



Anti-Corruption Policy

Home Product Center Public Company Limited

Home Product Center Public Company Limited is committed to conducting its business with integrity, transparency and morality and in compliance with good corporate governance practice, and refusing to accept all forms of corruption. The Board of Directors of the Company has declared its intention to be an alliance of Private Sector Collective Action Coalition Against Corruption: CAC and requested the Company's personnel to strictly comply with Anti-Corruption Policy.

To ensure that Home Product Center Public Company Limited and its personnel will proceed properly to prevent and to act against the corruption and to be in line with its intention, the Company, then, according to its internal control principle, has prepared the "Anti-Corruption Policy" in writing to be used as a guideline and for clear operational control system. This Anti-Corruption Policy is made to be in consistent with Thai laws.

Definition

Company	means Home Product Center Public Company Limited and its subsidiaries, affiliates, other companies, over which the Company has power to control, and its business agents.
Company's personnel	mean director, executive, and employee of the Company.
Director	means director of the Company.
Executive	means management of the Company from the level of senior vice president onwards.
Employee	means full-time employee from the level of executive downwards.
Trading Partner	means supplier and service provider to the Company, designer, consultant, contractor and sub-contractor.
Stakeholder	means shareholder, customer, Trading Partner, creditor, Employee and government sector.

Corruption

means any type of bribery which here refers to dishonest act requesting or offering /promising to give bribe, extortion or having conflict of interest to public official or private sector officer or relevant person, either directly or indirectly, in terms of money, property or any improper benefit in order for such person to exercise or not exercise his function for the acquisition or maintenance of business or any improper business benefit unless the law, regulation, notification, rule, tradition or business practice has allowed so.

Political Contribution

means giving financial support or by any means, either directly or indirectly, to support political activities e.g. giving loan, donating thing or providing service, advertising to support political party or making contribution to any political campaign of organization having close relationship with political party to cause any wrongful reciprocal benefit, etc.

Policies and Guidelines

1. Director, Executive and Employee of the Company are prohibited to request, act or accept all types of corruption in all sectors, both government and private, where the Company's business is involved. We shall jointly promote our morality and responsibility value to be our organizational culture.
2. The risk on corruption act shall be assessed and the consistent practical measure of such risk shall be provided according to the internal control system.
3. Orientation and training course for personnel shall be provided for their understanding on anti-corruption policy, measure and procedure.
4. An internal control system shall be provided for an efficiency and effectiveness of anti-corruption policy which such shall cover financial and accounting information recording process, human resource management process and other processes related to the Company's operation.
5. The compliance of anti-corruption policy must be reported, monitored and reviewed by having suitable operation process provided in order to ensure that the policy is completed, sufficient and updated.
6. A secured communication channel shall be provided to the Company's personnel in order to enable them to request for any suggestion, to inform any trace, to give any recommendation or to complain any corruption matter, provided however, that protection measure on the right of such person shall be given.
7. A communication on the anti-corruption policy shall be conducted both inside and outside the Company for broad compliance, and shall be made to its

subsidiaries, affiliates and other companies, over which the Company has power to control and its business agents in order to take the Company's anti-corruption policy to be implemented.

8. To support the exchange of knowledge, experience and good practice between companies being in the same industry and all related persons to be an alliance and to attend the anti-corruption campaign organized by other companies, societies, chambers of commerce or governance sectors.
9. To record and maintain financial and accounting information of the Company correctly, completely, transparently and verifiable by having efficient and trustable internal control system provided under the audit committee's supervision.

Related Measures and Guidelines

Political Contribution

The Company is neutral in political matter and has no political contribution policy and no action to show that the Company is interested in any particular political party or political group. The Company's personnel have their right and freedom given by the Constitution and other relevant laws e.g. vote for election. The Company's personnel shall not use any property of the Company or provide any service on behalf of the Company to support any political activity or shall not perform any action to cause others to understand that the Company is related to or supports any particular political party or political group.

Receiving and Giving Gifts or Other Benefits

It is prohibited to receive or give any gift or benefit unless such is made correctly, openly and transparently and not in violation of good moral, laws and practical regulations of the Company as well as government sectors, state enterprises and other related sectors and suitable with situation, season and local tradition and not used as an excuse for corruption and shall not cause any conflict between personal benefit and company benefit. Also, it is prohibited to receive or give any gift or benefit if such will affect the Company's operation.

Donation for Charity or Subsidy

Such must be performed correctly, directly and transparently and not in violation of a good moral, laws, practical regulations of the Company as well as other government sectors, state enterprises and agencies related and must be consistent with social, community and environmental policies or any activity to promote the sustainable development of the Company or any activity to create social benefit for society. Moreover, such shall not be used as an excuse for any type of corruption and have no

hidden objective to cause any advantage or motivation in business benefits and shall not cause any conflict between personal benefit and company benefit. In this regard, letter of approval for such matter is required and the objective and recipient name/sector must be clearly provided with related document attached in order to be proposed to an authorized person for his approval before proceeding.

Purchasing Inspection and Making Agreement

Working plan, policy and authorization must be clearly specified and controlling measure must be clearly provided in order to be complied by related employees. In case the work operation is delayed, the approval must be obtained as indicated in the regulation. Also, the service center should be established in order to verify and confirm its correction regularly.

However, to execute the anti-corruption measures in the organization widely, the Company shall establish the supporting process for sufficient prevention of corruption e.g. inspection process in sale and marketing, purchasing, human resource management, financial and accounting etc. Moreover, practical regulations for internal use must be supervised in which the prevention of corruption must be efficiently covered.

Duties and Responsibilities

The Board of Directors has its duties and responsibilities to consider and approve the policy as well as to control the support system on anti-corruption for its effectiveness and to ensure that the Executive and Employee in all levels have realized and concerned on anti-corruption issue. The Board of Directors shall cultivate such policy as the organizational culture and urgently consider the matter related to the corruption for timely supervision and operation.

Audit Committee has its duties and responsibilities to audit financial and accounting statement, internal control system, internal audit system and risk management related to contingent risk caused by the corruption in order to ensure that the Company's operation is circumspect, suitable and efficient. Also, the Audit Committee shall urgently consider the matter related to the corruption for timely supervision and operation.

Managing Director, Management Team and Executive have their duties and responsibilities to stipulate the system and to promote and support anti-corruption policy to be communicated to all employees and related persons. Moreover, they have to consider the suitability of all systems and measures to be consistent with the change of business, rule, regulation and law as well as to propose any urgent matter related to the corruption (if any) to the Audit Committee and the Board of Directors.

Risk Management Committee has its duties and responsibilities to supervise and support the operation of risk management for sufficient and appropriate anti-corruption.

Internal Audit Office has its duties and responsibilities to revise and verify the Company's performance whether or not such is correct as indicated in related policy, guideline, authorization, practical regulation and law or related regulation in order to ensure that the control system is suitably and sufficiently provided to prevent possible risk of corruption. Internal Audit Office has to report the Audit Committee as well as to inform and follow up on the outcome with related department to ensure that the management team has already improved and corrected such issue.

Company's personnel shall perform their functions to be consistent with this policy. In case any suspicion or any violation is found, such must be reported to supervisor or through reporting channel provided in the whistleblower procedures of the Company.

Whistleblower Procedures and Protection

1. The Company has indicated whistleblower procedures for stakeholders to inform any trace or complaint with evidences via following channels:
 - Contact directly to the Board of Directors to give his opinion regarding business operation as well as to inform any trace or complaint via www.hompro.co.th in contact us section > contact Board of Directors.
 - Contact directly to the Audit Committee to give his opinion regarding business operation as well as to inform any trace or complaint via www.homepro.co.th in contact us section > contact Audit Committee.
 - Contact Audit Committee through Internal Audit Office by posting mail to:
Internal Audit Office
Home Product Center Public Company Limited
96/27 Moo.9 Tambol Bang-Khen, Amphoe Muang, Nonthaburi Province
11000
 - Contact Human Resource Department by posting mail to:
Human Resource Department
Home Product Center Public Company Limited
96/27 Moo.9 Tambol Bang-Khen, Amphoe Muang, Nonthaburi Province
11000
2. Whistleblower Protection: Interested person who informs any trace or complaint as specified in Clause 1:
 - Whistleblower mentioned above is not required to disclose his name;

- In case of whistleblower informing his/her name to the Company, the Company shall not disclose his/her name, address or any information that can indicate personality of the whistleblower and shall keep such information as confidential.
- It shall be deemed as responsibility of the Company or supervisor or leader to use his discretion to reasonably command in order to protect the whistleblower, witness and any person giving information for inquiry not to receive any trouble or injustice as the result of such complaint, witness or giving information.

How to Communicate and Publish Anti-Corruption Policy and Practical Regulation

Anti-corruption policy and measure must be communicated to related persons for their acknowledgment which comprise of directors, executives, employees, subsidiaries, affiliates, other companies, over which the Company has power to control, business agents and Trading Partner through communication channel of the Company e.g. the Company's signboard, website (both intranet and outside of the Company), annual report, email as well as to disclose such policy to public.

In addition, as a good example, the Company also supports our Director and Executive to provide their knowledge to the Employee for the compliance of anti-corruption policy and measure.

However, once related policy and measure are prepared or improved, such information should be communicated and disclosed through appropriate communication channel at all times.

Sanction

Any personnel of the Company violating or not complying with Anti-Corruption Policy shall be regarded as violation of the Company's order and regulation and he/she shall be considered for disciplinary action as indicated in the Company's regulation or related criterion/rule. In addition, according to the law, such person may be punished if his action is illegal.

However, the Company will not degrade, punish or give negative effect to Director, Executive and Employee who refuse any form of corruption even though such action will cause the Company to lose its business opportunity.