

4) Roles of Stakeholders

The Company respects to the rights of all stakeholders and formulates as practical guideline in the Code of Conduct of the Company to ensure that any relevant lawful rights of stakeholders whether being shareholders, employees, executives, customers, business partners, creditors, as well as general public and society, are properly supervised. The collaboration among these groups of stakeholders is promoted based on their roles and duties for the Company's satisfactory business operation, stability and reciprocation of fair benefit to all parties.

4.1 Determination of Stakeholder Treatment Policy

4.1.1 The Board of Directors has set up Stakeholder Treatment Policy for each group of stakeholders as follows:

Shareholders: The Company aims at being good representative of the shareholders due to well awareness that the shareholders are the owners of the business. Therefore, in doing business, the Company is determined to create maximum satisfaction to the shareholders by taking into account the long-term growth of the Company's value with good and continuous return, including disclosing information in transparent and reliable manner to the shareholders through the following practical guideline.

- (1) Performing duties with integrity and making decision for any undertaking with precaution and fair to every shareholder for maximum benefits of the overall shareholders.
- (2) Presenting a report of the status of the Company, turnover, financial information position, accounting and other reports on regular basis in complete and fact manner.
- (3) Reporting to all shareholders in equitable manner regarding the future trends of the Company, both positive and negative aspects, based on feasibility and provided with supporting information and sufficient reasons.
- (4) Not seeking any personal interests or interests of other person using any information of the Company which has not yet been disclosed to the general public or proceeding any matters in a manner which may lead to conflict of interests with the organization.
- (5) The Company must treat every shareholder equally at the Shareholders' Meeting.

Employees: Employee is the most valuable resource and a key success factor of the Company. The Company therefore aims at developing culture and good working atmosphere, including promoting teamwork and polite employee treatment and individualism respect. The employment, appointment and transfer of the employee shall consider on the basis of fairness and morality and utilization of human resources for maximum benefits of the Company. In addition, the Company treats all employees equally regardless of their gender, race, nationality, religion or belief.

Policy and Practice Concerning Remuneration, Welfare and Provident Fund

The Company is responsible for keeping working environment to be safe for life and property of the employees at all times and strictly complies with labor law. Moreover, the Company formulated the policy for supervision of remuneration that corresponds to the Company's performance both in short term and long term under consideration on profitability in each year and performance measurement based on Balanced Scorecard; and employee welfare such as provident fund for saving and creating security for the employees and their family members, and tax benefits for the employees. This saving is subject to willingness and service duration of the employee. However, saving rate and contribution rate of the Company shall be in the range from 5 - 10%. Welfare for housing purchase, social security fund, Fitness & Sport Club, compensation fund in case of occupational sickness/accident, gift in the event of hospitalization and grant-in-aid in the event of natural disaster encounter, and wreath allowance for remain salutation, shall be provided through the following practical guideline:

(1) Privacy

Personal right and freedom must be protected not to be violated through the use, disclosure or transfer of personal information such as biography, health history, work history, or other personal information to other irrelevant parties which may cause damages to the owner or any other persons. Such violation is considered as a disciplinary offence, unless performed by duty in good faith or as required by law or for common benefits.

- 1.1 Protection of the employee's personal information which is under possession or retention of the Company.
- 1.2 Disclosure or transfer of personal information of the employee to the public can only be performed under the employee's consent.
- 1.3 Limitation to disclose and use of personal information of the employees and related parties of the Company as much as necessary.

(2) Equality and Equal Opportunity

- 2.1 The Company shall treat the employee with respect to his/her honor and prestige.
- 2.2 The Company shall fairly select people for employment in different positions by considering qualification of each position, educational qualification, experience and other requirement necessary for the job without barrier against gender, age, race and religion.
- 2.3 The Company shall determine remuneration which is fair and appropriate for the condition and nature of work, performance and ability of the Company to pay such remuneration.
- 2.4 The Company shall support the employees to be trained and developed for work efficiency improvement and give the employees the opportunity of continuous work progress. In last 2017, the employees attended training and development for 22 hours in average per person, including the employees from operational level to first-line superior, middle-line superior, and top-line superior. The training courses prepared by the Company for all employees are classified into 6 main categories as follows:
 - (1) On Boarding Program
 - (2) Foundation Program
 - (3) Career Group Program
 - (4) Quality & Safety Program
 - (5) Leadership & Expertise Development Program
 - (6) Elective Program
- 2.5 The Company is aware that good communication will lead to effectiveness and good relationship in cooperation. Hence, the Company shall promote the employees to be always informed about relevant news under reasonable opportunity as much as possible.
- 2.6 The Company shall provide communication channels for employees to suggest and complain regarding the frustrated occupational issues. All suggestions and complaints shall be seriously considered to define proper solution to ensure the benefits of all parties and to build good relationship in cooperation.

(3) Harassment

- 3.1 The superior should behave oneself to gain respect from the employees and the employees shall not perform any disrespectful act to his/her superior.
- 3.2 No employees shall perform any act of violation or threat either by word or action against other person on the basis of race, gender, religion, age, and physical and mental disability.
- 3.3 All employees shall respect to one another's opinions.

Employee Knowledge and Competency Development Policy

The Company set up a policy and concept for employee development to be competent person, development guideline for preparedness in perfectly and completely performing his/her dutiful work, and development guideline for position growth, resulting in ability of the personnel to work with all of his/her ability in order to deliver quality work to both internal and external customers. Moreover, knowledge and skill acquired by the Company are the knowledge around him/her which can be applied for extension in future career and even after retirement. The Company assigns Human Capital Department to specifically oversee employee-related matters due to its realization that the employees are considered as the asset worthwhile for investment. The Company aims at becoming the number one brand in the minds of customers. This cannot only be achieved by the performance of the CEO or the executives of the Company but it is believed that it can be built by every employee of the Company under various development approaches, for instance:

- Corporate vision, mission, Pruksa Culture, Pruksa Value and Leadership Competency are developed as practical guideline by the members of the entire organization.
- Competency Based Interview is applied in recruitment and selection in order to employ the applicants who conform to Pruksa Culture, Value and Leadership Competency in the way of Pruksa due to the Company's belief that these are contributing factors to its success during the past 20 years and over.
- The training system according to annual training plan consists of theoretical and practical training courses, cultural development, and systematic coaching by the supervisor, supervision of new entrant employee under mentor program, development in a form of work assignment where the employee can be practically trained within operating framework under a clear policy. All of which enables the supervisors and employees to mutually lay an appropriate development plan.
- Organizing Talent & Succession Planning whereas talent is mutually identified by the supervisor together with Human Capital Department in order to specify the talent under consideration from personal performance and characteristics with potential both in managerial and operating abilities. The succession planning for executives at the level of Department, Division, SBU/BU is established through the identification of both talent and successor and by taking into account business needs together with analysis on long-term strategic goals of the organization.
- Encouraging the employees to be aware of their career path. Each employee will know their next position in the career path. Also, the required knowledge, skill and Key Performance Indicators (KPIs) of the next position will be identified so that the employee can mutually set a career planning with his/her superior. In addition, work procedure and self-development procedure are also determined in order to achieve the determined career goal.
- Regularly surveying the employee's engagement towards the organization at least once a year whereas the survey result shall be used to set common work plan for the entire organization in order to increase more level of the employee engagement towards the organization through various activities. Such work plan must be carried out on continual basis and must be contained as part of KPIs of the executives.

Policy for Non-Involvement in Human Right Violation

The Company has a policy to avoid the involvement in all forms of human right violation under management guideline for human right regarding recruitment and employment. The Company shall adhere to the ethical principle of recruitment and employment without discrimination against race, religion, skin color or gender. The Company shall consider the appropriateness of duties and responsibilities for each employee on case-by-case basis, including avoiding the utilization of child labor, conscript labor or forced labor. Moreover, the Company shall not approve any employment of the employee to hold any position whereas his/her direct superior and subordinate have relative or family member relationship, resulting in equal opportunity for everybody to enter to be selected as the Company's employee under focus on competence and suitability for that position. In addition, the Company complies with the laws pertaining to the employment of the disabled by coordinating with government agencies and associations of people with disabilities to promote the employment opportunity among this group of people. If the Company employs none of people with disabilities in any year, the Company shall contribute money to the Fund for Promotion and Development of Life Quality of Disabled Persons as fund for spending on protection and development of life quality of disabled persons.

Customer: The Company aims at developing real estate business with intention of creativity in standard and ethical offer and management of products and services to customers under the following operating principles:

- (1) Deliver quality products and services according to standard under fair conditions and aim at continuous and serious upgrade of the quality standard of products and services, and disclosure of product and service information in complete and accurate manner without any fact distortions.
- (2) Provide correct, sufficient and timely product and service information to customers so that the customers can have sufficient information for decision making. All information provided must not be an overstatement, whether in advertisement or communication in other channels with customers, that may mislead the customers regarding quality, quantity or any conditions pertaining to that products or services.
- (3) Rapidly respond to customer needs and provide an effective communication system and channels for complaints related to product and service quality via www.pruksa.com and Pruksa Contact Center: 1739.
- (4) Retain customer information and secret without use of the said information in wrongful manner, except for information which must be disclosed to the relevant third party under statutory provision.

Competitor : The Company aims at operating real estate business with the objective of sustainable success and maintenance of the Company's business leadership within the industry under moral and ethical competition by supporting and promoting the policy for free and fair trade competition without monopoly or limitation of trade partners to sell products of the Company only. Moreover, the Company has no policy for trade competition using whichever means to acquire the information of competitors in unlawful and unethical manner. The Company adopts the following principles of treatment to trade competitors:

- (1) Conduct and perform under rule of fair competition.
- (2) Not seek for confidential information of trade competitors through dishonest or inappropriate approaches for the Company's business operation benefit.
- (3) Not accuse maliciously or with intention to destroy the trade competitor's reputation.
- (4) Not participate in entering into contract or agreement that may result in unreasonable elimination of trade competitors.

Business Partner and Counter Party : The Company has a policy for business partner treatment based on Corporate Governance (CG) in selection, procurement and employment of the contractors, designers, consulting firms that give the opportunity to all business partners, vendors/contractors/lessors, hereinafter referred as "Business Partner" to bid, quote contracting works, quote selling prices of materials and equipment, or provide design service to the Company in transparent, impartial, open and fair manner with all business partners. Hence, in the event where the business partner is contacted from the executive, employee or any person in the manner of demand for pay, or compensation or any other benefit, unless it is giving by morality either directly or indirectly for self-business benefit acquisition of the business partner in return, or in the event where the business partner deems that business partner searching and selecting process of the Company is performed in non-transparent and unfair manner for the business partner or in a manner that eliminates business partner, the Company shall request collaboration that the business partner shall immediately notify the Company, and suggest improvement guideline for transparency and fairness in procurement and employment for all business partners. The Company is committed to be fair with and protect all business partners equally and fairly.

Selection, Procurement, Employment and Treatment to Business Partners

1. The Company intends to procure products and services according to standard under proper standard as follows:
 - 1.1 Compete on the basis of equal information.
 - 1.2 Have criteria for evaluation and selection of business partners and counter parties.
 - 1.3 Prepare appropriate agreement format.
 - 1.4 Provide management and monitoring systems to ensure that the agreement conditions are completely followed, including preventing misconduct in every step of the procurement process.
 - 1.5 Make payment to business partners and counter parties on time according to term of payment as agreed.

2. The Company aims at developing and maintaining sustainable relationship with business partners and counter parties that have clear objectives regarding product and service quality, technical quality and mutual trust.
3. All executives and employees are prohibited from receiving any personal gifts from business partners and counter parties whether directly or indirectly.
4. No executive or employee shall be involved in procurement process with business partners or counter parties who are related to that executive or employee such as whether by the status of a family member, or relative, or business owner or partner.
5. The use of information received from procurement process for personal or other person's benefit is strictly prohibited.

Business Partner Section Procedure

1. Verify and evaluate work readiness.
2. Evaluate quality of works, products and services.
3. Evaluate on-time delivery of works, products and services.
4. Evaluate the capabilities in terms of coordination, problem solving and readiness of working team.

Complaints

1. Complaint Notification

In the event where the executive, employee, officer and/or related party of the Company is detected to have any conduct that implies fraud, unfairness or demand for the said pay, all business partners can immediately report to the Company for acknowledgement via Line (Line ID : @pruksacg), Website (www.pruksa.com) Complaints/Whistleblowing/Unfair Treatment, Email : CG@pruksa.com, and sending mails to the Chief Executive Officer (CEO) or Chairman of the Audit Committee at Pruksa Real Estate Public Company Limited, Pearl Bangkok Building, 23rd Floor, No. 1177 Phaholyothin Road, Samsen Nai, Phaya Thai, Bangkok 10400.

Apart from playing a vital role in helping the organization, the complaint informant shall also be rewarded up to Bt 30,000 (Thirty Thousand Baht) per case together with a Certificate of Honor from the CEO.

2. Protection Measure for the Complainant or Investigating Collaborator

The complainant or collaborator shall be protected in accordance with the following criteria:

- 2.1 The complainant or fact investigating collaborator can choose not to disclose his/her name if he/she feels that such disclosure may cause any harm or damage. However, if such self-disclosure is made, it will enable the Company to report the progress, clarify fact for acknowledgement or alleviate damage more conveniently and quickly.
- 2.2 The Company shall not disclose the information relating to the complainant or fact investigating collaborator. The said information includes first name, last name, address, picture or any other information that can identify the informant. The investigation shall be conducted to find out whether there is a ground of fact.
- 2.3 The complaint receiver must maintain the confidentiality of relevant information and shall disclose such information only as necessary by taking into consideration the security and damage of the complainant or fact investigating collaborator, source of information or related persons.
- 2.4 In the event where the complainant or fact investigating collaborator feels that there may be harm or trouble and damage to him/her, the complainant or collaborator may ask the Company to formulate protection measure as appropriate, or the Company may formulate protection measure without requirement of request by the complainant or fact investigating collaborator if it deems that it is likely to occur trouble, damage or harm. Relief shall be given to those suffered from any trouble, damage or harm under impartial and appropriate process.

Creditor: Creditor policy and practical guideline were set up and clearly defined by the Company, particularly the subject matters concerning guarantee condition, capital management and event of debt default whether being trade or financial institution creditors. The Company shall not default for debt settlement and shall strictly conform to the conditions defined by creditors as follows:

- (1) To repay debts to creditors on time and in compliance with specified conditions in order to avoid default.
- (2) In debt, loan and interest payment, security or guarantee responsibility, the Company shall strictly adhere to contract or conditions as agreed.
- (3) Whenever critical circumstance which may significantly affect financial position and payable debt, the Company shall manage capital and notify the creditors for mutual finding of preventive or corrective method in order to avoid damage.
- (4) To strictly comply with conditions prescribed by creditors.

Community and Society: With realization that the Company is like as part of the society that will mutually step towards social and environmental development for continual sustainability, the Company therefore gives precedence to the surrounding community and society and continually implements community and social activities. The corporate social responsibility policy was formulated as operating framework for observance by the Board of Directors, all executives and employees so that social responsibility shall be implemented throughout all processes and companywide together with business operation under overall community and social responsibility as follows.

- (1) Have a policy for business operation under concern on environment and strict compliance with the enforced environmental-related laws and regulations.
- (2) Have a clear Corporate Social Responsibility Policy (CSR) for observance within the organization.
- (3) Promote the Company's employees to have environmental and social awareness and responsibility.
- (4) Respect to customs, traditions and cultures of each locality in every country where the Company enters for business operation.
- (5) Regularly carry out activities for mutual creation of society, community and environment for better quality of life of the community where the Company is located through self-implementation and collaboration with the agencies of government sector, private sector and community.
- (6) Being cooperative in activities with the communities surrounding in the areas where the Company enter for business operation appropriately on case basis.
- (7) Carry out accident prevention, control operation, as well as control emission of waste within standard value criteria.
- (8) Rapidly and effectively respond to the circumstance that affects environment, community, life and property as the result of the Company's operation by fully collaboration with government officers and related agencies.

The Company has also implemented CSR activities which are outside the process for mutual sustainability to society through CSR Policy in three areas including education area, society and environment area, and religion, arts and culture area (For more details, see the content in Section "Corporate Social and Environment Responsibility").

Support of Community Development-Related Activities

The Company has a policy to support and participate in community development activities such as:

- Free health checkup program by the physician team of the leading hospital for customers, employees and residents around the projects
- Distribution of seedlings to customers, employees and residents around the projects in order to promote creation of Green Community
- "Environmental Management by Community" Project for encouraging the community to learn the disposal of waste and wastewater from the source for sustainable protection of environmental pollution in the community
- Provision of knowledge on how to plant different kinds of perennials, fruit trees, ornamental plants, and home-grown vegetables for sustainability creation to the schools in the communities
- Provision of knowledge on waste separation for recycle as biochemical compost and for sustainability creation to the schools in the community
- Blood Donation Program for aiding nationwide patients
- Good Health Promotion Activity for customers and community

Safety, Hygiene and Environment: The Company has clear and concrete policy for care of safety, hygiene and environment by giving precedence to safety and hygiene of the surrounding community and society. With well realization that we are like as part of the society that will mutually step towards sustainable social and environmental development for continual sustainability, the Company therefore continuously carries out community and social activities together with business operation under overall community and social responsibility as follows.

- (1) Aim at supporting activity implementation together with compliance with Safety Law and other related requirements.
- (2) Determine that safety at work shall be considered as the top working duty and responsibility of all employees.
- (3) Determine that the superiors in all levels shall behave oneself as good role model and leader, train, coach, and motivate employee for safe working.
- (4) Determine that all employees must always mainly take into account their personal safety as well as the safety of their colleagues and properties of the Company while on duty.
- (5) Determine that all employees must always maintain cleanliness and orderliness of their workplace area.
- (6) Aim at supporting safety activities that contribute to stimulate, promote and develop awareness of the employee for safety at work.
- (7) Aim at continuously supporting review, improvement and development of safety management system.
- (8) Aim at finding the way to mitigate environmental impact by monitoring and controlling the emission and discharge of pollution as well as hazardous and non-hazardous waste management for preservation of source of natural resource.
- (9) Effectively and maximally utilize resource and energy and prevent water, air and waste pollutions and other pollutions occurred from activities of the Company that have minimum impact toward environment and community.

Summary of Occupational Accident Occurrence Statistics for Year 2012-2017

| Details | Gender | 2012 | 2013 | 2014 | 2015 | 2016 | 2017 |
|---------------------------------|--------|-----------|-----------|-----------|-----------|------------|-------|
| Head Office | | | | | | | |
| Injury Rate (IR) | Male | 0 | 0 | 0 | 0 | 0 | 0 |
| | Female | 0.12 | 0.053 | 0 | 0 | 0 | 0.036 |
| Occupational Disease Rate (ODR) | Male | 0 | 0 | 0 | 0 | 0 | 0 |
| | Female | 0 | 0 | 0 | 0 | 0 | 0 |
| Leave Day Rate (LDR) | Male | 0 | 0 | 0 | 0 | 0 | 0 |
| | Female | 0.12 | 0.213 | 0 | 0 | 0 | 0 |
| Absence Rate (AR) | Male | 0 | 0 | 0 | 0 | 0 | 0 |
| | Female | 1,612.90 | 2,272.73 | 0 | 0 | 0 | 0 |
| Number of Occupational Deceased | Male | 0 | 0 | 0 | 0 | 0 | 0 |
| | Female | 0 | 0 | 0 | 0 | 0 | 0 |
| Construction Unit | | | | | | | |
| Injury Rate (IR) | Male | 0.07 | 0.465 | 0.421 | 0.330 | 0.732 | 0.299 |
| | Female | 0.01 | 0.058 | 0.030 | 0.147 | 0 | 0.075 |
| Occupational Disease Rate (ODR) | Male | 0 | 0 | 0 | 0 | 0 | 0 |
| | Female | 0 | 0 | 0 | 0 | 0 | 0 |
| Leave Day Rate (LDR) | Male | 1.12 | 4.938 | 2.345 | 0.550 | 6.809 | 0.485 |
| | Female | 0 | 0.087 | 0.902 | 2.458 | 0 | 0.112 |
| Absence Rate (AR) | Male | 60,925.50 | 96,590.91 | 44,318.18 | 8,522.73 | 105,681.82 | 7,386 |
| | Female | 0 | 1,704.55 | 17,045.45 | 38,068.18 | 0 | 1,705 |

| Details | Gender | 2012 | 2013 | 2014 | 2015 | 2016 | 2017 |
|---------------------------------|--------|-----------|----------|-----------|----------|--------|-------|
| Number of Occupational Deceased | Male | 1 | 2 | 2 | 2 | 1 | 3 |
| | Female | 0 | 0 | 0 | 0 | 0 | 1 |
| Pruksa Precast Factory | | | | | | | |
| Injury Rate (IR) | Male | 1.2 | 0.768 | 1.056 | 0.640 | 0.270 | 0 |
| | Female | 0.22 | 0 | 0.132 | 0.160 | 0.270 | 0.258 |
| Occupational Disease Rate (ODR) | Male | 0 | 0 | 0 | 0 | 0 | 0 |
| | Female | 0 | 0 | 0 | 0 | 0 | 0 |
| Leave Day Rate (LDR) | Male | 5.46 | 1.537 | 3.828 | 1.760 | 0.405 | 0 |
| | Female | 0.33 | 2,273.73 | 1.320 | 0 | 5 | 0.26 |
| Absence Rate (AR) | Male | 26,881.72 | 7,954.55 | 16,477.27 | 6,250.00 | 852.27 | 0 |
| | Female | 0 | 0 | 5,682 | 0 | 11,364 | 568 |
| Number of Occupational Deceased | Male | 0 | 1 | 1 | 0 | 0 | 0 |
| | Female | 0 | 0 | 0 | 0 | 0 | 0 |

From statistical data in 2017, it could be seen that in overview, Injury Rate, Leave Day Rate and Absence Rate for Employee tended to be decreased more than previous year. However, the Company takes the results from collection of accident occurrence statistics in every year as one of the significant development plans in order to aim for minimizing accident occurrence to be Zero Accident, and developing occupational quality of life of the employees which is always the attentive and highlighted matter of the Company.

4.2 Policy and Procedure on Effective Consumption of Resources

The Company set up a policy and procedure for effective consumption of resources through energy saving and resource recycling such as using both sides of the paper, turning off air conditioners and lights during lunch break, turning on the lights only at the location required for use, walking up and down stairs in low floor, and sharing car when traveling to the same way. All of the aforesaid shall contribute to cultivation of personal value and application in daily life of the family.

4.3 Policy and Practical Guideline on Non-Violation of Intellectual Property Rights or Copyrights

The Company set up a policy and practical guideline on non-violation of intellectual property rights or copyrights which is considered as part of the Company's code of business conduct. This includes protection of the Company's property and use of computer system and information technology by requiring the employees who use computer to sign non-violation clause to affirm that he/she shall not violate the right of any person or company which is under protection of copyright, trade secret, patent or any other intellectual property or laws or regulations of similar nature including installation or publicity of illegal software product or software that is not property licensed to the Company.

4.4 Anti-Corruption and Bribery Prohibition Policy

(1) Bribery Offering and Receiving

1.1 The executive and employee are prohibited from demanding or receiving any benefits or properties implying that the executive and employee are motivated to perform or illegitimately abandon his/her duties or causes the Company lose legitimate benefits.

1.2 The employee shall refrain from offering or giving any benefits or properties to the third party in order to induce the said party to commit illegal act or omit any illegal or illegitimate act on his/her own duties.

(2) Gifts or Business Entertainment

2.1 The employee shall avoid offering or receiving any article or benefit from business partner or stakeholder related to the Company's business unless in festival or traditional practice within reasonable value and under the condition that the recipient should consider and consult with his/her original affiliated superior for request of advice as appropriate.

2.2 The employee must not receive or offer any gift or souvenir in form of cash, cheque, bond, share, gold, jewelry, real estate or similar article.

2.3 Gift or souvenir which is reasonable in value such as calendar, diary or stationary with nature of keepsake in New Year's Day, shall be considered as acceptable case.

2.4 In the event where an employee receives any gift, keepsake, gift basket and/or any other article having value exceeding 3,000 Baht (three thousand Baht), the said employee must immediately notify his/her original affiliated superior and return or consider handing over such item to Gift Allocation Committee, except perishable article or article with limited shelf life.

2.5 The employee shall avoid offering or receiving any entertainment in the nature out of the usual business relationship from other person whose business is related to the Company's work.

4.5 Procedure for Monitoring/Evaluating Corporate Compliance under Anti-Corruption Policy

Apart from determination of the aforesaid Anti-Corruption Policy, the Company also has a procedure that the companywide members shall participate in compliance with such policy through various means such as providing knowledge via "Tairom Prukka Journal", E-mail, Intranet of the Company, and trainings/VDO presentation in the orientation day of new entrant employees. The Company shall also monitor and evaluate the compliance with the said policy by surveying the opinions of the executives and employees of the Company on anti-corruption.

4.6 Process for Assessing Risks Resulting from Corruption

The Company declared its intention in anti-corruption by issuing a letter of intent for Private Sector Collective Action Coalition Against Corruption on September 1, 2014. The Company also set up an assessment process for risks originating from corruption by conducting risk assessment in its core process with high level of risk from corruption, and developing effective management and internal control plan to prevent corruption within the organization.

4.7 Supervision and Control Practical Guidelines for Preventing and Monitoring Risks from Corruption

The Company shall conduct risk assessment in relation to product and service delivery, land acquisition, procurement process, and process for determination of standard construction cost for houses, condominiums and precast factories in operating regulation and manual. In addition, Website Call Center is provided as a complaint channel for consumers, employees, general public and government sector, etc.

4.8 Employee Trainings for Provision of Knowledge on Anti-Corruption Policy and Practical Guideline of the Company

In-house training courses on Anti-Corruption Policy and Practical Guideline are arranged for employees who have duties in overseeing or involving in anti-corruption. The employees are also delivered to attend the external trainings organized by both public and private sectors. Each employee shall be trained in relation to anti-corruption since the first day of his/her work commencement. Furthermore, the Company also arranges Anti-Corruption Training in form of video, billboard, announcement, Code of Business Conduct, whistleblowing regulation, complaints in relation to fraud and corruption, and regulations pertaining to the offering or receiving gifts, souvenir, entertainment or other benefit/anti-corruption measure.

4.9 Environmental Knowledge Development and Trainings for Employees

The Company established as Corporate Social Responsibility Policy (CSR Policy) and announced among both within the organization and the third parties for acknowledgement all together as follows:

Prukka Real Estate Public Company Limited aims at developing real estate business in order to promote social and economic development, and conserve environment by producing quality products and providing quality services under cultivation of value that the employees shall be attentive in working according to the principle of good governance by taking the interests of all stakeholder groups into account. The sample of training includes the environmental training and knowledge for all employees who work at Prukka Precast Factory since their first day of work commencement. Environmental care knowledge is disseminated to undergraduates, students and organizations that are interested to visit Prukka Precast Factory, etc.

4.10 Complaint

The Board of Directors provides communication channels for every group of stakeholders to be able to contact with the Company/complain on the matters that may directly damage the Company or the Board of Directors as per the following details and procedures:

(1) Complaint Notification

If an employee or a stakeholder detects any action which is suspicious that it may be in violation of rights or non-compliance with Code of Conduct, he/she can inquire doubts or report the responsible person as follows:

- Superior level that is trusted by you at all levels
- Internal Audit Department or Corporate Governance Committee via the Secretary of Corporate Governance Committee

- Other units or channels designated by the Company such as complaining with Corporate Communication Department by phone call at 1739, Line channel (Line ID : @pruksacg), Website (www.pruksa.com) under Complaints/Whistleblowing/Fairness Request, Email: CG@pruksa.com or direct postal mailing to the CEO or Chairman of the Audit Committee at Pruksa Real Estate Public Company Limited, Pearl Bangkok Building, 23rd Floor, No. 1177 Phaholyothin Road, Samsen Nai, Phaya Thai, Bangkok 10400.

(2) Action Process upon Complaint Receiving

- Collection of Facts

The complaint receiver shall collect facts related to violation or non-compliance with code of conduct by him/her or assign Human Resource Department or other units of similar functions but called otherwise to collect such facts.

- Processing and Screening of Information

The complaint receiver shall process and screen the information to consider appropriate steps and actions for each matter by him/her, or assign Human Resource Department or other units of similar functions but called otherwise to process and screen the information, or assign the Investigation Committee, which will be appointed by Corporate Governance Committee on a case-by-case basis, to process and screen the information for appropriate action.

(3) Action Measures

- The complaint receiver shall propose action measure for settlement of violation or non-compliance with code of conduct, and relief of damage for the affected persons under concern on the entire overall trouble and damage.

(4) Report of Results

- The complaint receiver has duty to report the results to the concerned parties. For important matters, the report shall be submitted to the Chief Executive Officer and/or the Audit Committee and/or Corporate Governance Committee and/or the Board of Directors, as the case may be.

(5) Protection measure for complainant or complaint investigating collaborator, or investigating collaborator whereas the said person shall be protected under the criteria (For more details, see Section "Business Partner, Counter Party - Complaints")

4.11 Employee Compensation Policy

The Company establishes employee compensation policy that is in line with the Company's operating results in both short term and long term. The purpose of compensation payment is to motivate the employees to work efficiently and effectively in order to achieve the Company's setting goal. In short-term, the concept of Balance Scorecard (BSC) and Key Performance Indicator (KPI) are applied as tools for managing employee compensation payment based on their performance, and arrangement of other welfare for building employee engagement regardless of separation of salary rate and basic compensation. The compensation ratio between female and male employee is 1:1 such as salary increment or bonus as reward based on performance and commission. Long term employee compensation policy includes offering of ESOP which has been carried out since 2005 until present.

4.12 Violation of Laws Pertaining to Labour, Employment, Consumer, Business Competition and Environment

In last 2017, the Company did not perform any actions in violation of laws pertaining to labour, employment, consumer, trade competition and environment.

4.13 Oversight by the Governance Agency

In last 2017, the Company declared information of important circumstances within the timeframe specified by the official. Hence, the governance agency did not perform oversight on the Company.