communication Department;
- viii. Unless prohibited by law or policy of the recipient organisation, CIMB Thai may bear the cost of transportation, lodging or training/entrance fee of customers, business partners or others in connection with a visit to CIMB Thai's facility or event. The visit/event must be for a legitimate business purpose, e.g. on-site examination of facilities, products or services or training and provided the other party is allowed to reimburse such cost in accordance with its own internal policy if it wishes to do so. Exception is given to the CIMB staffs who are required to conduct site visits. The cost of such site visits are to be borne by customers as part of the business requirement e.g. executing market capital transaction, initial public offering or merger and acquisition transactions or equivalent business requirement.

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Employee are required to register all gifts in the Gift Register, gift receipt of more than THB 3000 must be approved by the MC members (including Head of Division who is a permanent invitee to the MC or Country Head, provided it is not expressly disallowed by this Policy.

(d) The giving or receipt of gifts shall not be allowed for CIMB Thai's employees and associated persons under the following circumstances:

- i. Any amount of cash or cash equivalent (eg. travelers' cheques, coupons, gift certificates or cash vouchers);
- ii. Purchase of gifts or financial support/contributions to companies, organisations or individuals for purpose of business networking, fostering relationships or showing hospitality where CIMB Thai will not be able to advertise or market the Bank's product and/or services unless it falls within item 2.2.4(c)(vii) above;
- iii. Where an actual or potential conflict of interest situation may arise, e.g. given whilst a bidding is in progress, the expectation of quid pro quo, or breach of any law, any form of gifts in exchange for an act for the benefit of the bank;
- iv. Soliciting of gifts from customers or business associates or vendors for CIMB Thai's functions, including via third parties.
- v. Sponsored trips, including site visits, organised by vendors or other business associates whether they are currently providing products and / or services to the Group or where there is a bidding in progress or otherwise. However, this may be allowed for the purpose of information gathering and all cost and expenses are paid by CIMB Thai. This shall also not apply to incentive trips organised by our brand partners whereby eligibility is based on certain mutually agreed prerequisites with CIMB Thai.
- vi. Any services or benefit of any kind irrespective of value that is offered in connection with CIMB Thai's businesses, e.g. using the services of our supplier/vendor for private consumption at a price that is not at arm's length or discount which exceeds those given to all CIMB Thai employee.

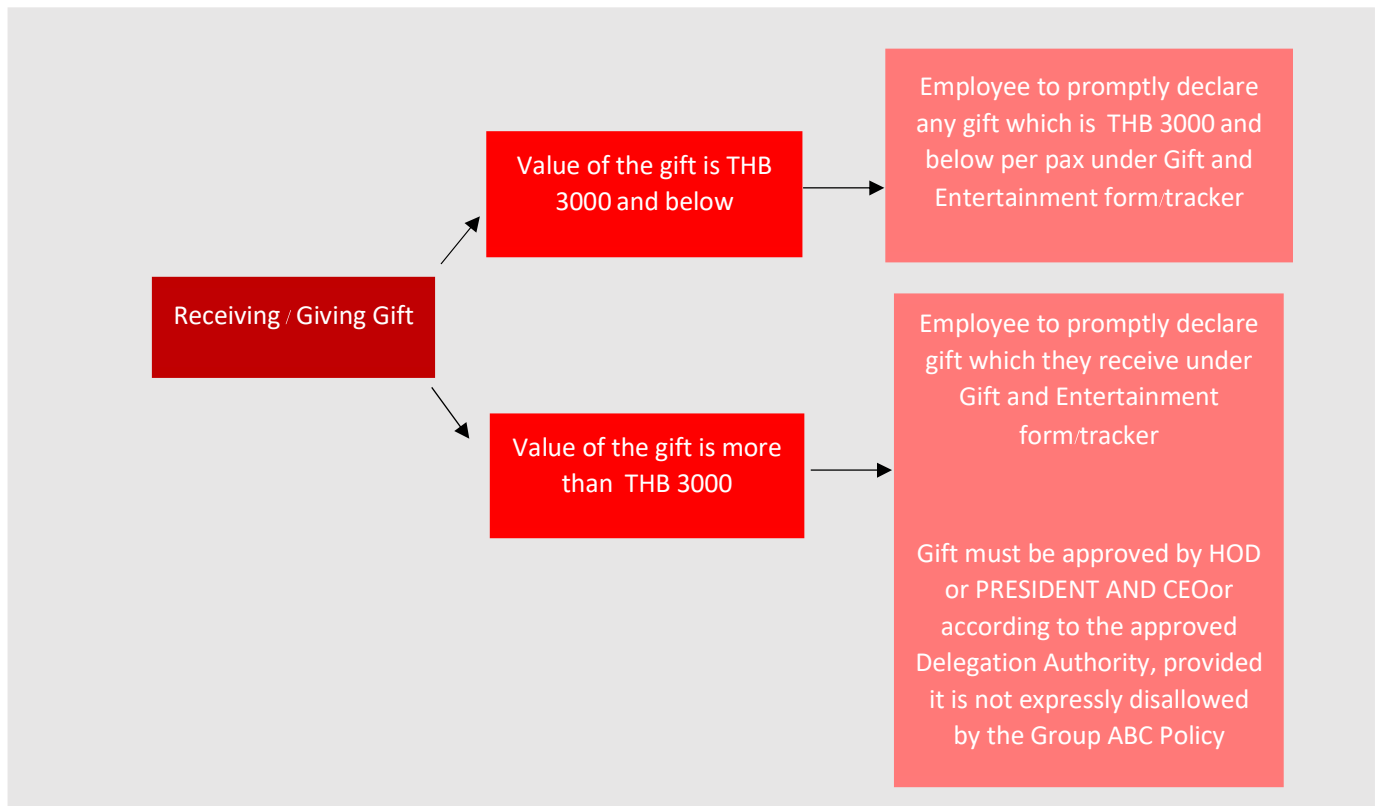
(e) In the event when the gifts could not be refused or returned, the following process shall be adhered:

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- i. Report to Head of Division (HOD) or President and CEO by completing and submitting the relevant gift registry form;
 - ii. Wherever possible, any gifts received should be donated to charity (e.g. welfare homes), the item being “auctioned” off and proceeds to be given to charity or to be given to the Corporate Communication Department and to be dealt with based on the Group’s corporate social responsibility framework / guidelines. Please liaise with Corporate Communication Department for the list of charitable organisations.
 - iii. For perishable items, e.g. cakes and flowers, this would be allowed to be retained in the branch / department but employees are not allowed to bring it home. The giver must also be notified to cease such practice.
 - iv. For any gift which does not fall within items 2.2.4(d) (ii) and (iii), the treatment of the gift shall be decided by the HOD or President and CEO. In coming to a decision on the treatment of the gift, the Head of Department/Division is expected to exercise proper care and judgement in each case and the following criteria must take into the consideration i.e the character of gifts, purpose, position of the person providing and receiving the gift, business context, reciprocity, cultural norms etc
 - v. The gift registry form is to be retained in the respective Department and kept in a proper file for review by Corporate Assurance Department during their audit.
 - vi. The gift registry form is also to be included as part of the Department’s self-testing process.
 - vii. The gift registry forms are to be retained for a period of at least seven (7) years.
- (f) Any exception to the above shall require the approval of the PRESIDENT AND CEO, with the recommendation from the Compliance Department
- (g) If in doubt, please refer to HOD who could also seek guidance Compliance Department.
- (h) Expenses that are chargeable or borne by the Group Islamic Banking Division, CIMB Islamic Bank Berhad and other department / entities related to Islamic businesses must be in compliance with Shariah principles.
- (i) No gift using CIMB’s money or resources shall be extended to CIMB’s employees, except where it falls within the staff welfare policy.

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(j) Flowchart for Receiving / Giving of Gifts



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2.2.5 RECEIPT/GIVING OF ENTERTAINMENT

- (a) As a general rule, the value of the meal is reasonable and appropriate in the context of the business occasion. In this respect, any entertainment of THB3000 and below per pax will be considered reasonable. This is allowed for the purpose of business networking, fostering relationships with external parties or showing hospitality and occur sparingly. This includes both receiving and giving of entertainment. All employees must promptly declare any entertainment above THB3000 which they receive. For the giving/receipt of entertainment above THB3000, the approval process as per approved Delegated Authority. Business entertainment means any activity where the primary purpose is to further business relations and includes such activities as meals, golf outings and sporting events.
- (b) Entertainment could be considered to be a bribe if it is given or received with the intention of influencing someone to act improperly, or as a reward for having acted improperly. The following factors should be considered in ensuring the entertainment given or received are appropriate:
- It is for bona fide purpose;
 - The activity will not create any obligation or expectation on the recipient;
 - The expenditure will not be seen as intended for or capable of achieving undue influence in relation to a business transaction;
 - The value and nature of the expenditure is not disproportionate to the occasion;
 - It is not overly frequent;
- The expense will be fully documented including purpose, approvals, attendees
- (c) The respective HOD must ensure all entertainment expenses are monitored and approved based on the DA policy and budget. It is acknowledged that the practice of business entertainment varies between various business segments, and what may seem acceptable in one division but may not be in another. The respective Division/Business units are required to assess the threshold of THB3000, where any deviation/dispensation is required to be approved by Compliance Department
- (d) All entertainment claims must be submitted by highest job grade staff from CIMB representatives who attended the event or involved in the entertainment. The following details must be provided with the submission of entertainment claims:
- Number of pax during the entertainment

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- ii. Names of CIMB and non-CIMB representatives
- iii. Relationship with the entertainment recipients e.g., potential customer / existing customer / panel solicitors etc.
- iv. Purpose of entertainment

Any submission of entertainment claim without the above information will be deemed as non-compliance with this policy.

Submission by non-highest job grade staff who attended the event or involved in the entertainment, in YODA for entertainment claim is allowed if such claim is routed to the Approver who is not involved in the entertainment.

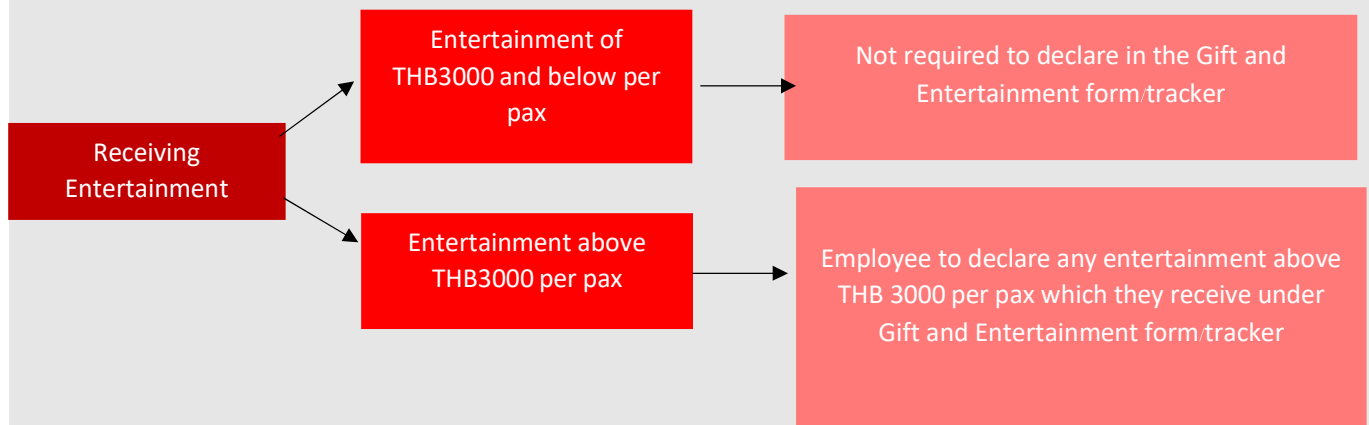
For illustrations:

1. *2 Relationship Managers and the Branch Manager had lunch/dinner with a client. Branch Manager as a highest ranking officer who attended the event or involved in the entertainment. to submit the entertainment claim with the above information.*
 2. *Events was organised by business segment and attended by GEXCO members, the entertainment claim to be submitted by the Head of business segment/organising department.*
- (e) Proper care and judgment must be exercised when providing entertainment to third parties, especially public officials, or receiving entertainment, to ensure compliance with local anti-bribery and corruption laws.
 - (f) Hosting and attending corporate events as part of business networking is allowed, subject to the factors stated above, where applicable
 - (g) However, the following shall not be allowed:
 - i. Where an actual or potential conflict of interest situation may arise, e.g. given whilst a bidding is in progress, the expectation of quid pro quo, or breach of any law.
 - (h) Expenses that are chargeable or borne by the Group Islamic Banking Division, CIMB Islamic Bank Berhad and other department / entities related to Islamic businesses must be in compliance with Shariah principles.
 - (i) If in doubt, please refer to HOD or President and PRESIDENT AND CEO who could also seek guidance from the Compliance Department

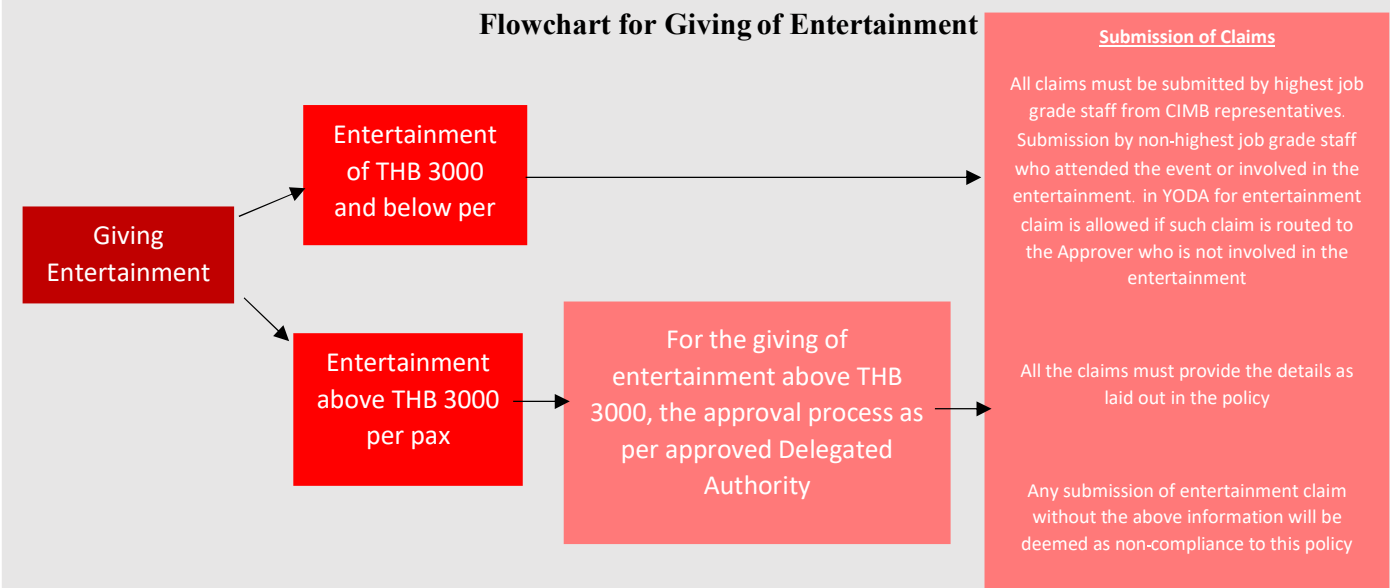
The entertainment registry forms are to be retained for a period of at least seven (7) years.

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Flowchart for Receiving of Entertainment



Flowchart for Giving of Entertainment



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2.2.6 CONFLICT OF INTEREST

- (a) Conflicts of interest arise in situations where there is a personal interest that might be considered to interfere with the person's objectivity or function when performing duties or exercising judgment on behalf of CIMB Thai, whether it benefits themselves or their closely related persons. A conflict of interest may give rise to acts of corruption, where a person does abuse his/her position for personal gain.
- (b) CIMB Thai employees and associated persons should avoid or deal appropriately with situations in which personal interest could conflict obligations and duties which could result in actual or potential bribery and corruption risk or gives the perception of such. CIMB Thai employees and associated persons MUST NOT use their position, official working hours, CIMB Thai's resources and assets for personal gain.
- (c) All CIMB Thai employees and associated persons must disclose promptly any situation presenting an actual, potential or perceived conflict of interest, and must obtain written approval of their respected heads of companies before undertaking activities which may give rise to a conflict of interest.
- (d) All CIMB Thai's employees and associated persons must declare their conflict of interest, both on a scheduled basis, and ad hoc basis as soon as they arise.

2.2.7 FACILITATION PAYMENTS AND KICKBACKS

- (a) CIMB Thai does not make, and will not accept facilitation payments or "kickbacks" of any kind by any of its employees and associated persons. Facilitation payments are typically small, unofficial payments made to secure or expedite a routine government action by a government official.
- (b) In tendering for publicly funded contracts, some governments may often permit or require those tendering to offer some kind of additional investment in the local economy. For the avoidance of doubt, such arrangement will not form part of bribing a foreign public official provided that a prior approval is received from the respective HOD.

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- (c) If CIMB Thai's employees or associated persons are asked to make a payment under this section (2.2.8) on CIMB Thai's behalf, he should always be mindful of what the payment is for and whether the amount requested is proportionate to the goods or services provided. He should always ask for a receipt which details the reason for the payment and to ensure that the payment has been recorded. If he has any suspicions, concerns or queries regarding a payment, he must raise these with his respective HOD and the Compliance Department as soon as possible.
- (d) Kickbacks are typically payments made in return for a business favour or advantage. All CIMB Thai's employees and associated persons must avoid any activity that might lead to, or suggest, that a facilitation payment or kickback will be made or accepted by CIMB Thai.
- (e) Emergency Exceptions –There are certain situation or circumstances where employee has reason to believe that his or her own or other's life, health or property could be in danger, the restriction on facilitation payment and bribery shall not apply. If such payments are made, the employee must immediately report to the Head of Department/Division and IGU.

For illustrations:

Employee who is on business trip is required to pay an extra "Processing Fees" to depart from the country. Such payment is normally made with no official receipts being issued. The employee must report the incident as soon as possible as per required under (e)

2.2.8 SPONSORSHIP

- (a) Subject to section 2.2.5, the Corporate Communication Department will be the custodian of approvals for all sponsorship requests with joint recommendation of the respective HOD, as provided in the Group Marketing Communications Policy.
- (b) The requesting HOD must conduct the necessary due diligence, including the purpose, identity of the recipients, prior to submission of any recommendation of sponsorship request to the Corporate Communication Department. Notwithstanding the submission of the recommendation to the Corporate Communication Department, the requesting HOD will remain to be accountable for the request.

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- (c) All sponsorships given must be justified, reasonable in value and frequency and not in exchange for inappropriate advantage or benefit and that it will not result in any conflict of interest. It must also not be used to facilitate and conceal acts of bribery.
- (d) All sponsorships given must be accurately reflected in CIMB Thai's books and records.
- (e) For any sponsorship which does not meet tax deduction requirements, approval of the President and CEO is to be obtained.

2.2.9 CHARITABLE CONTRIBUTIONS/DONATIONS

- (a) Subject to section 2.2.5, CIMB Thai accepts and encourages the act of donating to charities as part of its corporate social responsibility initiatives, whether through services, knowledge, time or direct financial contributions (cash or otherwise),
- (b) Due diligence must be performed by the recommending HOD to ensure that donations are not used to facilitate and conceal acts of bribery and that the donations made are appropriate, legal and ethical under local laws and practices and that it will not result in any conflict of interest.
- (c) All donation requests are to be channeled through the Corporate Communication Department with joint recommendation of the respective HOD. Notwithstanding the submission of the recommendation to the Corporate Communication Department, the requesting HOD will remain to be accountable for the request.

2.2.10 POLITICAL CONTRIBUTIONS

- (a) CIMB Thai does not make any political contributions, whether in cash or in kind, to any political parties, officials or candidates for political office.

2.2.11 RECRUITMENT, PROMOTION AND SUPPORT OF EMPLOYEES

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- (a) CIMB Thai's recruitment, training, performance evaluation, remuneration, recognition and promotion for its employees shall be designed and regularly updated to recognize integrity.
- (b) CIMB Thai shall not offer employment to prospective employees in return for their having improperly favoured CIMB Thai in a previous role.

2.2.12 DEALING WITH THIRD PARTIES

- (a) CIMB's dealing with third parties, shall be carried out in compliance with all the relevant laws and consistent with the values and principles of this Policy. Therefore, CIMB expects all the third parties acting or on its behalf to share CIMB's values and principles. As part of the commitment, all forms of bribery and corruptions are unacceptable and will not be tolerated.
- (b) Employees are required to conduct appropriate counterparty due diligence to assess the integrity of prospective business counterparties and avoid knowingly entering any business dealing with any third party reasonable suspected of engaging in money laundering, bribery, understand the business and background of third parties, improper business practice before entering any business dealings with any third parties.

Employees are required to perform due diligence assessment prior to entering into business dealings and to assess whether it is fit and proper for CIMB to establish business relationships with the third parties. The due diligence assessment is to be guided by the relevant CIMB Internal Policies and Policies such as Group Procurement Policy, Group Brand and Sponsorships Policy, Group AML/CFT/TFF policy and Group Corporate Responsibility Policy. For those Due Diligence Assessment that is not covered under any CIMB internal policy, please refer to Due Diligence Checklist as per Appendix C.

2.2.13 EMPLOYMENT OF GOVERNMENT OFFICIAL

- (a) Before engaging a government official as a director of director of the company or an employee in any position of the Bank or its subsidiaries in the financial business group, such person must be vacated from a government position, to prevent any means to use such employment in exchange for gaining a benefit, which may lead to a risk of fraud, corruption, conflict of interest, unfair government supervision or government favour.

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- (b) In case of employing a person who has ever been a government official to be a director or an employee in any position of the Bank of its subsidiaries in the financial business group, the Bank must check his/her profile to find any possible conflict of interest prior to an appointment.
- (c) In the event that an employee of the Bank of its subsidiaries in the financial business group wishes to perform a policy-related work in the public sector, he/she must vacate from being employed as an employee of the Bank of its subsidiaries within the financial business group first, to prevent possible unlawful favour granting to the entity.

2.2.14 RECORD KEEPING

- (a) CIMB Thai must keep financial records (together with relevant supporting documents that fairly document all financial transactions, risk assessments and due diligence) and have appropriate internal controls in place, which will evidence the business reason for making or accepting payments or gifts to or from third parties.
- (b) CIMB Thai employees must ensure all expenses claims including expenses incurred to third parties relating to hospitality, gifts, travel, entertainment or other are submitted in accordance with the payment authority of CIMB Thai's delegated authority and specifically record the reason for the expenditure.
- (c) All accounts, invoices, memoranda and other documents and records relating to dealings with third parties, such as clients, suppliers and business contacts, must be prepared and maintained with strict accuracy and completeness.
- (d) No accounts must be kept "off-book" or considered "off-record" to facilitate or conceal improper payments.
- (e) The use of false documents and invoices is prohibited, as is the making of inadequate, ambiguous or deceptive bookkeeping entries and any other accounting procedure, technique or device that would hide or otherwise disguise illegal payments.

2.2.15 EMPLOYEES RESPONSIBILITIES

- (a) As an employee or associated person of CIMB Thai, you must ensure that you read, understand and comply with this Policy, and with any training or other anti-bribery and corruption information you are given from time to time. All new employees must sign on the Acknowledgment and Compliance Form (appendix D), which shall be

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submitted to Human Resources to assure that every staff member acknowledge, understand and will put the policy in to practice.

- (b) All employees and associated persons are equally responsible for the prevention, detection and reporting of bribery and other forms of corruption. They are required to avoid any activities that could lead to, or imply, a breach of this Policy.
- (c) All CIMB Thai employees and associated persons must promptly record all transactions and payments accurately and in reasonable detail.
- (d) All CIMB Thai employees and associated persons are required to exercise due care and due diligence at all times when dealing with third parties or business associates and ensure their affairs do not involve any form of corrupt practices, perceived or actual.
- (e) All CIMB Thai employees and associated persons are encouraged to raise concerns about any issue or suspicion of malpractice at the earliest possible stage. If you have reasons to believe or suspect that an instance of bribery or corruption has occurred or will occur in the future that breaches this Policy, or if you are offered a bribe by anyone, if you are asked to make one, if you suspect that you may be bribed or asked to make a bribe in the near future, or if you have reason to believe that you are a victim of another form of corrupt activity, it is your duty to promptly report the matter to your HOD or by following the procedures set out in the Whistleblowing Policy.
- (f) Examples of red flags to look out that warrants further escalation are as follows: -
 - You become aware that a third party engages in, or has been accused of engaging in improper performance (“improper performance” is defined in section 2.2.2 (b) of this Policy);
 - you learn that a third party has a reputation for paying bribes, or requiring that bribes are paid to them, or has a reputation for having a "special relationship" with foreign government officials;
 - a third party insists on receiving a commission or fee payment before committing to sign up to a contract with us, or carrying out a government function or process for us;
 - a third party requests payment in cash and/or refuses to sign a formal commission or fee agreement, or to provide an invoice or receipt for a payment made;

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- a third party requests that payment is made to a country or geographic location different from where the third party resides or conducts business;
- a third party requests an unexpected additional fee or commission to "facilitate" a service;
- a third party demands lavish entertainment or gifts before commencing or continuing contractual negotiations or provision of services;
- a third party requests that a payment is made to "overlook" potential legal violations;
- a third party requests that you provide employment or some other advantage to a friend or relative;
- you receive an invoice from a third party that appears to be non-standard or customised;
- a third party insists on the use of side letters or refuses to put terms agreed in writing;
- you notice that we have been invoiced for a commission or fee payment that appears large given the service stated to have been provided;
- a third party requests or requires the use of an agent, intermediary, consultant, distributor or supplier that is not typically used by or known to us;
- you are offered an unusually generous gift or offered lavish hospitality by a third party;
- a third party never takes time off even if ill, or holidays or insists on dealing with specific parties himself;
- you notice vague, missing documents or records regarding meetings or decisions; and
- company procedures or guidelines are not being followed.
- you notice CIMB Thai employees are given or request favours or offer or accept gifts or any personal benefit or privilege of any kind with a value that could in any way influence a business decision on behalf of CIMB Thai or any other party.
- Award of the contract who worked in procurement or decision making platform.
- Requires payment of a commission, or a significant portion thereof, before, or immediately upon award of contract.
- Request for unusual payment terms.

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- (g) If any employee breaches this Policy, the employee will be subjected to disciplinary action, including dismissal for gross misconduct. CIMB Thai has the right to terminate a contractual relationship with an associated person if the associated person breaches this Policy.

2.2.16 IMMEDIATE FAMILY MEMBERS

- (a) The Policy and Procedure on Giving and Acceptance of Gifts and Entertainment shall also extend to immediate family members of the employee – defined as the employee's spouse, parents, siblings, children, and their respective spouses.
- (b) It is the responsibility of all employees to ensure that their immediate family members are made aware of the Policy and Procedures on Giving and Acceptance of Gifts and Entertainment.
- (c) In the event that the immediate family member had received any gifts, deemed to be arising from the employee's position in CIMB Thai, it must be reported immediately upon the employee becoming aware of the matter.
- (d) Any such gifts received by the immediate family members must be declared and reported in accordance with the Policy and Procedure on Giving and Acceptance of Gifts and Entertainment, and the same due process on acceptance of gifts by employee shall apply.

2.2.17 HOW TO RAISE A CONCERN?

- (a) CIMB Thai provides an avenue for all CIMB Thai employees, business associates and associated persons, members of the public or any stakeholders to disclose any bribery, corruption and other forms of improper conduct within CIMB Thai, including violations of the Policy.
- (b) If you have suspicion or concerns regarding conduct to which this Policy applies, or if you become aware of any action in conflict with this Policy, you must report those concerns or actions to your HOD, or report your concerns, confidentially, by following the procedure set out in the Whistleblowing Policy made available via the the CIMB

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Thai portal <http://syncup.cimb.com>. You are not permitted to ignore, or fail to report, any suggestion of a bribe. There are several channels which you may report your concerns under CIMB Thai Whistleblowing Policy:

- i. Internal Channel: A dedicated email (whistleblow@cimbthai.com) has been established for any whistleblower to direct their disclosure directly to the designated Chairman of the Audit Committee.
 - ii. External Channel: Alternatively, the whistleblower may report directly to relevant government or regulatory authorities and enforcement agencies in Thailand.
- (c) If any CIMB Thai employee is unsure whether a particular act constitutes bribery or corruption, or if he has any other queries, these shall be raised with his respective HOD or the Compliance Department.
- (d) All associated persons must notify in the first instance to the relevant employee(s) of CIMB Thai whom he has been liaising with as soon as possible if he believes or suspects that a conflict with this Policy has occurred, or may occur in the future. That employee upon receipt of such notification must report it to his respective HOD or by following the procedures set out in the Whistleblowing Policy.

2.2.18 PROTECTION TO EMPLOYEES

- (a) CIMB Thai's employees and associated persons who refuse to accept or offer a bribe, or those who raise concerns or report another's wrongdoing may sometimes be worried about possible repercussions.
- (b) CIMB Thai aims to encourage openness and will support anyone who raises genuine concerns in good faith under this Policy, even if they turn out to be mistaken.
- (c) CIMB Thai is committed to the enforcement of this Policy and to ensuring no one suffers any detrimental treatment as a result of refusing to take part in bribery or corruption, or for reporting in good faith their suspicion that an actual or potential bribery or other corruption offence has taken place, or may take place in the future. Such protection is accorded even if the investigation later reveals that the

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whistleblower is mistaken regarding the facts, rules and procedures involved. CIMB Thai prohibits retaliatory action against any person who raises a concern in good faith.

- (d) Detrimental treatment includes dismissal, demotion, suspension, harassment, disciplinary action, threats, termination of the contractual relationship or other unfavourable treatment connected with raising a concern.
- (e) If he believes that he has suffered any such treatment, he shall immediately inform his respective heads of divisions / department / subsidiaries.
- (f) If the matter is not remedied, and he is an employee, he shall raise it formally to the Compliance Department.

2.2.19 TRAINING AND COMMUNICATION

- (a) Training of this Policy forms part of the induction process for all CIMB Thai's new employees.
- (b) All existing employees are required to complete the e-learning courseware relating to this Policy based on the guidelines as determined by the HR-once every 2 years beginning 2021.
- (c) CIMB Thai's zero-tolerance approach to bribery and corruption must be communicated to all CIMB Thai's business associates and associated persons at the outset of CIMB Thai's business relationship with them and as appropriate thereafter. If required, the relevant terms of this Policy will be incorporated in their terms of engagement. There is a need to advise client coverage that CIMB Thai does not ordinarily sign client's B&C declaration and suggest to clients that CIMB Thai has its own internal ABC policy and each CIMB Thai employee and associated persons are required to adhere the same.
- (d) A declaration from associated persons will be required if they have not adopted any ABC policy complying with CIMB Thai Anti-Bribery And Corruption Policy and any requirements, including adequate procedures, required by CIMB Thai Anti-Bribery And

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Corruption Policy. Dispensation may be granted to associated persons who have an ABC policy in place, which is acceptable to Compliance. The form of declaration to be used is as prescribed by the Compliance. CIMB Thai's zero-tolerance approach to bribery and corruption and a link to CIMB Thai's publicly available Anti Bribery & Corruption Policy and Whistle Blowing Policy must be communicated to those who are not required to execute the B&C declaration following dispensation under this section.

(e) In addition to the B&C declaration requirements in 2.2.18(d), a B&C clause is to be incorporated into legal contracts entered into by CIMB Thai with its business associates and associated persons, unless otherwise dispensed by the Compliance. The B&C clause must contain at least the following:

- a. The counterparty undertakes or represents that it shall not and shall ensure that its personnel, officers, directors, agents shall not engage in any form of corruption and bribery OR that the counterparty warrants and undertakes that it has and will comply with all applicable anti-bribery and anti-corruption laws it is subject to;
- b. A breach of such warranty, undertaking or representation of the contract or B&C declaration (if applicable) may be considered by CIMB Thai to be a material breach of the contract and CIMB Thai may, at its discretion, suspend or terminate such contract or relationship; and
- c. a link to CIMB Thai's publicly available Anti Bribery & Corruption Policy and Whistle Blowing Policy.

For contracts already entered into before this requirement came into effect, the B&C clause is to be included when the contract is next renewed, varied or supplemented. In the interim, communication of CIMB Thai's zero-tolerance approach to bribery and corruption and a link to CIMB Thai's publicly available Anti Bribery & Corruption Policy and Whistle Blowing Policy must be communicated to those who are not required to execute the B&C declaration pursuant to 2.2.18(d).

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2.2.20 MONITORING, REVIEW AND DUE DILIGENCE

- (a) Respective HOD must monitor the effectiveness and review the implementation of this Policy regularly considering its suitability, adequacy and effectiveness.
- (b) A single function group such as the Compliance Department would ensure the overall compliance of the B&C program within the organisation in addition to undertaking the role of an internal consultant to the 1st and 2nd Line of Defence units.
- (c) Internal control systems and procedures shall be subject to regular review by Corporate Assurance Department to provide assurance that they are effective in countering bribery and corruption in the respective Division/Department.
- (d) Risk Assessment on corruption is to be conducted annually, with intermittent assessments conducted when necessary. The result of the Risk Assessment is to be tabled to the relevant Board or Board Committees.
- (e) Respective HOD must conduct due diligence on any relevant parties or personnel prior to entering into any business relationships. This shall include the background checks on associated persons, prior to entering into any formalised relationship. (Refer to Appendix C for Due Diligence Form).

2.2.21 FAILURE TO COMPLY

- (a) CIMB Thai regards bribery and acts of corruption as serious matters and will impose penalties in the event of non-compliance with this policy. For CIMB Thai employees, non-compliance may lead to disciplinary action, up to and including termination of employment.
- (b) For CIMB Thai associated person and other external parties, non-compliance may lead to penalties including termination of contracts. Further legal action may also be taken in the even that CIMB Thai's interest have been impacted by non-compliance by individuals and organization.

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2.3 KEY CONTROLS

No	Policy Statement	Key Control	Control Standard	Self-Test Procedure
1	In the event when the gifts could not be refused or returned, the following process shall be adhered: Report to Head of Division (HOD) or President and CEO by completing and submitting the relevant gift registry form.	Completion of the gift registry form.	Quarterly or as and when the audit is conducted by Corporate Assurance Department.	Review of the gift registry form completed during the CET.
2	Risk Assessment on corruption is to be conducted annually, with intermittent assessments conducted when necessary.	Submission of the results of the risk assessment to the Board or Board Committees.	Annually	Review of the risk assessment report by Group Compliance.
3	Conducting due diligence on any relevant parties or personnel prior to entering into any business relationship.	Vendor due diligence to be conducted to ensure they meet the minimum requirement prior to the selection of vendor. The due diligence checks include but not limited to Anti Money Laundering (AML) screening requirement.	Prior to on-boarding new vendor	Refer to Procurement Procedures/Policy.

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2.4 ROLES AND RESPONSIBILITIES

Role	Responsibility
Compliance Department	(a) Oversee and manage B&C issues within the branch/subsidiary; and (b) Identify and assess the B&C risk associated with CIMB Group's activities; and (c) To oversee adequacy and effectiveness of this Policy and key controls.
Human Resource	To take action on employees who breach this Policy.
Board & senior management	(a) Manage the B&C risks identified; (b) Understand the B&C measures required by the relevant legislation, regulations as well as industry's standards and best practices in implementing B&C measures; and (c) Establish “tone from top” to ensure zero tolerance to B&C and consequence of breach including disciplinary action for all levels.
All employees and associated persons	(a) Responsible to ensure that he reads, understand and complies with this Policy. (b) Responsible to avoid any activity that might lead to, or suggest, a breach of this Policy. (c) Responsible for the prevention, detection, and reporting of bribery and other forms of corruption. (d) If a client or potential client offers an employee or an associated person a gift or payment in order to gain a business advantage with CIMB Thai or indicates to that employee or that associated person that a gift or payment is required to secure their business, this must be reported in accordance with the Policy. (e) To complete the e-learning courseware relating to this Policy based on the guidelines as determined by HR. [Note: to also refer to section 2.2.18]
Heads of Divisions / Departments / Subsidiaries	(a) As first line of defence that own and manage risks, has primary and day-to-day responsibility for identifying and managing

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	bribery and corruption risk, implementing this policy, and for monitoring its use and effectiveness (and dealing with any queries on its interpretation, where able). (b) Responsible to monitor the effectiveness and review the implementation of appropriate processes, systems and controls regularly considering its suitability, adequacy and effectiveness. (c) Responsible for the ensuring those reporting to them are made aware of and understand this Policy. (d) Ensure all employee complete the mandatory e-learning programme. (e) Conducting due diligence on any relevant parties or personnel prior to entering into any business relationships. (f) Ensuring that all gifts received from third parties are recorded in a gift register for audit purposes. (g) Develop internal governance process, standard operating procedures (SOPs) and controls for approval of gifts and entertainment, and such other process, system and controls as may be applicable to any business unit/line or functions of circumstances associated to bribery and corruption risk, including those as set out in this Policy.
RCO/DCORO	(a) Responsible to carry out self-assurance checks and compliance controls self-testing. (b) Documentation of compliance controls self-testing and reporting of results, including any breaches. (c) To give effect to the requirements of this Policy.

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2.5 SPECIFIC GOVERNING REGULATIONS

This Policy must comply and be read in conjunction with the applicable regulations as in the list below. All applicable local regulations must be taken into consideration in conjunction with this Policy.

#	Governing Regulations	Link
1	CIMB Group : Group Anti-Bribery And Corruption Policy	Contact Policy Owner if needed
2	Thailand's Private Sector Collective Action Coalition Against Corruption (CAC)	Contact Strategy and CEO's Office if needed

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2.6 KEY INTERNAL REFERENCE DOCUMENTS

This Policy is to be read in conjunction with the following:

- (a) CIMB Thai Code of Ethics and Conduct
- (b) CIMB Thai Conflict Management and Chinese Wall Policy and Procedure
- (c) CIMB Thai Personal Account Dealing Policy and Procedure
- (d) CIMB Thai Policies and Procedures on Giving and Receipt of Gifts and Entertainment
- (e) CIMB Thai Procurement Policy
- (f) Group Marketing Communications policy
- (g) CIMB Thai Country Delegated Authority
- (h) CIMB Thai New Performance Framework, Bonus Framework, Promotion Guideline and Performance Improvement Plan (PIP) Guideline, Recruitment and Selection Process
- (i) CIMB Thai, HR, Whistleblowing Policy การเปิดเผยข้อมูล และคุ้มครองปกป้อง พนักงานที่เปิดเผยข้อมูล หรือให้เบาะแส
- (j) CIMB Thai Corporate Governance Policy
- (k) CIMB Thai Regulations

Where there is a conflict or discrepancy between this Policy, the CIMB Thai's policies and procedure, any regulatory guidelines and any relevant local laws, the matter must be referred to the Human Resources for confirmation and guidance.

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3. POLICY OWNER & DOCUMENT HISTORY & CONTROL

3.1 POLICY OWNER

This policy is owned by the Compliance.

3.2 DOCUMENT HISTORY & CONTROL

Version	Description of Change	Prepared by	Authorized by	Approved Date
7.0	The Policy and Procedure were enhanced and revised by Strategy and CEO's Office Department. The changes made to the Policy and Procedure on Anti-Corruption are mainly to respond to the Self-Evaluation Checklists developed by Thai Institute of Directors (IOD) as part of the process for recertification of the membership of Thailand's Private Sector Collective Action Coalition Against Corruption (CAC).	Strategy and CEO's Office	Board	18-06-2021
8.0	The Policy was enhanced by Group Integrity Governance Unit as a new risk theme owner hence Compliance - CIMB Thai has adopted and revised the policy to align the Group Anti-Corruption Policy.	Compliance	BRCC	21-07-2022
9.0	To be reviewed or updated once every 2 years or as and when required.	Compliance	BRCC	15-10-2024

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3.3 NEXT REVIEW DATE

To be reviewed or updated once every 2 years or as and when required.

3.4 TRANSLATED VERSIONS IN OTHER LANGUAGES

Not available.

3.5 KEYWORDS FOR QUICK SEARCH

Not available.

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APPENDIX A GIFT REGISTER FORM – RECEIVING AND GIVING GIFTS

Gifts Registry Form – Receiving and Giving Gifts *(This form is to be retained in the respective Department for audit purpose)*

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Name of staff		Staff No.	
Department			
Details of Gifts			
Date of receipt given			
Name of other parties and positions			
Name of company / organization			
Nature of relationship with other parties / company / organization			
Description and Purpose of Gift			
Estimated value of Gift			
Signature of staff			
Decision by Delegated Authority			
For gifts received:			
Share with other employees		Hold in Department	
Auction, including sale to employees (please state amount received and where the funds are channeled)			
Donate to charity (state name of recipient)			
Other (please state):			

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Sign-off by Delegated Authority <i>(for Gifts above THB 3,000, please provide sign-off)</i>	
Name and Position	
Signature and Date	
For gifts given:	
Decision by Delegated Authority	
Sign-off by Delegated Authority <i>(for Gifts above THB 3,000, please provide sign-off)</i>	
Name and Position	
Signature and Date	

**For the department for donating to charitable organization, please keep a copy
for future reference and examination.**

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Appendix B Entertainment Registry



Entertainment
Registry.xlsx

APPENDIX C – PARTNER DUE DILIGENCE FOR NON-INDIVIDUALS (NON-BANKING RELATIONSHIP) (Refer to Part 2.2.20)

Partner Due Diligence for Non-Individuals (Non-Banking Relationship)

1. Main Checklist

Date	Insert Date
Name of Partner	Insert Name of Partner
Name of Beneficial Owners	As per OVR Data
Connected Party	Insert Comment (if any)
AML Screening	Insert Comment (if any)

2. General Additional Information

No	Required Information	Description	Findings
1.	Additional Information on the partner's type of business	<i>Understand and document the additional information pertaining to the nature of business.</i>	Insert Comment (if any)
2.	Country of source of income and source of wealth	<i>Understand and document the country where partner is generating income and wealth.</i>	Insert Comment (if any)
3.	Source of Funds	<i>Understand and document where the funds being deposited into the respective CIMB Entity's account <u>originates from</u>. For e.g.: business income, franchise fees etc.</i>	Insert Comment (if any)

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4.	Source of Wealth and Estimated Net-worth	<i>Understand and document the business activity that generated the <u>accumulated</u> AND on-going accumulation of wealth. For accumulated source of wealth, it can be evident from the nature of business. For on-going accumulation of wealth, it can be based on business profitability, positive working capital and other external injections. For e.g.: share issuance, venture capital, loans/financing, bonds/sukuk etc.).</i>	Insert Comment (if any)
5.	Country where the person frequently visits and transacts with	<i>Understand and document the country where person frequently visits and transacts with.</i>	Insert Comment (if any)
6.	Banking reference	<i>Understand and document the name of introducer, type of relationship and duration of relationship Obtain and document partner's other banking relationship and duration of the relationship</i>	Insert Comment (if any)
7.	Prior rejection	<i>Understand and document whether partner has previous been rejected by other financial institutions or CIMB branches.</i>	Insert Comment (if any)

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8.	Tax Status	<i>Understand and document the partner's current tax status.</i>	Insert Comment (if any)
9.	Sustainability Watchlist and Exclusion List activities	<i>Understand if the partner is under the Sustainability Watchlist or involved with the Exclusion List activities (i.e. illegal activities, bribery, breaches of national labour laws and human trafficking laws, illegal logging or uncontrolled fire, terrorism, smuggling and greenfield thermal coal mines / coal-fired power plant).</i>	Insert Comment (if any)
10.	Fines, penalties, regulatory sanctions, or major controversies	<i>Understand if the partner has been subject to fines, penalties, regulatory sanctions, or major controversies in the last 3 years in relation to (1) environmental issues such as violations of environmental limits on pollution, deforestation, desertification, destruction of natural habitats and ecosystems; or (2) social or ethical issues such as national labour laws, human rights, modern slavery, child labour, social discrimination, bribery, corruption, exploitation, health, and safety.</i>	Insert Comment (if any)

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3. Ownership, Beneficial Owners, Key Controllers and Office Bearer

No	Required Information	Description	Findings
1.	Additional Information on the owners, occupation or nature of business	<i>Understand and document the additional information pertaining to the owner and nature of business.</i>	Insert Comment (if any)
2.	Country of source of income and source of wealth	<i>Understand and document the country where the income and wealth are being generated.</i>	Insert Comment (if any)
3.	Source of Funds	<i>Understand and document where the funds being deposited into the respective CIMB Entity's account <u>originates from</u>. For e.g.: employment salary, income etc.</i>	Insert Comment (if any)
4.	Source of Wealth and Estimated Net-worth	<i>Understand and document the <u>accumulated and on-going accumulation of wealth</u> by the person. For e.g.: sale of artwork/painting, lottery betting/winning, person's pension, inheritance, active business investments, sale of property.</i>	Insert Comment (if any)

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4. Politically Exposed Persons (“PEP”) Controlled Entity

No	Enhanced Due Diligence Information	Description	Findings
1.	Title and Position	<i>Understand and document the political details. For e.g.:</i> • <i>Current Title and Position.</i> • <i>Former Title and Position.</i>	Insert Comment (if any)
2.	Political Relationship	<i>Understand and document whether there are any on-going link or relationship or is closely connected with any other active Politically Exposed Persons.</i>	Insert Comment (if any)
3.	Political Duties	<i>Understand and document the political duties that has been assigned to the person or the person is required to participate in.</i>	Insert Comment (if any)
4.	Political Appointment	<i>Understand and document how the person is being appointed in the current position. For eg: appointed by another PEP, elected by the public etc.</i>	Insert Comment (if any)
5.	Political Involvement	<i>Understand and document whether the person is also actively involved in other political activities currently not assigned/designated in the existing position.</i>	Insert Comment (if any)
6.	Length of Career/Relationship	<i>Understand and document the duration in which the person has been in a PEP/Family Member/Close Associate.</i>	Insert Comment (if any)
7.	Additional Source of Wealth and Estimated Net-worth	<i>Understand and document whether there is any wealth being accumulated from official political duties.</i> <i>If a Political Party is involved, to verify and document the source of wealth and source of funds.</i>	Insert Comment (if any)

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5. **Adverse Media** (Where the non-individual person is identified with adverse media).

No	Adverse Media Information	Description	Findings
1.	Source of Adverse Media	<i>Document where the source of adverse media is being discovered/obtained/ verified. For e.g.:</i> • <i>Credible or Non-Credible Online news articles</i> • <i>Credible or Non-Credible Newspaper</i> • <i>Credible or Non-Credible Journals</i>	Insert Comment (if any)
2.	Facts of the Adverse Media	<i>Understand and document the details of the adverse media being discovered/obtained.</i>	Insert Comment (if any)
3.	Type of Involvement	<i>Understand and document the details of how the person is involved in the adverse media.</i>	Insert Comment (if any)
4.	Nature of Adverse Media	<i>Understand and document the type of adverse media being identified. Eg. Speculative, Gossip, Hear-Say, Allegations, Conclusive, Historical etc.</i>	Insert Comment (if any)
5.	Ambiguity of Adverse Media	<i>Understand and document whether there is any ambiguity in the adverse media being identified.</i>	Insert Comment (if any)
6.	Disposition Decision	<i>Provide analysis and rationale to support the dispositioning decision</i>	Insert Comment (if any)

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6. Justification to proceed.

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7. Approvals

Name of Head of Department	<i>Insert Name</i>
Designation	<i>Insert Designation</i>
Sign-Off	<i>Signature / Attached Email</i>
Date of Sign-Off	<i>Signature / Attached Email</i>

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APPENDIX D

Acknowledgement and Compliance Form *(ref: Section 2.2.14 Employees Responsibilities)*

Acknowledgement and Compliance Form

I read, acknowledge, understand and strictly comply with the Policy and Procedure on Anti-Bribery and Corruption Policy and any new updated version that announced by the Bank.

I understand that strict compliance with the Anti-Bribery and Corruption Policy is a condition of my employment, any breach of which will render me liable to disciplinary actions including summary dismissal.

Signature:

(.....)

Corporate Title:

Date:/...../.....

Please submit this form to Human Resources.

Please find the detail of the Anti-Bribery and Corruption Policy in:

- Sync-Up > TH > Governance > Policies > Anti-Bribery and Corruption Policy.

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Sign Off Document	
Subject :	Announcement of Anti-Bribery and Corruption Policy version 9.0
Description :	Board Risk & Compliance Committee Meeting No. 10/2024 dated 15 Oct 2024 has approved the revised Anti-Bribery and Corruption Policy version 9 of CIMB Thai Bank Public Company Limited. Therefore, the Anti-Bribery and Corruption Policy version 8 which was in effective since 1 October 2022 shall be terminated and replaced by the revised policy
Requester :	Pattjira Chairattapornnont 01/11/2024

Sign Off

Name	Comment
<i>Chee Kin, Paul Wong</i> President and CEO and Acting Head, Operations TH Approved 01/11/2024 16:10:46 	
<i>Patima Jumpsut</i> Head, Company Secretary and Administration TH Acknowledged 01/11/2024 16:58:54 	
<i>Oranun Yomprasert</i> Secretary to President and CEO, Thailand Acknowledged 01/11/2024 15:39:10 	
<i>Jidapa Rouge</i> Assistant Vice President, Document Administration and Control Coordination TH, Company Secretary and Administration TH Acknowledged 01/11/2024 16:31:32 	