

ANTI-BRIBERY AND CORRUPTION POLICY**ANTI-BRIBERY AND CORRUPTION POLICY****1. Short Title, Definitions, and Application**

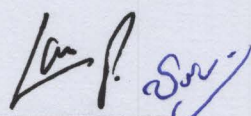
This Policy shall be referred to as the Shinawatra University Anti-Bribery and Anti-Corruption Policy 2023.

1.1 Definitions

Bribery encompasses actions such as offering, promising, giving, demanding, or accepting any advantage to influence an illegal, unethical, or trust-breaking action. The legality of such actions is determined by the laws and regulations applicable in the countries where a Member Organization operates, as well as any additional laws or regulations that may apply due to collaboration with other Member Organizations. Corruption involves the misuse of public office or power for personal gain or the misuse of private power in non-governmental business contexts. Acts of bribery or corruption aim to sway individuals in their duties, leading them to act dishonestly. This Policy applies regardless of whether the recipient works in the public or private sector, as bribery and corruption are prohibited in both cases. Those targeted for bribery are typically individuals capable of influencing business acquisition, retention, or direction, whether through sales activities like tendering and contracting or through administrative tasks. The timing of bribery relative to contract tendering or task completion is irrelevant.

1.2 Application

Shinawatra University (SIU) is fully committed to conducting all academic, administrative, and commercial operations in a lawful and ethical manner, unequivocally rejecting any acts of bribery or corruption by its staff or associates across all jurisdictions. The University pledges to uphold professionalism and





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fairness in its business practices, implementing robust systems to combat bribery and corruption effectively.

The Shinawatra University is dedicated to conducting business ethically and honestly, implementing systems that foster an anti-bribery atmosphere within the institution. The University maintains a zero-tolerance stance towards bribery and corrupt activities and is committed to conducting its academic and non-academic activities on campus or in business dealings with external entities professionally, fairly, and with integrity.

The University is obligated to comply with all laws of Thailand, including the Acts related to bribery and corruption.

This Policy is adopted by the University, which bears overall responsibility for ensuring its compliance with legal and ethical obligations and ensuring that everyone at the University adheres to it.

2. Objective

The University will comply with all laws aimed at combating bribery and corruption in all the jurisdictions where it operates. However, it is subject to Thai laws regarding its conduct, both domestically and internationally. The objectives of this Policy are as follows:

- To delineate the University's obligations, as well as those of its employees, in adhering to and upholding the University's stance on bribery and corruption.
- To furnish information and guidance to University personnel on identifying and addressing issues related to bribery and corruption.

This Policy applies to all members of the University, regardless of their location, concerning their activities for or on behalf of SIU or otherwise related to SIU activities.



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This Policy undergoes regular reviews and is disseminated to all individuals within our organization to secure their commitment. Any violation of this Policy will be treated seriously and may result in disciplinary action.

3. Responsibilities and Consequences of Non-Compliance

All SIU personnel and third-party representatives must familiarize themselves with and adhere to this Policy. Any actual or suspected violations must be promptly reported to SIU's Registrar (Legal Department).

Heads of Institutions are responsible for ensuring that their subordinates understand and comply with this Policy and relevant Anti-Bribery and Anti-Corruption Laws. Violations of this Policy by SIU personnel may lead to disciplinary measures, including termination of employment, and could also result in legal consequences such as prosecution, fines, or imprisonment as per applicable laws. Third-party representatives found in breach of this Policy may face contract termination and severance of business relations with SIU.

4. Procedure/Practices

4.1 Principles

- Do not offer money, gifts, hospitality, or any form of advantage to individuals if it is known or suspected that such actions may lead to misuse of their position or improper performance of their duties.
- Avoid leveraging one's position to gain personal or third-party benefits, including financial incentives, gifts, or hospitality.
- Do not provide money, gifts, hospitality, or any form of payment with the intent of influencing individuals to secure business opportunities or advantages for the University.

4.2 Gifts and Hospitality

Modest gifts and reasonable hospitality are not prohibited under this Policy, provided certain rules and requirements are met. All staff should adhere strictly to



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the following guidelines in respect of gifts, hospitality, and entertainment:

- Never offer, promise, or give a gift, hospitality, or entertainment where this may be construed as a bribe or be otherwise improper.
- Never request, agree to, or accept a gift, hospitality, or entertainment where this may be construed as a bribe or be otherwise improper.
- Never offer, promise, or give a gift, hospitality, or entertainment to a public official where this may be construed as a bribe or an attempt to influence the public official in his/her official capacity.
- For gifts, hospitality, and entertainment, staff need to obtain prior approval from the competent authorities before accepting or offering gifts, hospitality, and entertainment of a certain level or involving categories of recipients.

4.3 Sponsorships

Sponsorships are closely allied to the various types of community/academic activities undertaken by the university. These could range from sponsoring educational scholarships to local sports teams. Any sponsorship must be for genuine business or charitable objectives without any element of quid pro quo. Any such sponsorship must be transparent, duly approved by the competent authority, and properly documented in the record.

5. How to Raise a Concern

Everyone is encouraged to raise concerns about any issue or apprehension of bribery or corruption at the earliest possible stage. If anybody is unsure whether a particular act constitutes bribery or corruption, or if there are any other queries, these should be raised with Heads of Institutions in the first instance. If there is still any query, the Registrar's Office should be contacted for further guidance.



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6. Protection

If anybody refuses to accept or offer a bribe or reports a concern relating to potential act(s) of bribery or corruption, the University understands that he/she may feel worried about potential repercussions. The University will support anyone who raises concerns in good faith under this Policy, even if any subsequent investigation finds that they were mistaken.

The University will ensure that no one suffers any detrimental treatment because of refusing to accept or offer a bribe or other corrupt activities or because they reported a concern relating to potential act(s) of bribery or corruption.

Detrimental treatment refers to dismissal, disciplinary action, threats, or unfavorable treatment in relation to the concern the individual raised.

If anybody has reason to believe that he or she has been subjected to unjust treatment because of a concern or refusal to accept a bribe, the matter should be informed to the Heads of Institutions immediately.

7. Record Keeping

The University will keep detailed and accurate financial records and will have appropriate internal controls in place to act as evidence for all payments made. The University will declare and keep a written record of the amount and reason for hospitality or gifts accepted and given, and understand that gifts and acts of hospitality are subject to managerial review. Where payments are made to third parties, the legitimate business reason for such payments must always be clearly recorded.

The University must ensure all expense claims relating to gifts, hospitality, or entertainment, or expenses incurred by third parties, are submitted in accordance with the relevant travel and expenses Policy then in force at the University, in each case specifically record the reason for the expenditure.

8. Resources and Responsibilities

Allocate adequate resources, including financial, technological, and human resources, to support the implementation of the Policy and strategy.

Designate a committee responsible for overseeing the implementation, monitoring, and reporting of anti-bribery and anti-corruption initiatives. The committee constitution for the Policy is as follows:

Nominated by the Vice-President, SIU	Chairperson
Two Deans	Member
Two Head of Institutions	Member
Two Professors	Member
Two Asst. Professors	Member

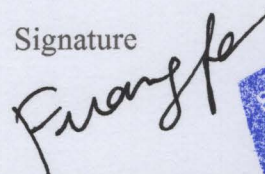
9. Approving Authority

The Vice-President of Shinawatra University (SIU) shall be the approving authority for implementing actions related to bribery and corruption on campus.

10. Review of the Policy

The Policy shall be reviewed periodically to ascertain the effectiveness of the implementation of anti-bribery and anti-corruption practices.

Signature



(Dr. Fuangfa Ampornstira)

On behalf of the President of Shinawatra University

Date: August, 1 2023

