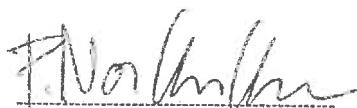


Anti-Bribery and Anti-Corruption

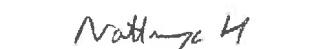
Boutique Corporation Public Company Limited

Date: 1 November, 2018



Prepared by: Pornpimol Chaichanakajorn

Senior Vice President – HR Business Partner



Review by: Nattaya Huatsoontorn

Chief Financial Controller



Approved by: Prabsharan Singh Thakral
President and Group CEO

Boutique Corporation Public Company Limited

Since its inception in 2004, Boutique Corporation Public Company Limited (the “Company”) has kept expanding and diversifying its portfolio, from hospitality to commercial spaces, and will keep doing so in the future with many new projects in the pipeline. It has remained committed to consistently delivering high quality, value-adding projects, and on-time and with superior benefits for all stakeholders.

Our international team brings together a formidable and diverse mix of skill sets and experience from construction management, real estate asset management, hospitality, real estate and finance, which enables the Company to be on the cusp of the latest trends in the industry and to create and deliver innovative solutions. The people at Boutique Corporation Public Company Limited are driven by the Company’s core values: speed, value maximization, transparency and integrity, respect, and a true passion for entrepreneurship, which enable the Company to practice creative thinking and implement game changing techniques.

Anti-Bribery and Anti-Corruption

The objective of the anti-Bribery and anti-Corruption policy is

- To ensure that appropriate anti-Bribery and anti-Corruption procedures are in place
- To provide employees with a clear set of guidelines
- To ensure that our staff conducts its activities in an ethical and appropriate manner as well as complying with the laws and regulations

What is Bribery?

is defined as offering, promising, agreeing to receive or giving of payment or another advantage to induce or reward improper conducts or activities in exchange for personal gain or benefit.

What is Corruption?

- Corruption means a dishonest or illegal fraudulent conduct by those in power, such as government officers, management or responsible persons.
- Corruption can be defined as the abuse of entrusted power or position by an authorized person for personal gain or benefit.
- Corruption may include activities such as “bribery”, “embezzlement”, “theft” and “fraud”.

What is Embezzlement and theft?

Involves someone with access to funds or assets illegally taking control of them.

What is fraud?

Involves someone using deception to convince the owner of funds or assets to give them up to an unauthorized party.

Role and Responsibility of board of directors, executives, and employees of the Company

- shall operate its business on transparency
- shall operate its business on accountability
- shall comply with laws on anti-bribery and anti-corruption
- shall comply with the anti-bribery and anti-corruption policy of the Company
- must not accept or involve with any course of bribery or corruption in direct or indirect manner
- shall report on any actions involving with bribery or corruption
- Management and the Board of Directors must support and promote the anti-bribery and anti-corruption policy
- The Company shall perform an annual assessment as a form of good corporate governance on compliance the anti-bribery and anti-corruption policy and related matter to the Audit and Corporate Governance Committee for their consideration.

Reporting Channel

Employees are encouraged to report known or suspicious violations such as theft, fraud, corruption, bribery or similar illegal act at any time to:

1. Direct Supervisor; or
2. Senior Management; or
3. Ethics Counselor Committee under Whistleblowing policy which consists of the Audit Committee, Head of Internal Audit and Head of Legal

Email: wbcontact@boutiquecorporation.com

Hotline number: 02-620-8713

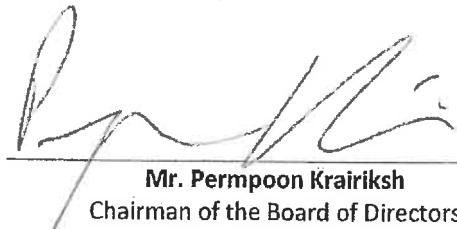
The reporter and the report shall be protected and kept confidential and investigation shall be conducted accordingly.

Disciplinary Actions

Considering the seriousness nature of the corruptions.

1. Suspension without pay
2. Loss or reduction of merit increase or bonus
3. Termination of employment

Approved by:



Mr. Permpoon Krairiksh
Chairman of the Board of Directors
Date: 1 November 2018



Mr. Prabsharan Singh Thakral
President and Group CEO
Date: 1 November 2018