

# Anti-Bribery Policy Statement Bangkok Telecom & Thai Fiber Optics Co.,Ltd.

Established March 1, 2013

### 1. Background and Statement

The Furukawa Electric Group has always been committed to anti-bribery compliance throughout its management and operations, and we are continuously determined that the group-wide management of bribery risks is of the utmost importance. However, anti-bribery laws are recently being strengthened internationally and government agencies are increasingly active on their enforcements.

To be emphasized that it is Furukawa's policy, as is clear from our CSR code of conduct. Bangkok Telecom Co., Ltd. And Thai Fiber Optics Co., Ltd. Have to comply with all applicable anti-bribery laws, including but not limited to, the US Foreign Corrupt Practices Act, the UK Bribery Act, the Japanese Unfair Competition Law and all applicable local laws where the company operates, to fully prevent giving and taking of bribery throughout our operations and maintain the integrity of our business.

To be supplemented the company code of conduct and company community social responsibility policy which had been announced to all employee. On behalf of Bangkok Telecom & Thai Fiber Optics Co., Ltd., would like to express our intention to be complied with the anti-bribery policy same as Furukawa Electric Group as the following policy scope.

#### 2. Definitions

"Government Officials" are all public officials, political parties and candidates, including government owned or controlled companies (employees and executives of government owned banks, doctors and researchers of public hospitals, engineers and their delegates of government owned oil companies, etc.).

"Agents" are persons or entities who perform transactions by procuration or perform intercessions or mediations of transactions on behalf of the Bangkok Telecom & Thai Fiber Optics.

"Business Partners" are persons or entities with which the Bangkok Telecom & Thai Fiber Optics does business.

"Bribe" is anything of value to a Government Official or other person, with the intent to obtain or retain business or gain an improper advantage. It includes facilitation payments.

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### 3. Requirements

Bangkok Telecom & Thai Fiber Optics requires that all its Directors, Employees, Agents and Business Partners:

- 1. Do not give, offer, promise, accept or demand, directly or indirectly, anyone a bribe.
- 2. Ensure that payments to Government Officials are made according to adequate approval procedures and are reviewed appropriately.
- 3. Are fully aware of, and comply with the applicable anti-bribery laws and the Furukawa policy through training programs and communication of the policy. Directors, Employees, agents and Business Partners are furthermore required to declare compliance to applicable anti-bribery laws and Bangkok Telecom & Thai Fiber Optics policy.
- 4. Engage only with legitimate and transparent Agents and Business Partners, after performing adequate due diligence procedures on the Agent or the Business Partner. 5. Regularly assess Bribery Risks concerning the business of the company.
- 6. Maintain record keepings and financial controls to enable demonstration of compliance with anti-bribery laws and the Bangkok Telecom & Thai Fiber Optics policy.
- 7. Regularly review and update its policy and controls where necessary to prevent bribery.
- 8. Promptly report any suspected violations of the applicable anti-bribery laws or the Furukawa Electric Group policy by any of the Group's Directors, Employees, Agents or Business Partners, so that any violations or suspected violations are dealt with timely.

The anti-bribery policy, company measurement or procedure as well as the other law as according to our anti-bribery applies to all directors, employee, agents and business partners of Bangkok Telecom & Thai Fiber Optics. All individual engagement needs accountably and acknowledge policy in accordance. Any uncompliance will be considered for penalty. If any uncertainty arises, or if an employee knows of any conduct that the employee believes is improper, the employee should raise the issue with his or her manager and top management.

The anti-bribery improvement plan to prevent bribe at the company business operation and each of department's involved work process have been declared and control by existing CSR. Committee. All manager will be assigned to cooperate the anti-bribery improvement plan implementation which have been approved by President then summarize and report plan progress and result to Management Meeting in timely.

Eijí Kinoshita

President