Corruption Risk Management Manual

FRAs: FRAUD RISK-ASSESSMENTS

"Airports of Thailand PLC.

Revised Edition 1/2023

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1 Introduction

Thai Airports Public Company Limited ("AOT" or "the Company") recognizes the importance of combating corruption. Therefore, the Company has prepared this Anti-Corruption Risk Management Manual ("the Manual") to serve as a guideline for practices and as a part that helps the Company to conduct its business in accordance with the specified commitments.

1.1 Objectives

AOT has created this Manual with the objectives to:

1. Define activities and procedures to guide AOT employees in preventing, detecting, and responding to corruption risks.

2. Identify the responsibilities of the Board of Directors, executives, and employees in each position to clarify their roles in preventing, detecting, and responding to corruption risks according to good practice guidelines.

3. Establish procedures to enable AOT employees to properly and promptly prevent, detect, and respond to corruption risks.

1.2 Enforcement

This Manual covers the operations of the AOT Board of Directors, subcommittees, executives, all employees, and contractors, as well as all subsidiaries and affiliated companies (collectively referred to as "AOT employees"). This Manual sets forth guidelines for preventing, detecting, and responding to corruption risks for AOT employees and individuals related to business operations to comply with, and this Manual should be used in conjunction with the "Good Corporate Governance Manual" and the "Anti-Corruption Policy" of AOT.

1.3 Definition of Corruption

The definition of corruption in this Anti-Corruption Risk Management Manual refers to intentional acts aimed at obtaining benefits that should not rightfully be acquired by law for oneself or others, such as family members or acquaintances. Corruption can be categorized into three types as follows:

1. Embezzlement

Any act that leads to the wrongful possession of the Company's property or causes the Company to lose property, opportunities, or benefits, with the intent to gain advantages for oneself or others.

2. Reporting Fraud

The modification of various reports, including financial statements, financial records, or non-financial reports, to conceal misappropriation or improper actions, or to pursue personal or other benefits, results in inaccuracies in the company's financial statements, financial records, or other reports.

3. Corruption

The misuse of authority to gain undue advantages for the organization, oneself, or others. Corruption encompasses activities such as giving and/or accepting bribes, conflicts of interest, intimidation and/or solicitation of benefits, and payments for convenience. Consequently, the definition of "corruption" in this Fraud Risk Management Manual includes misappropriation of assets, fraudulent reporting, and corruption. Should AOT employees have any uncertainties regarding whether a specific activity constitutes fraud, they may seek guidance from the following units:

▪ Their direct supervisor

▪ The Corporate Compliance and Anti-Corruption Department This advisory channel is secure and complies with the confidentiality and protection measures outlined in the "Procedures for Receiving Complaints or Reporting Corruption."

2. AOT's Corruption Risk Management Concept

AOT is dedicated to preventing and eradicating any conduct that may indicate corruption and addresses such matters promptly and decisively. Consequently, AOT will not tolerate any corrupt practices and will not overlook actions that may facilitate corruption. To confirm that AOT employees align with the company's commitment to combating corruption, all employees must comprehend and strictly adhere to the "Corruption Risk Management Manual," the "Good Corporate Governance Manual," the "Anti-Corruption Policy," and all related operating procedures and policies, without exception. This adherence is essential to prevent actions that may lead to inappropriate behavior and contravene good corporate governance principles.

AOT pledges to investigate all suspected cases of corruption thoroughly and appropriately, irrespective of external factors such as job title, length of service, or internal relationships regarding the accused. Investigations will be conducted impartially and without bias. Moreover,

AOT will impose the maximum penalties provided by law on offenders. Should investigations reveal that employees were aware of corruption but failed to report it, AOT will consider disciplinary action against those employees.

3. AOT's Corruption Risk Management Structure

AOT has established a comprehensive fraud risk management framework, clearly defining the roles, responsibilities, and duties of all participants in the fraud risk management process. This framework includes members of the AOT Board of Directors, the Corporate Governance Committee, the Risk Management Committee, the Audit Committee, the AOT President and executives, the Human Resources and Administration Division, the Audit Office, the Compliance and Corruption Prevention Division, the Corporate Communications Division, the Welfare and Labor Relations Division, the Risk Management Division, and other relevant departments. Furthermore, external entities engaging in business with AOT, referred to as third parties, are also included within this framework.
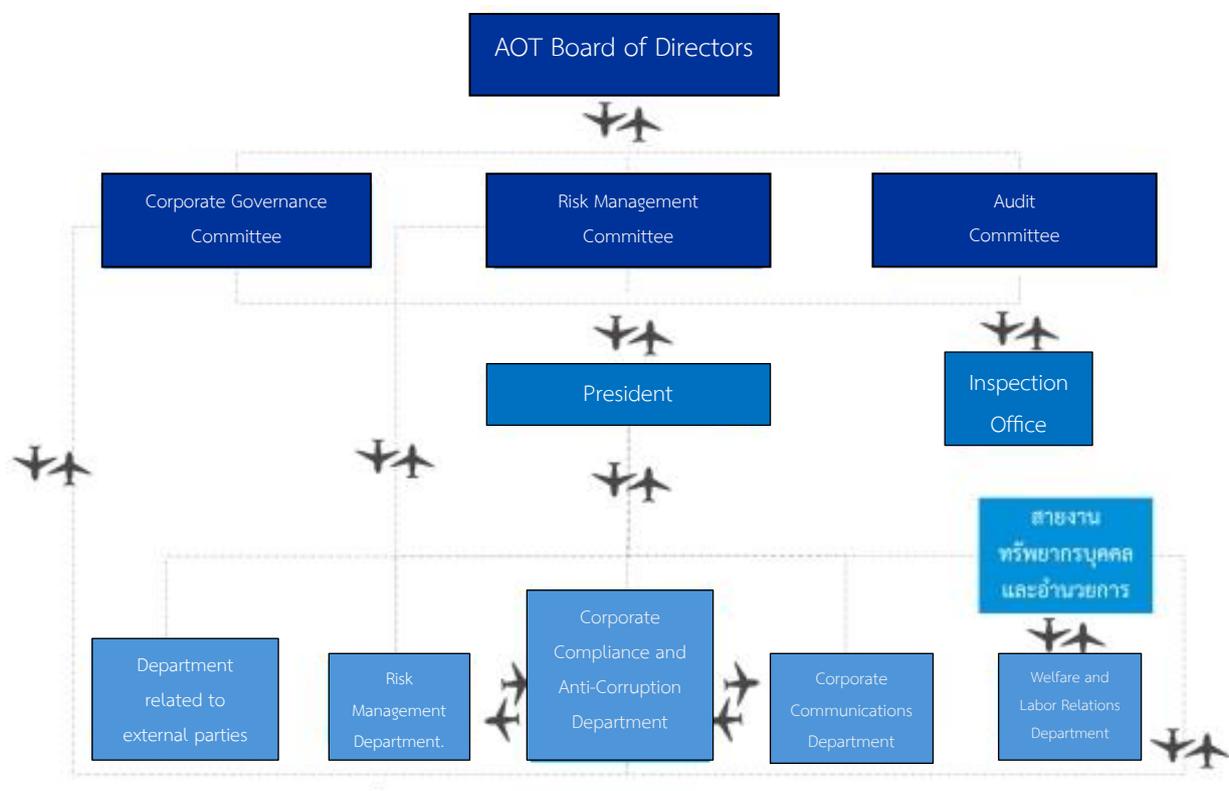
As per the AOT corruption risk management structure outlined above, the AOT Board of Directors will appoint the Corporate Governance Committee to supervise anti-corruption initiatives. The Risk Management Committee will facilitate corruption risk management in accordance with AOT's anti-corruption policy. The Audit Committee will ensure the effectiveness of internal audits, encompassing anti-corruption measures.

The AOT Board of Directors has appointed the AOT President to design and implement plans, procedures, and internal controls for corruption risk management. The Corporate

Compliance and Corruption Prevention Division oversees AOT's anti-corruption initiatives, monitoring operations, and disseminating information related to corruption. The AOT Human Resources, Human Resources and Administration Division (Welfare and Labor Relations), Audit Office, Risk Management Division, Corporate Communications Division, and external departments support AOT's anti-corruption efforts.

4. Roles, Duties, and Responsibilities

In accordance with the AOT's corruption risk management framework, AOT has delineated the roles, duties, and responsibilities of authorized individuals, executives, and employees to collaboratively address corruption risks, as follows:

4.1 AOT Board of Directors The AOT Board of Directors is tasked with the establishment of policies, supervision, control, and oversight of anti-corruption practices. The primary responsibilities include:

- Establishing policies and overseeing operations pertaining to corruption risk management.
- Defining and assigning responsibilities for corruption risk management, alongside other anti-corruption processes such as whistleblowing, investigation, and corruption risk assessment, to the Board of Directors and executives who possess the necessary experience, knowledge, and qualifications.
- Demonstrating leadership in commitment to anti-corruption initiatives to inform AOT employees, business stakeholders, and the public.
- Ensuring compliance with policies or measures related to corruption risk management.

4.2 Corporate Governance Committee

The Corporate Governance Committee is tasked with overseeing anti-corruption measures as delegated by the AOT Board of Directors. Its primary responsibilities include:

- Managing the overall corruption risk management measures within the organization as directed by the AOT Board of Directors.
- Evaluating, establishing, reviewing, and enhancing corruption risk management policies and practices for presentation to the AOT Board of Directors, while ensuring adherence to these policies and practices.
- Receiving reports concerning corruption, including periodic reports on general corruption, urgent reports on serious incidents, and reports pertaining to investigations and penalties.
- Ensuring that the whistleblowing and investigation processes remain independent and appropriate, particularly when the accused party holds an executive position.

▪ Present the findings of corruption risk management, including reports on various corruption cases, to the AOT Board of Directors and relevant committees for their acknowledgment

4.3 Audit Committee

The Audit Committee is tasked with establishing effective internal audits, including anti-corruption measures, and reporting the findings of these audits to the AOT Board of Directors. Its primary responsibilities encompass:

▪ Reviewing the internal audit plan of the Audit Office to ensure comprehensive coverage of internal control assessments in alignment with corruption risk management strategies and relevant policies, as well as evaluating corruption risks across various operational processes.

▪ Receiving and analyzing reports related to corruption, including periodic updates on general corruption, urgent notifications of serious corruption incidents, and reports on investigations and disciplinary actions, while making informed decisions on procedures in response to reported corruption cases.

▪ Providing auditors with pertinent information regarding the AOT Board of Directors' role in corruption risk management and seeking consultation in the event of significant corruption incidents.

▪ Engaging regularly with financial advisors and independent consultants to assess corruption risks and evaluate the efficacy of related internal controls, when applicable.

▪ Reporting the outcomes of internal audits to the AOT Board of Directors.

4.4 Risk Management Committee

The Risk Management Committee is tasked with overseeing and supporting corruption risk management in accordance with AOT's anti-corruption policy. Its primary responsibilities include:

▪ Reviewing the organization's risk management policies, guidelines, and scope to ensure comprehensive coverage of corruption.

▪ Acknowledging risk assessment results and performance reports.

▪ Reporting significant risks to the AOT Board of Directors.

4.5 AOT President and Executives

The AOT President and Executives are accountable for developing and executing plans, procedures, and internal controls for managing corruption risk to prevent, detect, and respond to potential corruption within the organization. The responsibilities of the company's executives are as follows:

- Support and promote anti-corruption values throughout the organization.

- Establish comprehensive procedures, operations manuals, and internal controls within relevant processes to prevent corruption, with ongoing reviews and enhancements.

- Assign oversight responsibilities for the fraud risk management framework and policy to qualified employees or teams, ensuring they have sufficient time to discharge their responsibilities.

- Prevent and investigate suspected fraud by implementing a background check process for business partners to verify their credentials and financial integrity, thereby mitigating potential risks.

- Communicate and underscore the importance of the fraud risk management process to both employees and external partners, ensuring continued awareness.

- Approve publicly disseminated information related to fraud.

4.6 Human Resources and Administration Division

The responsibilities of the Human Resources and Administration Division in corruption risk management are as follows:

- Support executives and the Compliance and Anti-Corruption Division in organizing training to enhance AOT employees' awareness regarding ethics, corruption risk management, and anti-corruption measures.

- Deliver training programs to improve employee knowledge and skills, ensuring their competence in preventing corruption within their roles.

- Verify the background and credentials of employees in key positions, including their qualifications, skills, and work history, to ensure integrity and honesty.

- Conduct exit interviews to address concerns related to corruption within the organization and to gather insights regarding employee experiences during their tenure.

4.7 Audit Office

The Audit Office is tasked with the independent and objective review and provision of advice to ensure that the risk management and internal control processes concerning anti-corruption are both adequate and effective. Its primary responsibilities include:

▪ Evaluating the design and implementation of internal controls for corruption risk management

▪ Assessing the effectiveness and efficiency of these controls

▪ Reporting any observations or issues of corruption to the Audit Committee in a timely manner

▪ Facilitating timely communication of any observations or issues related to corruption among the Audit Office, the Compliance and Anti-Corruption Division, and other relevant departments.

4.8 Corporate Compliance and Anti-Corruption Division

The Corporate Compliance and Anti-Corruption Division ("CAC") is tasked with overseeing AOT's anti-corruption initiatives, as well as monitoring operations and disseminating information related to corruption within the organization. The primary responsibilities of the Corporate Compliance and Anti-Corruption Division include:

▪ Reviewing policies, procedures, and processes associated with anti-corruption and corruption risk management to ensure complete and effective implementation.

▪ Conducting an annual corruption risk assessment, assigning employees with the requisite experience, knowledge, skills, and qualifications.

▪ Reporting and coordinating with the AOT Board of Directors, the Corporate Governance Committee, and the President and CEO regarding anti-corruption and corruption risk management.

▪ Serving as a central liaison and providing guidance on operational processes and other matters related to anti-corruption and corruption risk management.

▪ Advising executives on corruption risk assessments, including the compilation of relevant information. The outcomes of the corruption risk assessment will be utilized to prepare the organization's corruption risk document and to monitor the implementation of the risk management plan for presentation to the AOT Risk Management Working Group and the Risk Management Committee.

- Developing a communication plan and conveying anti-corruption and corruption risk management requirements to AOT employees and external stakeholders.
- Providing information in the event of issues related to organizational corruption risk or the emergence of new corruption risks.
- Ensure that each department implements sufficient anti-corruption and corruption risk management measures and remain vigilant to significant corruption risk events to facilitate effective and timely management.
- Function as a centralized unit to receive complaints or information pertaining to corruption. - Oversee adherence to AOT's anti-corruption policy.

4.9 Corporate Communications Department

The Corporate Communications Department is tasked with supporting executives and the Compliance and Anti-Corruption Department in the consistent dissemination of information regarding corruption risk management both internally and externally.

4.10 Welfare and Labor Relations Department the Welfare and Labor Relations Department is responsible for receiving complaints from the President-General for initial evaluation, supporting investigations and inquiries, reporting findings to the President-General, and implementing disciplinary actions against employees.

4.11 Risk Management Department

The Risk Management Department serves as the technical authority on internal control and risk management. The department provides expertise, guidance, and support to executives and employees at all levels in the implementation of the internal control and risk management system. This initiative aims to integrate internal control and risk management into work processes and embed it within the organizational culture. The department also undertakes related tasks as assigned.

4.12 Departments Related to External Parties Conducting Business with AOT (Third Parties) Departments interacting with external parties conducting business with AOT (Third Parties) are responsible for reviewing the backgrounds of business stakeholders, particularly vendors, contractors, and service providers associated with the company.

4.13 AOT Employees All AOT employees are accountable for understanding the policies and manuals related to corruption risk management. They are expected to promote anti-corruption efforts within the organization and report any incidents of corruption or potential corruption to authorized individuals. The responsibilities of AOT employees are outlined as follows:

- Review the policies or manuals pertaining to corruption risk management.

- Clearly convey the policies or manuals related to corruption risk management to relevant business stakeholders. - Comprehend your responsibilities in corruption risk management and fulfill your assigned obligations.

- Collaborate to foster an anti-corruption organizational culture. Participate in meetings and training sessions related to corruption risk management.

- Report any irregularities, inappropriate conduct, or suspected instances of corruption to the company's designated channels.

- Provide information to the investigation committee or assist when requested.

- Remain vigilant regarding risk factors and promptly notify your supervisor of any issues related to corruption risk.

It is the responsibility of all employees, from general staff to AOT board members, to understand and adhere to these manual and other related policies and procedures without exception. Violations or non-compliance with these policies and manuals may lead to disciplinary action.

5 Corruption Prevention Processes

Corruption prevention processes are essential in mitigating the risk of corruption at AOT. Accordingly, evaluating corruption risks, establishing and executing effective internal controls, and promoting anti-corruption awareness and values among AOT employees are critical components in preventing corruption within the organization. This corruption prevention strategy, as detailed in this corruption risk management manual, comprises the following five primary activities:

5.1 Fraud Risk Assessment

The fraud risk assessment aims to proactively identify, assess, and review the organization's fraud risks across all categories. This process enhances awareness of potential fraud risks, their impacts on organizational objectives and operations, ensuring timely identification and management. Collaboration from executives across all departments is essential for providing information regarding potential fraud risks within their respective areas.

The fraud risk assessment consists of six primary steps, aligned with AOT's enterprise risk assessment procedures outlined in the Risk Management Manual. These steps are as follows:

Step 1: Environmental Analysis Conduct a comprehensive analysis of changes stemming from both internal and external factors that may influence AOT's key objectives and potentially result in corruption.

Step 2: Risk Analysis Utilizing the findings from the data collection and the analysis of the evolving environment and potential corruption from Step 1, identify potential risk events and evaluate the risk level by assessing the likelihood and impact of each risk. This evaluation is conducted by referencing the risk assessment criteria (likelihood and impact), risk score and level, and the risk diagram presented in the table on the following page.

Likelihood Risk Assessment Criteria

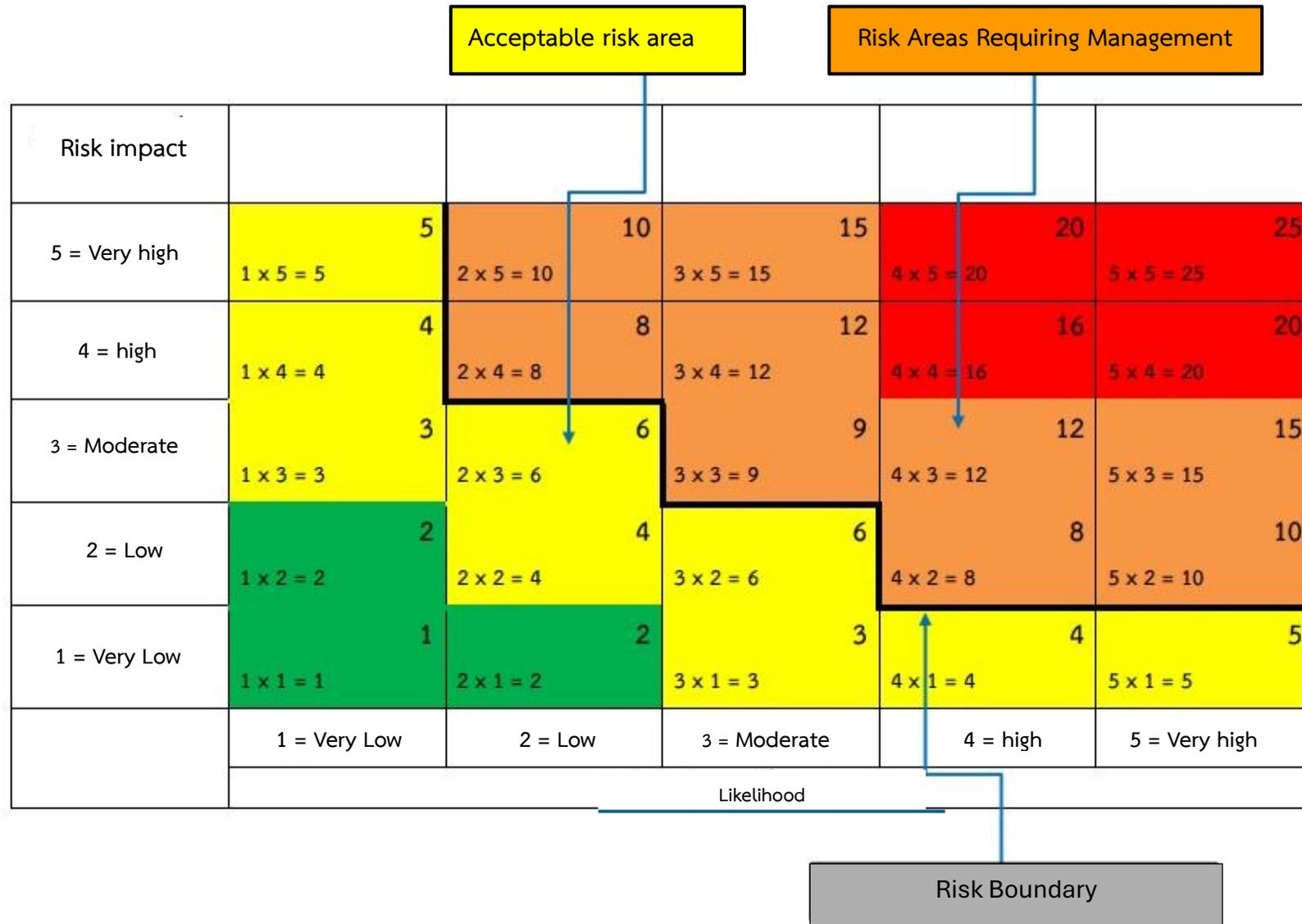| Score Value	Explanation	Evaluation criteria (if not previously established).	Evaluation criteria (if applicable)
1	Very Low	Very low likelihood	Never occurred
2	Low	Low likelihood	Rarely occurred
3	Moderate	Moderate likelihood	Moderately occurred
4	High	High likelihood	Frequently occurred
5	Very High	Very high likelihood	Very frequently occurred

Impact Risk Assessment Criteria

Score Value	Explanation	Reputation Evaluation Criteria	Regulatory Assessment Criteria
1	Very Low	No effect on reputation or image	Never occurred
2	Low	Deterioration of the organization's reputation and image	Rarely occurred
3	Moderate	Damage to reputation and image: negative information is disseminated regarding the organization through social media and other channels, reaching public media within a confined geographical area of the country	Moderately occurred
4	High	The reputation and image of the organization have been adversely affected. Negative news narratives have proliferated through social media and other communication channels, subsequently permeating public media. This situation has culminated in a significant social issue	Frequently occurred
5	Very High	Reputational and image damage: Adverse information regarding the organization disseminates via social media and other channels, consequently reaching public media. This phenomenon is prevalent both domestically and internationally	Very frequently occurred

Score and Risk Level

Score (Likelihood x Impact)	Risk Level	Risk Response Approach
16 - 25	Very Low	This represents a significant risk that surpasses the organization's acceptable risk threshold (16-25). This necessitates a thorough examination of the acceptable risk level to formulate supplementary action plans for risk management
8 - 15	Low	This represents a significant risk that remains within the acceptable risk level range (8-15). Management should consider formulating a plan for supplementary operations or enhancing the effectiveness of current internal measures or controls
3 - 6	Moderate	This represents a moderate risk level (3-6) and may not necessitate the implementation of supplementary action plans. Management should designate responsible individuals to routinely assess the efficacy of internal process controls
1 - 2	High	This represents a low-level risk (1-2) that may not necessitate the formulation of additional action plans. Management should designate responsible individuals within the pertinent departments to systematically monitor the associated impacts of the risk

Risk Assessment Diagram

Risk impact					
5 = Very high	5 1 x 5 = 5	10 2 x 5 = 10	15 3 x 5 = 15	20 4 x 5 = 20	25 5 x 5 = 25
4 = high	4 1 x 4 = 4	8 2 x 4 = 8	12 3 x 4 = 12	16 4 x 4 = 16	20 5 x 4 = 20
3 = Moderate	3 1 x 3 = 3	6 2 x 3 = 6	9 3 x 3 = 9	12 4 x 3 = 12	15 5 x 3 = 15
2 = Low	2 1 x 2 = 2	4 2 x 2 = 4	6 3 x 2 = 6	8 4 x 2 = 8	10 5 x 2 = 10
1 = Very Low	1 1 x 1 = 1	2 2 x 1 = 2	3 3 x 1 = 3	4 4 x 1 = 4	5 5 x 1 = 5
	1 = Very Low	2 = Low	3 = Moderate	4 = high	5 = Very high

Likelihood

Acceptable risk area

Risk Areas Requiring Management

Risk Boundary

Step 3: Review and Define Risk Indicators

Establish Key Risk Indicators (KRIs) for newly identified risks and review existing KRIs for previously identified risks. Assess the alert level, data sources, and frequency of data collection to serve as a monitoring tool for potential future risk events.

Step 4: Monitoring KRIs

Monitor KRIs at the established frequency. The Compliance and Fraud Prevention Department, in collaboration with the Risk Management Department, will collect data and summarize KRI results for monitoring and presentation to the AOT Risk Management Working Group on a quarterly basis.

Step 5: Risk Root Cause Analysis

Upon triggering a risk alert from a KRI, the Compliance and Fraud Prevention Department, in conjunction with the Risk Management Department and the risk owner, will jointly review and analyze the root cause, evaluate existing controls, and assess the risk level using the criteria specified in Step 2. This analysis will inform you about the consideration of risk management actions in Step 6.

Step 6: Risk Management

If the KRI level, post-assessment of current internal controls from the root cause analysis in Step 5, indicates a need for management as outlined in the risk map from Step 2, the risk owner is required to develop an additional risk management plan and establish targets for reducing the risk level within the acceptable area. The risk owner must also report the results of the quarterly risk management activities.

The corruption risk assessment process aligns with AOT's enterprise risk assessment process. Consequently, management has assigned the Corporate Compliance and Fraud Prevention Department, in collaboration with the Risk Management Department, to advise on the corruption risk assessment. This department compiles the outcomes of the corruption risk assessment to create the organization's corruption risk document. Additionally, it monitors the implementation of the risk management plan for presentation to the AOT Board of Directors, the AOT Risk Management Working Group, the management team, and other pertinent committees or agencies.

It is important to note that risk identification and assessment, along with the development of measures to mitigate or manage risks, are the direct responsibilities of the risk owner or the management of each organizational unit. The company must conduct an annual review of corruption risk.

5.2 Development of Business Ethics and Related Policies

AOT has implemented policies, manuals, and guidelines, including the Good Corporate Governance Manual, the Anti-Corruption Policy, the Risk Management Manual, the Fraud Risk Management Manual, the Complaint Handbook, and whistleblowing procedures. These measures ensure that AOT employees comprehend ethical principles and guidelines for effective corporate governance practices, fostering awareness, conscience, and values in managing corruption risks. All relevant policies and manuals require approval from the AOT Board of Directors or appointed representatives. Additionally, pertinent departments must conduct regular reviews and updates of these policies and manuals, at least annually, to ensure compliance with operational and legal developments. The company disseminates these operational manuals and related measures to AOT employees, subsidiaries, and external stakeholders, including the public. Employees at all levels are accountable for studying, understanding, and strictly adhering to these policies, manuals, and measures.

5.3 Communication and Training

Effective communication and training are crucial for managing corruption risk. These elements aim to enhance knowledge, understanding, and awareness of the significance of adhering to relevant policies, manuals, and guidelines, thereby fostering an organizational culture.

The responsibility for communication and training regarding overall corruption risk management at AOT resides with the Corporate Compliance and Anti-Corruption Division, in collaboration with the Corporate Communications Division (responsible for initiating communications) and the Human Resources and Administration Division (responsible for initiating training). An annual communication and training plan must be developed, detailing communication channels, types of information disseminated, target recipients, and communication frequency. This ensures that AOT employees possess the

necessary understanding and skills to comply with the Corruption Risk Management Manual.

In addition, AOT executives across various agencies (airport /unit /line /office /division /center /department) must consistently communicate about corruption risk management within their respective units. Moreover, the Corporate Compliance and Anti-Corruption Division is tasked with formulating a plan and evaluating the efficacy and efficiency of the associated communications. This evaluation will measure recipients' knowledge and understanding, as well as the effectiveness of regular communication initiatives.

5.4 Background Checks for AOT Employees and Third Parties

Background checks of employees and business associates are essential to effective fraud prevention. The Company has designated the Human Resources and Administration Division to conduct background reviews of employees prior to employment or promotion, as well as during employee interviews before resignation, to mitigate concerns regarding potential corruption within AOT. Additionally, departments responsible for external parties engaging in business with AOT (third parties) are tasked with reviewing the backgrounds of business associates prior to the initiation of contracts or transactions. This review will be conducted in accordance with applicable laws and with the consent of the employee or business associate, as appropriate.

- Reviewing employee backgrounds upon employment to verify applicant qualifications, suitability, and experience.

- Conducting background reviews prior to assignment to key positions within the company, including AOT Board members, senior executives, and finance department personnel, to assess their qualifications, experience, financial credibility, references, and potential conflicts of interest.

- Interviewing employees prior to resignation to identify any concerns regarding corruption they may have encountered during their tenure.

- Evaluating the backgrounds of business associates, particularly vendors, contractors, and service providers, to verify credibility, financial status, reputation, and qualifications related to the products or services provided, including any past conflicts of interest or corruption incidents.

Furthermore, the AOT Board, executives, and key personnel must report any potential conflicts of interest to the President and CEO annually, as well as throughout the year if any changes occur that could lead to a conflict of interest. AOT has established formal procedures for analyzing data related to AOT employees and business partners.

5.5 Internal Control

Internal control is an operational process collaboratively established by the AOT Board of Directors, executives, and all levels of the organization's employees to ensure reasonable assurance that the established procedures and operations will facilitate the achievement of organizational objectives. Consequently, internal control serves as the company's primary instrument in the anti-fraud process.

Executives in each department are required to design suitable internal controls for the processes with their oversight to manage and mitigate the fraud risks identified collaboratively in the fraud risk assessment to an acceptable level for the organization. They must also communicate, comprehend, and monitor employee operations within the department to ensure adherence to the established internal control system.

Every department must establish written operating procedures for all processes. These procedures must receive management review and approval prior to implementation. Clear segregation of duties is essential to delineate employee responsibilities in the execution of these procedures. This approach ensures transparency, independence, and the capability to prevent or detect corruption risks. All documents must be stored in a channel accessible to relevant employees and communicated to them accordingly.

Furthermore, executives in each unit should conduct regular reviews of their operating procedures or processes, at least annually or in response to significant changes affecting operations, to ensure alignment with sound internal control principles and current operational practices.

6 Fraud Detection Processes

Effective fraud prevention can mitigate the likelihood of fraud; however, AOT must implement fraud detection measures to identify and report potentially fraudulent activities promptly. Therefore, establishing a mechanism for reporting incidents or clues, as well as continuous monitoring of operations, is essential for the company to detect fraud. Fraud detection encompasses two primary activities:

6.1 Mechanism for Reporting Corruption Incidents or Tips via the Hotline

The Management has established a reliable and independent channel for reporting corruption tips, allowing both AOT employees and external parties to submit reports without disclosing their identities.

AOT employees are required to report incidents or indications of corruption through the company's designated channels. AOT will impose sanctions on any employee who is aware of or possesses information regarding potential corruption but does not inform the responsible parties. AOT has implemented measures to protect whistleblowers and related individuals to ensure that employees feel confident and secure in reporting incidents or clues related to corruption.

AOT has established the following primary channels for reporting incidents or clues:

▪ By mail: Airports of Thailand Public Company Limited, 333 Cherdwuthakat Road, Si Kan Subdistrict, Don Mueang District, Bangkok 10210 (addressed to the Director of the Compliance and Anti-Corruption Division, the President, the Director of the Audit Office, or the AOT Board of Directors)

▪ Email: anti-corruption_center@airportthai.co.th

▪ Website: www.airportthai.co.th/th/Contact Us/Report Complaints or Corruption Tips

The conditions and procedures for evaluating clues and complaints are outlined in the "Procedures for Handling Complaints or Reporting of Corruption."

The department tasked with incident or tip reporting must review and update the reporting process to ensure its relevance and communicate reporting procedures to AOT employees and pertinent parties. If the company has additional reporting channels, the

agency responsible must establish a reporting process and procedures for the individual receiving the report and regularly review and update these procedures. Additionally, the agency responsible must provide ongoing training for employees handling reports or tips, addressing procedures, confidentiality, ethical guidelines, and other pertinent policies.

In addition, those responsible for the reporting channels must create a plan and regularly conduct usability tests for the reporting mechanisms. They should also evaluate the efficiency and effectiveness of communication to measure the knowledge and understanding of the recipients, as well as the overall communication performance on an annual basis.

6.2 Auditing and Monitoring

Auditing and monitoring are critical instruments for management to assess the effectiveness and efficiency of an organization's internal controls. The Audit Office is tasked with evaluating the adequacy, suitability, efficiency, and effectiveness of these controls, offering recommendations for enhancement, and formulating controls that improve operational efficiency while mitigating potential risks, including fraud. The Audit Office must engage with the management of the audited unit to ensure a comprehensive understanding of the audit outcomes and to identify actionable strategies for strengthening internal controls. Additionally, the Audit Office presents audit findings to the Audit Committee on a quarterly basis. Each unit's management is responsible for the implementation and development of recommendations provided by the Audit Office.

Departments responsible for implementing corruption risk management measures must conduct formal self-assessments of the effectiveness and efficiency of their related operations. The results of these self-assessments, along with evidence of implementation, must be reported to the Corporate Compliance and Anti-Corruption Division at least biennially.

7. Corruption Response Processes

AOT has developed a corruption response guideline to address and mitigate the impact of corruption and prevent recurrence. The guideline encompasses internal investigations, the implementation of corrective measures to address corruption incidents, penalties and accountability, and information disclosure.

7.1 Internal Investigation

In the event of a corruption incident, the President and CEO will designate the Welfare and Labor Relations Department to assist in the investigation, inquiry, and disciplinary proceedings. The President and CEO will authorize the formation of a committee to conduct a fact-finding investigation and collect evidence for consideration regarding the validity of the complaint. Should the complaint be deemed valid, the President and CEO will sanction the formation of a disciplinary investigation committee. This committee must consist of individuals who have no affiliation with either the accused or the accuser.

The Fact-Finding Committee and the Investigation Committee operate in accordance with the "AOT Regulations on Disciplinary Actions and Punishment for Violators." Should the company find itself lacking sufficient resources or deem it appropriate to engage experts for conducting the investigation on behalf of its employees, the company may consider hiring qualified external individuals. The procurement process will follow the procedures set forth by the procurement department.

Additionally, the company considers it the duty and responsibility of all employees to cooperate in the investigation and support the work of both committees in terms of information and operations.

7.2 Establishing Remedial Measures to Address Corruption

Incidents Upon completion of the investigation, management must collaboratively evaluate remedial measures to address the corruption incident. These measures may include enhancements or expansions of company policies, improvements or expansions of internal controls, modifications to operating procedures, initiation of criminal and/or civil lawsuits, and broadening the investigation to explore other potential areas of

corruption. The departments responsible for implementing these measures must formulate a work plan that includes a timeframe for execution, which must then be presented to the CEO and implemented in accordance with the approved plan.

Remedial measures should be applied consistently to similar allegations, and the procedures must clearly specify the remedial measures for each allegation.

7.3 Determination of Penalties and Responsibilities

Upon completion of a disciplinary investigation, the Investigation Committee shall recommend disciplinary measures to the Board of Directors and the President for their consideration and approval. AOT has established disciplinary measures for violations of regulations, rules, and company policies. There are five categories of disciplinary penalties for employees and workers, classified according to the nature of the disciplinary offense.

1) Minor disciplinary offenses may result in a reprimand, salary reduction, salary deduction, or wage deduction.

2) Serious disciplinary offenses may lead to dismissal or termination.

To uphold fairness for employees, if an employee subjected to disciplinary action believes the decision is unjust, AOT permits the employee to appeal by submitting a written appeal to the supervisor one level above the person who issued the punishment or to the Appeals Committee within 30 days. The decision rendered is final.

According to AOT regulations, a supervisor who is aware of a subordinate's disciplinary offense yet fails to impose appropriate penalties or applies them improperly is deemed to have committed a disciplinary offense.

8. Reference Documents and Responsibilities for Operations

The principles or procedures outlined in this Fraud Risk Management Manual may reference existing documents prepared by AOT. In such instances, the procedures and responsibilities shall align with the referenced documents to ensure consistent operations. AOT employees with questions regarding the implementation of this manual are encouraged to seek guidance from the Corporate Compliance and Corruption Prevention Department.

9. Review and Update of the Fraud Risk Management Manual

The Fraud Risk Management Manual is governed by the Corporate Governance Committee. It will be reviewed and updated annually or whenever significant changes impact fraud risk management by the Compliance and Fraud Prevention Department. This ensures that the Manual aligns with the Company's practices and adheres to relevant regulations and laws.

Any amendments to the Fraud Risk Management Manual must receive approval from the Corporate Governance Committee, and the updated Manual will be disseminated throughout the organization.

- End of manual -