

FELICIA DESIGN ANTI-CORRUPTION POLICY

1. Policy Statement

1.1 It is Felicia's policy to conduct all of its business in an honest and ethical manner. We take a zero-tolerance approach to Bribery and Corruption and are committed to acting professionally, fairly and with integrity in all our business dealings and relationships wherever we operate and to implementing and enforcing effective systems to counter bribery.

1.2 We will uphold all laws relevant to countering bribery and corruption in all the jurisdictions in which we operate. We remain bound by local and national laws.

2. Scope

2.1 This policy applies to all directors, managers, employees, associates such as consultants, contractors, or any other person or company associated with us (including third parties), and shall be communicated to them at the outset of our business relationship and as appropriate thereafter. For simplification, in this policy the term "employees" refers to all the above persons.

2.2 This policy applies in all countries or territories where this company operates.

3. Definition of Bribery

3.1 Bribery refers to the act of offering, giving, promising, asking, agreeing, receiving, accepting, or soliciting something of value, or of an advantage, so to induce or influence an action or decision.

3.2 A bribe refers to any inducement, reward, or object/item of value offered to another individual in order to gain commercial, contractual, regulatory, or personal advantage.

3.3 Bribery is not limited to the act of offering a bribe. If an individual is on the receiving end of a bribe and they accept it, they are also breaking the law.

3.4 Bribery is illegal. Employees must not engage in any form of bribery, whether it be directly, passively (as described above), or through a third party (such as an agent or distributor). They must not bribe a public official anywhere in the world. They must not accept bribes in any degree and if they are uncertain about whether something is a bribe or a gift or act of hospitality, they must seek further advice from the Compliance Manager, Khun Wanida Treejittanachai.

4. Gifts, Invitations and Hospitality

4.1 This policy does not prohibit normal and appropriate gestures of goodwill (given and received) to or from Third Parties.

4.2 You are prohibited from accepting a gift or giving a gift in the following situations:

- (a) it is made with the intention of influencing to obtain or retain business, to gain a business advantage, or to reward the provision or retention of business or a business advantage, or in explicit or implicit exchange for favors or benefits;
- (b) it is given in your name and not in the name of the Company;
- (c) it includes cash or a cash equivalent (such as gift certificates or vouchers);
- (d) it is of an inappropriate type and value and given at an inappropriate time (e.g. during a tender process); and
- (e) it is given secretly and not openly.

4.3 We appreciate that the practice of giving business gifts varies between countries and regions and what may be normal and acceptable in one region may not be in another. The test to be applied is whether in all the circumstances the gift or hospitality is reasonable, justifiable and is proportionate. The intention behind the gift should always be considered. If there is any uncertainty, the advice of the Compliance Manager should be sought.

4.4 As stated in section 3.6 of the Employee Handbook, employees are not allowed to accept personal gifts worth more than Baht 300; meals, refreshments, and entertainment that are expensive or frequent.

5. Facilitation Payments and Kickbacks

5.1 We do not make, and will not accept, Facilitation Payments or Kickbacks of any kind anywhere in the world.

5.2 Where the facilitation payment is being extorted or you are being coerced to pay it and your safety or liberty is under threat or you feel you have no alternative but to pay for personal or family peace of mind, then pay the Facilitation Payment and report this to your manager and/or the Compliance Manager as soon as possible.

6. Contributions and Donations

Charitable contributions and donations must be according to company rules and must not be connected with any bribery. Our company does not make any political donations and does not support any political party.

7. Your Responsibilities

7.1 If this policy applies to you, you must ensure that you read, understand, and comply with this policy, with the rules contained in the Employee Handbook, and with any training or other anti-bribery and corruption information you are given.

7.2 It is your responsibility to ensure that all accounts, invoices, memoranda and other documents and records relating to dealings with clients, suppliers, government officials, and business contacts, are prepared and maintained with strict accuracy and completeness. No accounts must be kept 'off the books'.

7.3 You must declare all Gifts, Invitations & Hospitality, etc., accepted or offered, according to company practice. The Incoming and Outgoing Gifts and Gift Registers are held by HR and Finance, and are subject to managerial review.

7.4 All employees and associated parties are equally responsible for the prevention, detection, and reporting of bribery and other forms of corruption. They are required to avoid any activities that could lead to, or imply, a breach of this anti-bribery policy.

7.5 If you have reason to believe or suspect that an instance of bribery or corruption has occurred or will occur in the future, you must notify the Compliance Manager, Khun Wanida Treejittanachai, at wanida@feliciadesign.com or via mail at the following address:

Felicia (Thailand) Ltd.
S&B Tower
9th Floor
68-68/6 Pan Road,
Bangkok 10500
Thailand

7.6 If any employee breaches this policy, they will face disciplinary action up to and including dismissal. This company has the right to terminate a contractual relationship with an employee or an associate if they breach this anti-bribery policy.

8. Protection

8.1 If you refuse to accept or offer a bribe or you report a concern relating to potential act(s) of bribery or corruption, you may feel worried about potential repercussions. This company will support anyone who raises concerns in good faith under this policy, even if the investigation finds that they were mistaken. This is also stated in section 2.6 of the Employee Handbook.

8.2 We will ensure that no one suffers any detrimental treatment as a result 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, treats, or unfavorable treatment in relation to the concern the individual raised.

8.3 If you have reason to believe you've been subjected to unjust treatment as a result of a concern or refusal to accept a bribe, you should immediately submit a complaint as described in section 2.5 of the Employee Handbook, and/or inform the Compliance Manager, or any other senior manager.

9. Additional Considerations

9.1 The Office of Human Resources will take into account this Anti-Corruption Policy in recruitment, orientation, training and the yearly evaluation of performance of all employees.

9.2 Employees must ensure that all company associates, such as consultants, contractors, or any other person or company associated with us (including third parties), will follow this policy when dealing with all government agencies and government officers.

9.3 The Managing Director will review and communicate this policy to employees and to significant business partners at least once a year.

10. Monitoring and Review

10.1 The Compliance Manager is responsible for monitoring the effectiveness of this policy and will review the implementation of it on a regular basis. They will assess its suitability, adequacy, and effectiveness and report all findings to the Managing Director.

10.2 Internal control systems and procedures designed to prevent bribery and corruption are subject to regular audits to ensure that they are effective in practice.

10.3 Any necessary improvement will be applied as soon as possible. Employees are encouraged to offer their feedback on this policy if they have any suggestions for how it may be improved. Feedback of this nature should be addressed to the Compliance Manager.

10.5 This policy does not form part of an employee's contract of employment and it may be amended at any time to improve its effectiveness at combatting bribery and corruption.

Updated on: 17 May 2022

Approved by: Vibeke Lyssand Leirvag
Managing Director