



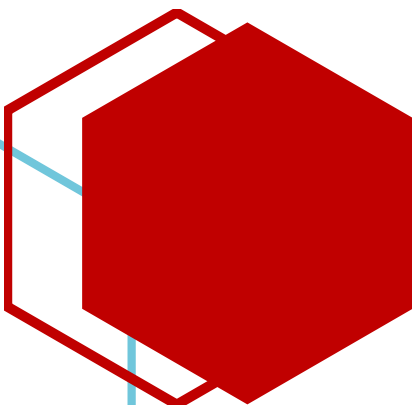
Self-Evaluation Tool for Anti-Corruption System Development

Version 4.0

Thai Private Sector Collective Action Against Corruption (CAC)

July 10, 2020

This Self-Evaluation Tool, or 71 Checklists, is designed for large companies to help develop standardized anti-corruption system and obtain CAC certification.



Introduction

The Self-Evaluation Form for anti-corruption system development version 4.0 was prepared in 2020 by the Thai Private Sector Collective Action Against Corruption (CAC), under the support of the Thai Institute of Directors Association (IOD). This is an upgrade from the 2.1 version of Self-Evaluation Tool, based on the 241 checklists developed by Transparency International. The modification is meant to ensure that it fits with the Thai context and can be used by Thai private companies to assess their anti-corruption systems.

The main purpose of the Form is to help companies strengthen and examine their anti-corruption policies, corruption risks assessment, internal controls, personnel, communications, whistle blowing channels, and system improvement. These will lead to creation of immunity against corruption risks and at the same time enhancing corporate transparency.

Key similarities and differences between the 2.1 and 4.0 version are as follow:

1. Number of the checklist remains at 71
2. Companies are required to respond with 'yes' in the entire 71 checklists while some in the 2.1 version are not mandatory.
3. Companies may opt to use CAC's risk assessment template, which has better clarity than that of the 2.1 version.
4. 17 of 71 checklists in the 2.1 version were replaced with new ones concerning
 - Facilitation Payment
 - Political Contribution
 - Revolving Door
 - Conflict of Interest
 - Monitoring and Review

The CAC would like to express our gratitude to the following organizations for providing resourceful comments and taking parts in the development of the 4.0 version to ensure the completeness of the Self-Evaluation Tool revision.



About CAC

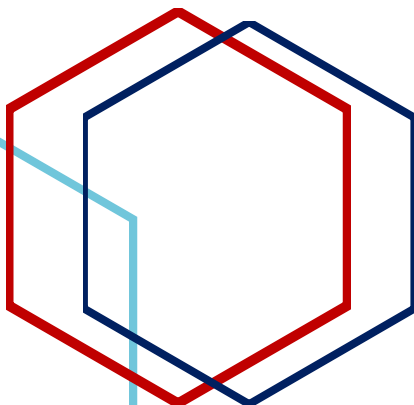
Thai Private Sector Collective Action Against Corruption (CAC) is an initiative by the Thai private sector to take parts in tackling corruption problem via collective action. The CAC aims to bring effective anti-corruption policy and mechanism into corporate implementation in order to create an ecosystem of bribe-free business community.

The CAC was founded in 2010 by the support of the country's eight leading organizations in the private sector including the Thai Chamber of Commerce, the Joint Foreign Chambers of Commerce in Thailand, the Thai Listed Companies Association, the Federation of Thai Industries, the Federation of Thai Capital Market Organizations, the Thai Bankers' Association, the Tourism Council of Thailand, and the Thai Institute of Directors Association (IOD). The IOD also serves as secretariat and takes a leading role in driving the initiative.

Following the signing of UN Convention against Corruption (UNCAC) by the Thai government in 2003, the CAC establishment has been in alignment with the National Anti-Corruption Strategy drafted by the National Anti-Corruption Commission (NACC) and the CAC has constantly won support from the Government and the NACC right from the start. The first joint meeting between the public and private sectors to lay foundation of the CAC was held on July 29, 2010.

The CAC's operations are sponsored by the U.K. Prosperity Fund, the U.S.-based Center for International Private Enterprise (CIPE), Thai CG Funds, and a number of Thai private companies.

Thai Private Sector Collective Action Against
Corruption (CAC)
Thai Institute of Directors Association (IOD)
3rd floor Capital Market Academy Building 3, 2/9
Moo 4 Northpark Project,
Thung Song Hong, Laksi, Bangkok 10210
Tel: 02 955 1155 Fax: 02 955 1156
Email: cac@thai-iod.com



About the Self-Evaluation Form

The CAC's Self-Evaluation Tool is designed to support the application to become CAC certified member voluntarily. The Form is based partly on Transparency International's Business Principles for Countering Bribery, first published in 2002 and eventually revised in 2012.

In the making of the Business Principles for Countering Bribery, Transparency International had discussed with various stakeholders including representatives from companies, business associations, trade associations, NGOs, and advisers. Therefore, the CAC would like to encourage companies to use this Tool as a starting point to develop their own anti-corruption system or as a tool to compare with their existing practices.

The CAC emphasizes the following matters in considering the Self-Evaluation Tool for certification application:

1. The company has completed the Form and responded with "yes" in the entire checklist.
2. The clarity of reference documents that indicate the completeness of what the company has done.
3. The official support from top executives including Chairman, Board of Directors (Board), and Chief Executive Officer.
4. Actual implementation of measures, policies, guidelines, training, and communications (both internally and externally) in accordance with the company's context and applicable corruption risks.
5. The existence of internal audit system and Working Paper (for companies that have been certified from the third time onwards).

Companies should prepare and submit only reference documents relevant to corruption issues. They may include policy, handbook, work plan, meeting minutes, and announcement related to "issues being evaluated" concerning anti-corruption and bribery. There is no need to submit documents irrelevant to anti-corruption activities or measures to the CAC.

Self-Evaluation Form's Terms of Use

The CAC will not be held responsible for any damage that may occur from the use of Self-Evaluation Tool. The company will be accountable for the accuracy, completeness, and appropriateness of information provided in the Self-Evaluation Tool. Therefore, users of the Self-Evaluation Tool must possess proficiency and be properly advised in using the Tool.

The CAC will not disclose nor distribute information provided in the Self-Evaluation Tool prepared by the company unless a written consent has been granted by the company.

Certification Process

After signing Declaration to join CAC, company has 18 months from the signatory date to prepare and apply for CAC certification. Once the company is ready to submit its application, it should take the following steps:

1. Have the company's Audit Committee audited all information provided in the Self-Evaluation Tool and have the Chairman of Audit Committee signed the Form. In case the company does not have Chairman of Audit Committee;
 - 1.1 Have the company's auditor assessed the Self-Evaluation Tool and issued report to the Chairman of the Board.
 - 1.2 Appoints another auditor to assess the Self-Evaluation Tool and issued report to the Chairman of the Board. The appointed auditor must be registered with the Securities and Exchange Commission (SEC).
2. Have Chairman of the Board and Chief Executive Officer signed the Self-Evaluation Form.
3. Submits original documents listed in the Annex, the Self-Evaluation Form and reference documents for each checklist in Adobe PDF files as well as risk assessment table in Microsoft Excel file in a Flash Drive, and auditor's report (if any) to the CAC at

Thai Institute of Directors Association
CAC Certification
3rd floor Capital Market Academy Building 2, 2/9 Moo4 Northpark Project,
Thung Song Hong, Laksi, Bangkok 10210
Tel: 0-2955-1155

4. The CAC will accept application until the last day of each quarter (March 31, June 30, September 30, and December 31). It will compile documents of companies seeking certification for the quarter and propose to the CAC Council for consideration. The CAC will announce the certification result on the last day of the following quarter.
5. If a company fails to secure certification in the first attempt, it can revise the documents and re-submit applications within six months from the day the 18-month window expired. Company seeking re-certification should submit application six months before the certified status expires.
6. The CAC Council reserves the rights to summon companies to provide additional information and/or refusal of the certification in accordance with the CAC's principles (downloadable at https://www.thai-cac.com/en/resource_post/cac-principals-thai-version/)

Annex

Checklists of documents before CAC submission

- The company has requested certification invoice (THB 8,000) from the CAC
- The company has made the payment and sent pay-in slip via e-mail to cac@thai-iod.com

The company has prepared to submit the following documents to CAC

- Signed original documents in this annex (pages 6 and 7)
- The Self-Evaluation Form (pages 8-23) and reference documents for each checklist in Adobe PDF files and risk assessment table in Microsoft Excel file in a Flash Drive. (Do not submit the hard copy of reference documents).
- Auditor's report (if any)

Submission address

Thai Institute of Directors Association
CAC Certification
3rd floor Capital Market Academy Building 2, 2/9 Moo4 Northpark Project,
Thung Song Hong, Laksi, Bangkok 10210
Tel: 0-2955-1155

Remark: The CAC reserves the right to reject reference documents submitted in the hardcopy format.

Approval of Self-Evaluation Form submission

To: Thai Private Sector Collective Action Against Corruption (CAC) Council,

The company's Board of Directors has considered and resolved to submit information concerning the Self-Evaluation Form to the Thai Private Sector Collective Action Against Corruption (CAC) Council in a bid to enter the certification process. The Board acknowledged that the CAC Council has the right to change status of juristic persons in the CAC network including those declared their intentions to join CAC and CAC certified members. The change in status binds with the rights to use CAC symbol and the expression of CAC status through various channels. The expression and adjustment of CAC status of juristic person may affect status of that juristic person conducted by other agencies that rely on the CAC status.

| | |
|---|--|
| Company name | |
| Chairman of the Board | |
| Signature | |
| Chief Executive Officer | |
| Signature | |
| Self-Evaluation Form approval date | |

Auditing Self-Evaluation Form

In order to audit the completion and accuracy of the Self-Evaluation Form and all reference documents, the Company has assigned (please check only one choice)

- Company's auditor to audit the Form and reference documents (please submit auditor's report to the CAC along with the Self-Evaluation Form)
- other auditor, registered with the Securities and Exchange Commission, to audit the Form and reference documents (please submit auditor's report to the CAC along with the Self-Evaluation Form)
- the Company's Audit Committee to audit the Form and reference documents (please have the Chairman of the Audit Committee signed below)¹

To: Thai Private Sector Collective Action Against Corruption (CAC) Council,

The Company's Audit Committee has conducted proper and adequate procedures to audit the appropriate compliance with the Self-Evaluation Form concerning anti-corruption measures. The Audit Committee hereby reassures that information provided in this Self-Evaluation Form is accurate and sufficient for submission to the Thai Private Sector Collective Action Against Corruption (CAC) Council for entering the CAC certification process.

| | |
|--|--|
| Company name | |
| Chairman of Audit Committee | |
| Signature | |
| Self-Evaluation Form Audit Date | |

¹ For listed companies, Audit Committee refers to definition stipulated by the Securities and Exchange Commission's Regulation No. กสศ.ภ.(ว.) 32/2551 that audit committee must consist of at least three members, all of which must be independent directors. For non-listed companies, the person who signs on behalf of the audit committee must be Non-Executive Director.

Company details

| | |
|---|--|
| Company name | |
| Business Characteristics | |
| <p style="text-align: center;"> <input type="checkbox"/> Listed on SET <input type="checkbox"/> Listed on MAI <input type="checkbox"/> Other </p> <p> Abbreviation _____ (according to SET or MAI) </p> <p> Sector _____ (according to SET or MAI) </p> | |
| Coordinator name (1): | |
| Position: | |
| Address: | |
| Email: | |
| Tel: | |
| Mobile: | |
| Coordinator name (2): | |
| Position: | |
| Address: | |
| Email: | |
| Tel: | |
| Mobile: | |

Self-Evaluation Form for Anti-Corruption System Development

Version 4.0

| Checklist No. | Issues to evaluate | No | In progress | Yes | Reference (Name of documents/page) |
|--|--|--------------------------|--------------------------|--------------------------|---------------------------------------|
| Section 1 – Corruption Risks | | | | | |
| 1 | The Company has conducted corruption risk assessment. In case the Company is a Holding Company, it should also assess corruption risks of at least one core subsidiary on top of corruption risk assessment of the holding itself. | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| Section 2 – Internal Control for Corruption Risks | | | | | |
| 2 | The Company's Internal Control has effective Operating Controls to prevent each corruption risk listed in the Risk Assessment Form. | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| 3 | The Company's Internal Control has effective Control Environment to prevent each corruption risk listed in the Risk Assessment Form. | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| Section 2.1 – Financial Controls | | | | | |
| 4 | The Company's Internal Control has effective Financial Controls for proper and adequate prevention of corruption risks. | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |

| Checklist No. | Issues to evaluate | No | In progress | Yes | Reference (Name of documents/page) |
|--|---|--------------------------|--------------------------|--------------------------|------------------------------------|
| 5 | The Company has procedures to ensure that all financial transactions are duly booked on its account without unrecorded, unexplainable, or falsely booked transaction. | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| 6 | The Company has procedures to store documents and notes properly to ensure they are available for the examination of accuracy and appropriateness of financial transactions. | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| 7 | The Company assured it has proper segregation of work duties. | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| Section 2.2 – Monitoring and Auditing | | | | | |
| 8 | The Company has Audit Committee or other committee to monitor risk and internal controls concerning anti-corruption, with a task to conduct audit report to inform the Board of Directors on a regular basis. | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| 9 | The Company has audited to ensure that financial recording procedures have robust Internal Controls and adequate documents for auditing. | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |

| Checklist No. | Issues to evaluate | No | In progress | Yes | Reference (Name of documents/page) |
|--|---|--------------------------|--------------------------|--------------------------|---|
| 10 | The Company has Internal Audit procedures to ensure the accounting process and information storage has Internal Controls and adequately. | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| 11 | The Internal Audit Department, or person in charge of designing Internal Controls and Internal Controls improvement, has sought comments or arranged internal meetings about Internal Controls or operating procedures concerning activities prone to corruption risk with the risk owner or departments relevant to such activities. | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| 12 | The Company has procedures to urgently report issues found in the Internal Audit process to senior management and the Board of Directors. | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| Section 2.3 - Support Functions | | | | | |
| 13 | The Company has Internal Audit process to probe sales and marketing procedures prone to corruption risk on a regular basis and arranges to fix any mistake properly. | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |

| Checklist No. | Issues to evaluate | No | In progress | Yes | Reference (Name of documents/page) |
|---|---|--------------------------|--------------------------|--------------------------|---|
| 14 | The Company has Internal Audit process to probe procurement and contract signing procedures, particularly those prone to corruption risk and arranges to fix any mistake properly. | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| 15 | The Company has set up a unit or appointed a qualified person to ensure and monitor the implementation of anti-corruption measures | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| Section 3 - Anti-Corruption Principle & Policy | | | | | |
| Section 3.1 - Anti-Corruption Policy | | | | | |
| 16 | The Company has written anti-corruption policy, signed by Chairman of the Board or senior management, with adequate details that would lead to effective implementation. | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| 17 | The Company has set clear definition of corruption, covering all forms of corruption that could derive from abuse of power. (For examples, gift or service, cash or cash-substitute items, bribe payment to government officials and corruption between private organizations.) | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |

| Checklist No. | Issues to evaluate | No | In progress | Yes | Reference (Name of documents/page) |
|----------------------|--|--------------------------|--------------------------|--------------------------|---|
| 18 | The Company has stipulated that all personnel, including directors, must comply with the policy with no exception and has regulations for management and staffs to refrain from asking for, processing, or accepting bribe for the benefits of their own, family, friend, or acquaintance. | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| 19 | The preparation or revision of anti-corruption policy has been officially approved by the Board of Directors. | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| 20 | The Company has officially appointed the Board of Directors, or a committee appointed by the Board of Directors, to ensure compliance of anti-corruption measures. | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| 21 | The Company has indicated roles and responsibilities of directors and senior management in implementing anti-corruption measures within the organization. | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| 22 | The Company has indicated penalties for director who violates anti-corruption measures and such penalties must be fair in comparison with those applied for staffs. | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |

| Checklist No. | Issues to evaluate | No | In progress | Yes | Reference (Name of documents/page) |
|---|---|--------------------------|--------------------------|--------------------------|------------------------------------|
| Section 3.2 – Procedures to Support the Policy | | | | | |
| 23 | The Company has Code of Conduct or similar policy that indicated clear anti-corruption guidelines. | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| 24 | The Company has prepared guidelines/operating procedures for transactions prone to corruption risk (such as political contributions, donations, sponsorship, gift and hospitality, and other expenses) in accordance with anti-corruption policy and the guidelines/operating procedures also included robust internal controls, adequate proof, and proper storage of documents. | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| 25 | Policies and operating procedures to support anti-corruption policy have been approved by the Board of Directors or person assigned by the Board of Directors. | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| Section 3.3 - Gift and Hospitality | | | | | |
| 26 | The Company has written policy on gift and hospitality that is in alignment with anti-corruption policy. | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |

| Checklist No. | Issues to evaluate | No | In progress | Yes | Reference (Name of documents/page) |
|----------------------------------|--|--------------------------|--------------------------|--------------------------|---|
| 27 | The Company has set clear definition of gift and hospitality. | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| 28 | The Company has steps, controls, and reporting procedures to ensure strict compliance of gift and hospitality policy | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| 29 | The Company has audits to ensure that it does not use gift and hospitality as channel to facilitate corruption. | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| Section 3.4 – Sponsorship | | | | | |
| 30 | The Company has written policy on sponsorship that covers money, items, and any other form of sponsorship. | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| 31 | The Company has set clear definition of giving and receiving sponsorship. | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| 32 | The Company has steps, controls, and reporting procedures to ensure strict compliance of sponsorship policy. | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| 33 | The Company has audits to ensure that it does not use sponsorship as channel to facilitate corruption. | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |

| Checklist No. | Issues to evaluate | No | In progress | Yes | Reference (Name of documents/page) |
|--|---|--------------------------|--------------------------|--------------------------|------------------------------------|
| Section 3.5 – Donations | | | | | |
| 34 | The Company has written policy that covers donations. | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| 35 | The Company has set clear definition of giving/receiving donations and other relevant terms. | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| 36 | The Company has steps, controls, and reporting procedures to ensure strict compliance of policy on giving or receiving donations. | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| 37 | The Company has audits to ensure that it does not use donations as channel to facilitate corruption. | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| Section 3.6 – Political Contributions | | | | | |
| 38 | The Company has written policy that covers direct and indirect political contributions. | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| 39 | The Company has set clear definition of political contributions and other relevant terms. | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |

| Checklist No. | Issues to evaluate | No | In progress | Yes | Reference (Name of documents/page) |
|---|--|--------------------------|--------------------------|--------------------------|---|
| 40 | The Company has steps, controls, and reporting procedures to ensure strict compliance of policy on political contributions. | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| 41 | The Company has audits to ensure that it does not use political contributions as channel to facilitate corruption. | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| Section 3.7 – Conflict of Interest | | | | | |
| 42 | The Company has written policy that covers direct and indirect conflict of interest. | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| 43 | The Company has set clear definition of conflict of interest. | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| 44 | The Company has steps, controls, and reporting procedures to ensure strict compliance of policy to prevent conflict of interest. | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| 45 | The Company has audits to ensure no conflict of interest. | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |

| Checklist No. | Issues to evaluate | No | In progress | Yes | Reference (Name of documents/page) |
|---|---|--------------------------|--------------------------|--------------------------|---------------------------------------|
| Section 3.8 - Facilitation Payment | | | | | |
| 46 | The Company has set clear written definition of facilitation payment. | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| Section 3.9 – Revolving Door | | | | | |
| 47 | The Company has set clear and proper policy concerning the employment of government officials to ensure that such employment is not reciprocate benefits received and the policy has been approved by the Board of Directors. | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| 48 | The Company has public disclosure measures regarding information about employment of government officials to ensure transparency and accountability. | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| Section 3.10 – Affiliates, Subsidiaries, Agents, and Third-parties | | | | | |
| 49 | The implementation of anti-corruption policy also covers subsidiaries, associated companies, other companies controlled by the Company, and business agents. | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |

| Checklist No. | Issues to evaluate | No | In progress | Yes | Reference (Name of documents/page) |
|------------------------------------|--|--------------------------|--------------------------|--------------------------|---|
| 50 | The Company has clear policy and steps to communicate with subsidiaries, associated companies, other companies controlled by the Company, and business agents regarding anti-corruption policy implementation. | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| 51 | The Company has communicated anti-corruption measures with suppliers. (For examples, explain anti-corruption measures through letter, event, and/or seminar) | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| Section 4 – Human Resources | | | | | |
| 52 | The Company has human resources management policy covering recruitment, evaluation, remuneration, and promotion of staffs that reflects the Company's strong commitment to anti-corruption policy. | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| 53 | The Company has policy not to demote, punish, or cause any negative consequence to staff who turns down corruption even if the action results in loss of business opportunity. | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |

| Checklist No. | Issues to evaluate | No | In progress | Yes | Reference (Name of documents/page) |
|----------------------|---|--------------------------|--------------------------|--------------------------|---|
| 54 | The Company has effectively communicated with entire employees to ensure they aware of the policy not to demote, punish, or cause any negative consequence to staff who turns down corruption even if the action results in loss of business opportunity. | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| 55 | The Company has measures to put policy not to demote, punish, or cause any negative consequence to staff who turns down corruption into effective implementation even if the action results in loss of business opportunity. | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| 56 | The Company has procedures for staffs to put anti-corruption policy into implementation. | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| 57 | The Company has communicated clearly with staffs, at least through two channels, to inform them about penalties should they fail to comply with anti-corruption measures. | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| 58 | The Company has appropriate measures to penalize staff who fails to comply with anti-corruption measures, including termination of employment should the Company deems necessary. | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |

| Checklist No. | Issues to evaluate | No | In progress | Yes | Reference (Name of documents/page) |
|----------------------------------|---|--------------------------|--------------------------|--------------------------|---|
| 59 | The Company has conducted orientation session with new employees, which also covered anti-corruption measures, expectations of the Company, and penalties for failure to comply with the measures. | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| 60 | The Company has conducted trainings for the Board of Directors, management, and staffs to create genuine understanding about anti-corruption measures, expectations of the Company, and penalties for failure to comply with the measures. | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| 61 | The Company has policy to conduct continuous trainings on anti-corruption measures and knowledge for all levels of staffs, including the Board of Directors and management, especially staffs involving transactions prone to corruption risks. | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| Section 5 – Communication | | | | | |
| 62 | The Company has communicated anti-corruption measures with all staffs. | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |

| Checklist No. | Issues to evaluate | No | In progress | Yes | Reference (Name of documents/page) |
|--|--|--------------------------|--------------------------|--------------------------|---|
| 63 | The Company has disclosed anti-corruption measures to the general public. | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| 64 | The Company has proactively communicated policies and procedures of the following activities with all staffs: <ul style="list-style-type: none"> o Gift and hospitality o Sponsorship o Donations o Political contributions o Conflict of interest | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| 65 | The Company has proactively communicated policies and procedures of the following activities with suppliers: <ul style="list-style-type: none"> o Gift and hospitality o Sponsorship o Donations o Political contributions o Conflict of interest | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| Section 6 - Raising Concerns and Seeking Guidance | | | | | |
| 66 | The Company has written policy about whistleblowing on corruption that covers procedures in receiving complaint, investigator, consideration process, consideration timeframe, and communication with relevant parties. | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |

| Checklist No. | Issues to evaluate | No | In progress | Yes | Reference (Name of documents/page) |
|---|---|--------------------------|--------------------------|--------------------------|---|
| 67 | The Company has communicated clearly with staffs and relevant parties about Whistleblowing policy and channels. | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| 68 | The Whistleblowing channel indicated in the policy must be safe and allows staffs to access with confidence without risk to the informant. | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| 69 | The Company has proper and safe channels for staffs should they need to ask questions or seek advice in complying with anti-corruption measures. | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| 70 | The Company has collected statistics of information/leads concerning corruption (between the Company and government agencies or between companies) and regularly presented to the Board of Directors. | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| Section 7 – Review, Assess and Improve | | | | | |
| 71 | The Company has reviewed, assessed, and improved anti-corruption measures and reported to the Board of Directors annually to measure effectiveness, improve and develop measures in alignment with possible change in corruption risks. | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |

Corruption Risk Assessment Template

To ensure adequacy in providing information in corruption risk assessment, the CAC recommends using the following template. However, the Company seeking certification may opt to use the CAC's template or use its own.

CAC Risk Assessment Template can be downloaded at

www.thai-cac.com/resource_post/large-companies-risk-assessment-template/