

TRIMORO CO., LTD.

211/11-14 NONSI ROAD, CHONG NONSI, YANNAWA, BANGKOK 10120 THAILAND

TEL : (662) 295.30.78, 295.29.43, 681.30.15 FAX : (662) 295.30.79 Email : office@trimoro.com

Anti-Bribery and Anti-corruption Policy

Trimoro place great importance on anti-corruption guidance and strive to comply with anti-fraud, anti-corruption, and anti-bribery laws involving officials in the governments and employees of the private sectors either within or outside the country. Trimoro also promotes anti-corruption awareness of all forms of corruption among all levels of personnel.

The Managing Director has arranged this policy as a part of the Responsible Jewellery Council and Corporate Governance Policy to ensure that Trimoro will comply with all prescribed policies. Also, this policy is the standard practice for Management and Employees at all levels, and any person with activities beneficial to Trimoro. Any violation considered inappropriate and against Trimoro's policies will be subject to disciplinary and legal punishments.

Definition

Fraud refers to any activities seeking unlawful benefits for oneself or others, including embezzlement, financial statement manipulation, and corruption.

Corruption refers to any activities, whether offering, promising, demanding, or asking for assets or other benefits with government officials or any personnel that poses business activities with the Company, either directly or indirectly. The activities influence persons to conduct, or abstain from conducting their duties, or to acquire or retain impropriated business benefits, except for receiving consent from laws, rules, regulations, local traditions, or trade customs.

Giving or Receiving of Gifts refers to giving or receiving money, assets, payments, or other benefits.

Entertainment and Hospitality refers to expenditure for business hospitality such as hosting of meals or parties, sport entertainment, and other expenditures directly related to business operations, or trade customs, as well as business training.

Donation and Sponsorship refers to offering financial support, products, or services to requesters. The objectives are for society's public interest, or promotion of business and the good image of Trimoro.

Political Aid refers to offering assets, money, gifts, rights, or other benefits to help, support, or benefit a political entity. The political entities included political parties, politicians, or any persons whose duties involved politics or political activities, either directly or indirectly.

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Conflict of Interests refers to any activities or circumstances in which a person has a private or personal interest in conflict with the utmost benefits of Trimoro. Whether it is from contacting individuals involved in the businesses of Trimoro, or from abusing an opportunity or information from being employees to seek personal benefits, and engaging in the same business as Trimoro, or from working for other areas beyond Trimoro, which may affect performance under the responsibility.

Facilitation Payment refers to an unofficial payment made in return for services which the payer is legally entitled to receive without making such payment. Normally, it is a relatively minor payment made to a government official to assure or expedite the performance of a routine or necessary action, such as the issue of a permit or certificate, and the providing of public service.

Government Officials refer to politicians, government officials, or local government officials with positions or fixed salary, personnel or individuals working in state enterprise or government agencies, local council executives and members without political positions, officers under Local Administration laws, including committee, subcommittee, workers of government, state enterprise, or government agencies, and person or group of persons who exercise authority or assign to exercise government's administrative authority to take a legal action, regardless they're established under government, state enterprise or other government entities.

Involving Persons refer to spouses, children, parents, siblings, or close relatives of Management and Employees at all levels of Trimoro.

RJC refers to Responsible Jewellery Council

RJC COPs refers to Responsible Jewellery Council Code of Practices

Principal

Trimoro's Management, Employees, and any person with activities beneficial to Trimoro must perform their duties in accordance with laws and regulation of anti-fraud and anti- corruption as well as the Company's Corporate Governance and policy, article of association, practice and guideline. They must perform duties transparently and must not act in any way that indicates an intent of fraud and corruption, including asking for, operating, or accepting any forms of corruption for benefits of themselves, involving persons, friends, and acquaintances. They must always prepare to be reviewed or investigated their work and business operation by authorized staff from involving agencies. Nevertheless, Trimoro's suppliers, subcontractor, customers and other business partners may consider bringing the Company's policies and RJC COPs to apply where they find appropriate operations.

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Measures and Operational Guidelines for the Company

1. Trimoro has delegated an Anti-Corruption Working Group to effectively execute the Company's Anti-Corruption measure according to the declared intent to join the RJC member.
2. Trimoro will constantly review and amend this Anti-Corruption Measure, and report to the Corporate Governance Committee annually to evaluate, amend, and develop measures to ensure compliance with changing corruption risks.
3. Trimoro has issued corruption risk assessment, and risk protection measures covering operational control, environment control, financial control, and document storage.
4. Trimoro has received the external audit as the control systems over the financial report recorded process, accounting process, and data storage.
5. Trimoro maintains political neutrality. Also, the Company has no policy to provide financial support, resources, or any assets to politicians, political parties, or any political groups for the benefits of the above politicians, political parties, or any political groups, either directly or indirectly.
6. Trimoro has no policy to provide facilitation payment, either directly or indirectly. The Company will not execute or accept any action to exchange with facilitation of business operation.
7. Trimoro has prescribed appropriate, comprehensive criteria of recruiting government officials to prevent the process from receiving any benefits. For transparency purposes, the Company also issued measures to reveal information involving hiring government officials to the public.
8. Trimoro has Human Resource policy and procedures on the recruitment and selection process, promotion, performance appraisal, and compensation offered to employees in order to demonstrate anti-corruption intention.
9. Trimoro will not demote, punish, or provide any negative impacts to personnel who deny fraud and corruption activities, despite the activities may cause Trimoro to lose a business opportunity. The Company will clearly communicate this to its employees.
10. Trimoro will constantly train and educate the Anti-Corruption Measure and knowledge to Trimoro employees.
11. Trimoro communicates the Anti-Corruption Policy and Guidance to its customers, suppliers, business partners, stakeholders, and the public, via diverse channels in order to acknowledge and execute.
12. Trimoro has established the Announcement of Trimoro On Guidelines for Accepting and Offering of Gifts, Hospitality, or Other Similar Forms of Reward to apply as guidance for Trimoro employees to conduct themselves properly.
13. The operation under this policy complies with the Company's Corporate Governance and RJC COPs and relevant policies, rules, regulations, and guidance.
14. Trimoro constantly reviews this policy every year as one of our tasks in annual management review which is in accordance with the Responsible Jewellery Council Code of Practices as membership of Responsible Jewellery Council, or by an appropriate period following the changing of involving laws, rules, and regulations. The review process will be proposed for approval from the Managing Director.

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Punishment

1. Trimoro has established penalties for Management and Employees who fail to comply with the Anti-Corruption and anti-Bribery Measures. In the case of Directors, the punishment is to discharge. For Executives and Employees, the punishment is imposed based on disciplinary penalties provisions, as well as relevant clauses of laws, regulations, and the Company's Corporate Governance and RJC COPs.

In the case that involving persons, or customers, suppliers, business partners fail to comply with the Anti-Corruption and Anti-Bribery Measure. Trimoro may consider terminating any business activities with that involving persons, customers, suppliers, or business partners.



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