

Handbook Code of Conduct For All Personnel

2nd Edition (2017)



Bangkok Life Assurance Public Company Limited and subsidiaries

Vision

To make people realize the benefits of the life insurance and choose insurance coverage which is suitable for their financial position and value of life.



Mission

The Company is determined to be a leader in establishing financial security for all groups of people and protecting their value of life by offering financial advice and impressive service through its sincere agents, partners and employees who are experts in their field.



Corporate Values

Faith Happily provide life insurance coverage and be willing to help people understand

the benefits and value of the life insurance.

Responsibility Be determined to accomplish goals and objectives in due time. Be professional,

ethical and repect the rights of others.

Sincerity Be trustworthy for customers by providing them with impressive service

beyond their expectation. Be open and straightforward in communicating with

others and in disclosing information.

Self-development Have a clear goal, creativity and eagerness to seek new knowledge that can

contribute to continual self-development and ultimate success in the profession.

Teamwork Be proactive at work and efficient in coordinating and communicating with others to

attain desired results. Be supportive of and friendly with co-workers.

Message from Chairman of Good Corporate Governance Committee

Bangkok Life Assurance Public Company Limited ("Company") is trusted by the public to provide security to people's lives, families and societies by its shareholders, regulatory agencies, and all groups of stakeholders to operate on a fair basis as well as to act in the best interest of all parties concerned. It is, therefore, essential for the Company to lay its corporate governance structure and standards in line with international practices in order to ensure its sustainable growth.

This Code of Conduct Handbook for all personnel is a revision of the Good Corporate Governance and Code of Ethical Conduct and Business Practices Handbook (2014). Additional contents are added to allow compliance with international best practices and to lead towards good corporate governance achievement.

The Company seeks cooperation from its Directors, Executives and those who act on behalf of the Company and subsidiaries to study this Code of Conduct Handbook in order to maintain fairness for all parties.

Mrs. Komkai Thusaranon

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Chairman of the Good Corporate Governance Committee

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Practice Principles and Mechanism for Code of Conduct for All Personnel

1. This Code of Conduct is imposed on the following persons:

- 1.1 Directors serve as a role model for employees.
- 1.2 Executives, employees, agents, financial advisors, and those who act on behalf of Bangkok Life Assurance Public Company Limited and its subsidiaries established in Thailand and overseas shall strictly comply with this Code of Conduct.



2. Reporting Violation against or Noncompliance with the Code of Conduct

Because most problems can be solved through consulting, the Company encourages you to consult with your trusted supervisor or executive on your problem. If you are not treated fairly or your problem is not solved, please contact the following:

Internal Audit Department

Tel. 0-2777-8231-6 Fax. 0-2777-8237

E-mail: auditor@bangkoklife.com

Compliance Office

Tel. 0-2777-8607-8 Fax. 0-2777-8605

E-mail: compliance@bangkoklife.com

If your report on violation against or noncompliance with the Code of Conduct involves Directors or executives, you can whistle blow on such problem in accordance with the whistle blowing policy¹.

Chairman of the Internal Audit Committee

E-mail: audit_committee@bangkoklife.com



in accordance with the Company's whistle blowing policy published on its website.

3. Measures to protect and mitigate loss for whistle blowers, complainants, or those who collaborate with the investigation

The Company shall keep name, address, or any other information of the whistle blower, the complainant, or those who collaborate with the investigation confidential. Any other information will only be disclosed as necessary. The Company takes into account safety of and damage to the whistle blower or complainant, sources of information, and other persons concerned.

The Company shall not treat the whistle blower or complainant unfairly. Unfair treatment includes changing position, responsibilities, workplace, work suspension, threatening, disturbance, dismissal, or any other acts which are unfair to the whistle blower or complainant or those who cooperate in the fact finding investigation.





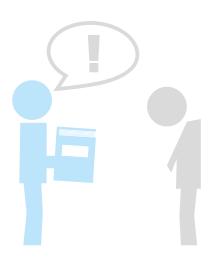
4. Acts in Violation of the Code of Conduct

All personnel shall comply with and encourage others to comply with the Code of Conduct. The following acts are considered violation of the Code of Conduct:



- 4.1 Not complying with this Code of Conduct and your profession's Code of Conduct:
- 4.2 Advising, encouraging, or supporting others to violate or not comply with the Code of Conduct;
- 4.3 Ignoring or neglecting to report on violation against or noncompliance with the Code of Conduct that is under your supervision or responsibilities;
- 4.4 Not collaborating or obstructing the investigation;
- 4.5 Threatening, intimidating, or unfairly treating the whistle blower, the complainant, or those who collaborate in the investigation.

Disciplinary actions shall be taken against those who violate the Code of Conduct, in accordance with the Company's regulations. In addition, legal penalties may also be imposed on those who breach applicable laws.



Code of Conduct



1. Legal and Regulatory Compliance

The Company is determined to conduct its business in accordance with the governing laws and regulations in order to maintain trust, and confidence among regulator and stakeholders. Complying with the laws and regulations is of the paramount importance to the business. Everyone must rigorously abide by the laws and regulations because you are representing or acting on behalf of the Company.

Guidelines:

- 1) You are to perform your duty in compliance with governing laws and regulations or ethical codes imposed by relevant governing bodies. You are expected to study and develop your understanding of pertinent laws. In case of questions, consult your supervisors or the Compliance Office.
- You are to strictly adhere to the Company's rules, regulations and conduct codes. In case of questions, consult your supervisors or the Compliance Office.
- You must not take part in supporting or partaking in any acts or concealment of acts that are in breach of laws or regulations. You should also avoid and not find loopholes in laws and regulations to commit unlawful acts.
- You must always be aware that you are performing duties in the name of the Company; therefore, you must behave in a way to uphold morality, correctness, and legitimacy in accordance with law, morality, and social norms.

Examples



Case 1

Current law is undergoing major changes which may be enforced in the near future. The new amendments will be beneficial and allow for better justice for consumers. As the Company's executive and employee, what should you do?



Advice

You should monitor and study the details of the given law, together with the Compliance Office and other concerned sections. Having a proper understanding of the new regulatory requirements would allow you to make all necessary adjustments towards products, services and internal systems before the new law takes effect. Any adjustment made must be based on a business conduct that is fair to consumers and stakeholders.

2. Human Rights

The Company supports the protection of human rights, freedom, and equality of all stakeholders inside and outside the organization based on the universal declaration of human rights. It shall not violate personal human rights and freedom by any means.

Guidelines:

- You must respect others' rights and freedom e.g. freedom of speech and freedom of expression and must not discriminate against them because of their race, religion, sex, social status, physical condition, cultural belief, political belief, in accordance with the human rights law and the universal declaration of human rights.
- 2) You should treat others politely and respect them. You should not verbally insult, disparage, attack, curse, harass, or defame others.
- You must select job candidates on a fair basis and take into account their educational background, past experience, physical condition which will not obstruct them from carrying out their duties, and other qualifications. You must also support training, development, effectiveness enhancement, and career advancement and set fair compensation reasonable for their work features and performance.
- You should respect others' privacy.

Examples (

Case 1

What should you do if your co-workers talk about politics and have different opinions from you?

Advice



Politely excuse yourself and leave the conversation. Tell yourself that you need to respect others' rights and freedom of speech.

Case 2

If a co-worker of yours verbally insults other people, what should you do?

Advice

If you are close to him/her, as a close co-worker you can warn him/her not do it. However, if his/her act can cause damage against the Company, you must report the incident to the section in charge of that co-worker.





3. Society Environment and Safety

3.1 Social Development and Harmonious Living

The Company is determined to build stability for people in the society for their benefit in all stages of life, and to enhance knowledge, quality of life, and selfdependence within their own community. The Company promotes social awareness by taking part in social and environmental activities on an ongoing basis.



Guidelines:

- Your duty is to provide advice on life insurance and financial planning by upholding sincerity and the profession's Code of Conduct and taking into account the needs and risks of each life stage.
- You should pay attention to, monitor, or coordinate with the responsible units in resolving problems and complaints in a fair manner and in line with laws/ regulations.
- You must adhere to laws, regulations, local cultures, and social etiquette in order to maintain peace and harmony.
- You should be eager to learn new things and continue to develop yourself so as to ensure that good services are delivered. You should appreciate others' value, contribution, and creativity.
- You should volunteer for social development activities.
- You should promote, preserve, and maintain local traditions and cultures by participating in and supporting the public and private sectors' social development policies and activities.



Examples

You received a complaint from a customer who wanted to cancel her policy and demanded a full premium refund because her agent did not explain to her that the product was a life insurace policy and she had mistaken it for savings deposit. What should you do?

Advice

You should inform the customer services centre for investigation and continue to keep the customer informed of the investigation progress. If it was the agent's fault, you should apologize to the customer and offer her some other options. You should also explain in detail the policy benefit. If the customer insists on canceling her policy, you must process her request urgently.

Case 2

If people in your community still lack knowledge in financial planning, as a financial advisor what should you do?

Advice

You should help provide them with knowledge on financial planning, starting from your surrounding communities in order to enhance their stability and happiness in life.





3.2 Environmental Conservation and Use of Natural Resources

The Company upholds the importance of environmental conservation. It employs suitable technology to reduce natural resource consumption and creates environmental awareness among employees and others.

Guidelines:

- 1) You should consume natural resources efficiently and wisely. Electricity, water, paper, and other materials should be utilized according to the principle of reduce, reuse, and replenish.
- You should use environmentally friendly materials, tools, office equipment.
- You should take part in environmental conservation and social development 3) activities along with people, organizations, and business partners in your community.

Examples

Case 1

You are approached by a seller of a product with a cheaper price, but it is not registered as an environmentally friendly product. Other business operators at the same time offer registered products. What should you consider when making a purchase decision?

Advice

You should choose the environmental friendly registered products.

Case 2

If you overheard people in the community saying that the Company's air-conditioner is too loud and disturbs their hearing and that some smoke came out from it. Those people do not know how and to whom they should file their complaint. What should you do?

Advice

You must inform the building maintenance or branch office of the problem immediately so that the problem gets solved and disturbance can be handled urgently.

3.3 Hygiene and Safety

The Company takes hygiene and safety as an important matter. It evaluates situations that may create effects on hygiene and safety before carrying out any actions. It also ensures that the business premises, work processes, office equipment and tools are safe for use.



Guidelines:

- 1) You must comply with applicable laws, standards, and guidelines on health and safety and must cooperate in preventing problems and minimizing their possible effects.
- 2) You must report to your supervisor or persons concerned immediately when encountering irregularities of office equipment or office areas that may harm health and safety in the workplace.
- 3) You should take care of and examine your health and that of your co-workers and other persons concerned before coming to work. You must take a leave or order your subordinates to take a leave if you or they do not feel well.
- 4) You should promote awareness of hygiene and safety among people of the organization, surrounding communities, and business partners through appropriate media.



Examples

Case 1

If many co-workers develop influenza type A, what should you do?

You should inform the office building services section to clean the work space and surrounding areas of those who are sick in order to reduce the influenza contagion risk.

Case 2

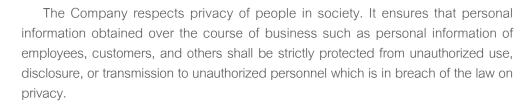
If you find a damaged electrical appliance located in the hallway, what should you do?

Advice

You should call the office building services to check and repair the equipment.

4. Information, Information Technology Systems, and Other Properties

4.1 Personal Information²



Examples

Guidelines:

- You must respect others' privacy and must seek consent from particular persons whose information will be used, disclosed, or sent to other users.
- Everyone must take good care of personal information under their possession. Using, disclosing, or transferring personal information shall be done in a careful manner and only if necessary, in accordance with international standards and applicable laws.
- You must be aware of the importance of personal information, especially customers' information. You shall strictly retain confidential information and comply with the Company's measures to maintain information security.

Case 1

If you are in charge of a policyholder service department and you find out that another section has a more up to date telephone numbers of customers, do you think you can use that information?

Advice

You can use such information and should consider updating your database in order to prevent problems when you need to contact customers to inform them of important information.

Case 2

A former employee called you to ask for name, address, and telephone number of someone in your team so that she can contact that person. Should you provide her with the requested information?

Advice

You cannot give that information to the former employee because it is considered personal information, though generally known and available among co-workers, shall only be disclosed if the information owner agrees.

²Personal information means personal indentiable information such as name-last name, date of birth, address, telephone number, health record, criminal record, work history, and so on.



4.2 Inside Information and Securities Trading

Inside information³ shall be handled appropriately. Users shall take into account the effects on stakeholders and requirement of applicable laws. Inside information shall not be used to seek personal and others' gain.

Guidelines:

- 1) Confidential and material information shall be appropriately retained and protected from leakage to unauthorized users even after the person in charge is no longer employed by the Company or in charge of that information.
- 2) You must not use inside information which has not been publicly disclosed to trade the Company's securities in order to avoid unfair trading at all time.
- 3) You must not use confidential information for personal or others' gain.
- 4) You should not give advice or opinions concerning trading the Company's securities unless such activity is part of your duty assigned by the Company.
- 5) You must not disclose or send inside information to unauthorized persons which include your family members, relatives, friends, acquaintances, and so on.

Examples

Case 1

You learned that your co-worker saw the Company's profit & loss statement before it is publicly disclosed and you saw her buying/ selling the Company's shares. What should you do in this situation?

Advice

Inform Audit Committee/Internal Audit Tel: 0-2777-8231-6 Fax: 0-2777-8237

E-mail: audit_committee@bangkoklife.com and/or Corporate Governance Committee/ Compliance Office

Tel. 0-2777-8607-8 Fax. 0-2777-8605 Email: compliance@bangkoklife.com

You may choose to remain anonymous. The Company protects whistle blowers' or complainants' information.

Case 2

You work in a product development team and know that the Company is going to be the first insurer to launch a new type of product. Your friend who works for the Company's competitor asks you about the new product. What should you do?

Advice

Tell your friend that the information he asks about is your Company's confidential information that cannot be disclosed.

³Inside information means information about the Company's business which if disclosed inappropriately will create a significant impact on the Company's security price or influence investment decision making. Examples are information in financial statements, information about investment projects which have not been publicly disclosed, and so on.

4.3 Information Technology Systems and Other Properties

The Company places a great emphasis on the security and effective use of its information technology systems and other properties. They shall be maintained and protected from infringement, stealing, and use for personal benefit.



Guidelines:

- 1) You should use the information technology systems and data effectively and prevent them from unauthorized access by following the "clear desk clear screen" measure strictly.
- You should store work files and electronic information in the designated place.
- You should consult with the information technology team that is in charge of information security before installing any programs in the Company's computers.
- You are not allowed to use the information technology systems to access or send information that is unethical, or illegal.
- 5) You must keep your computer log-in ID and passwords confidential. You must not leave a document containing your ID and password visible by others.
- 6) You should take care of the Company's properties and prevent them from being damaged, lost, or stolen. You must inform the asset control unit for any repair requirements.

Examples (

Case 1

You found that your co-worker downloaded some illegal music and songs, what should you do?

Advice

You should tell him that he is not allowed to install anything into the Company's computer without permission. Employees are not allowed to install any programs that infringe copyright and to listen to the radio or music if not related to work during their working hours.

Case 2

If you accidentally find somebody's computer log-in password, what should you do?

Advice

You should inform the Information Technology Division to return the password to the owner so that she/he can be informed tochange his/her password immediately.

⁴Clear desk clear screen means keeping the desk cleared of documents, information or other materials in which information is recorded when not in use and logging off computer screen and/or systems every time while not using them.

4.4 Intellectual Property



Intellectual property is a valuable asset for the Company. All employees have their duty to protect it from unauthorized use or dissemination and misuse. They shall not infringe others' intellectual property.

Guidelines:

- You should always be aware that pieces of work such as computer programs, audio and visual materials, movies, voice records which are produced over the course of business are the Company's copyright.
- You should protect the Company's intellectual property from being infringed, disclosed, duplicated, altered, or used without authorization.
- You must respect and not infringe others' intellectual property. You must not use others' copyrighted work unless you are given permission from the copyright owner.
- Before entering into any contract or legal transaction, you must clearly address the intellectual property rights. If you have any questions, you can consult with the person in charge of intellectual property of the Company or the Legal Office.



Examples

Case 1

While preparing a magazine to promote the Company, you find that the pictures that are used are copyrighted by external owner. What should you do?

Advice

You should let the person who uses those photos know and seek permission from the copyright owner so as to give proper credit to his work. Or else, you can replace them with other photos owned by the Company.

Case 2

You need to use a computer program that you do not currently have. You know a shop that sells it. What should you do?

Advice

You are not allowed to install a computer program into the Company's computer as it may lead to a copyright infringement or a lawsuit proceeding brought against the Company. You should consult with the Information Technology Division for further advice.

5. Anti-Corruption

The Company's business shall be conducted on the basis of honesty, good faith, straightforwardness, transparency, and auditability. No transactions shall be conducted in support of fraud, corruption, and personal gain which are in violation of applicable local and foreign laws.



Guidelines:

- 1) You must not conduct any acts which can be regarded as corruption or bribery with the intention to influence somebody to arrange, act, or delay an action for unlawful gains.
- 2) If you are requested by a public/private entity, either local or foreign, to give or offer a gift, property, or something in return regardless of its form or value which can be regarded as corruption for unlawful gains, you must reject the request and provide the requester with a polite explanation immediately.



- 3) You must not ignore or disregard actions which could get the Company involved in corruption. You must report the incident to your supervisor or unit in charge immediately and cooperate in the fact-finding process or investigation to ensure fairness for all parties concerned.
- In making a donation or sponsoring an event, you must ensure transparency and compliance with applicable laws and regulations. You must also ensure that the donation will not be used for corruption or bribery.
- You must remain prudent in conducting transactions with any person, legal entity, or organization which may be involved in corruption or illegal activities.



Examples

Case 1

While trying to sell a group insurance policy to a corporate customer, you are asked to give a gift to the customer, which can be in any form or of any value, in exchange of a purchase of the product. This could be regarded as bribery to seek unlawful gains. What should you do?

Advice

You must reject the request and politely explain about the Company's intention of not supporting corruption or activities for unlawful gains.



Case 2

If you happen to witness something that your coworker unintentionally did that may lead to the Company's involvement in corruption, what should you do?

Advice

You should tell her about the possibility of that situation falling into corruption and advise her to study the Anti-Corruption Policy and its guidelines on the Internet and Intranet; Corporate Governance Handbook; and Code of Conduct. Your coworker can also consult with the Head of the Compliance Office directly.

6. Gifts and Other Benefits⁵

Receiving or giving gifts whether in the form of property, services, or entertainment or participating in seminars with other business should be customarily reasonable or in line with the business traditions of that particular locality or country. The value of the gifts must be reasonable and should not influence decision making in connection with unlawful or create the impression of assistance of obligation between the giver and the receiver.



Guidelines:

- 1) You can receive or give gifts according to the culture, traditions, or business etiquette practiced in a given locality. However, the value of the gifts must not be higher than necessary or unreasonable.
- 2) You should not take or give gifts or any other kinds of benefit that may impact the Company's image or may influence somebody to make a certain decision or abuse his/her duty.
- 3) You should not give gifts to any persons, agencies, or organizations which declare that they do not accept gifts from any other organizations.
- 4) You can join seminars or training events held by outside organizations or current/prospect business partners. Your participation in such events must not affect your business decision making.

Case 1

A tour agency, Sanook Sanan Tour which is the Company's business partner gave a New Year gift basket to one of our executives, containing a bottle of wine and other items with value of 15,000 baht. What should that executive do?

Advice

- He needs to decline the gift and politely to them about the Company's intention. Taking a gift basket with a bottle of wine, which is of high value, can create the impression of mutual support or obligation between the Company and the giver, which may be bribery.
- If he cannot decline the gift, he can take it and reports to the Compliance Office, using the specified report form.
 If the gift is useful, it can be sent to the Administration Department for a use in other work functions. Or else, it can be sent to the Human Resources Department.

Examples

Case 2

A business partner invited you to join a seminar which will be held in another town. That business partner also offered to pay for all expenses to be incurred including meals, accommodation, and fares. Should you join the seminar?

Advice

- You can join the seminar if its purpose is to enhance and exchange knowledge or to strengthen business relations. However, your participation in the event should not influence your decision making. You must also seek approval from your supervisor beforehand.
- Once you are granted approval by your supervisor, you need to inform the Human Resources Department and follow the usual process.

⁵Gifts mean money, property, or any other benefits given to strengthen a relationship or as a prize, gratuitous gift, donation, or incentives. Other benefits include activities such as training course, seminar, or welcoming event, and so on.

7. Conflict of Interest⁶

All personnel shall uphold integrity and the best interest of the Company. They shall not seek personal gains that are against the Company's interest and shall avoid any actions which may create a conflict of interest against the Company.



Guidelines:

- 1) You must not enter, partner or join, or hold shares with control, take directorship or executive position at competing businesses or conduct a business similar to that of the Company.
- 2) You should not be involved in any transactions when a counterparty is related, such as family members, close relatives, close acquaintances, or an entity that you own or in which you hold partnership, even though your involvement will bring benefits to the Company.
- 3) You must not seek gains from the information you or others know over the course of carrying out work duties.
- 4) You should avoid working on your personal matters or businesses that are outside the Company's scope of work as it may affect work under your responsibility and the Company's image.
- 5) When encountering incidents that may create a conflict of interest against the Company, you must report on them to your supervisor immediately.



Case 1

You are a member of the committee in charge of hiring a contractor for office renovation. You know that one of your relatives who owns a construction company also enters the bidding to win this project. What should you do?

Advice

You should let your supervisor and the chairperson of the committee know. You should withdraw your participation in selecting a bid winner.



⁶Conflict of interest means a situation or action in which directors, executives, or employees have personal interest that influences them in making a decision or carrying out their duty. Such situation or action has direct and indirect effect on the Company.

8. Political Participation

The Company is politically neutral and does not carry out any actions to support any political movements, parties, alliance, politically influential groups, election candidates either directly or indirectly. The Company respects its employees' political rights and freedom as a citizen under the Constitution.



Guidelines:

- 1) You can freely exercise your politically rights and freedom as long as they are not against applicable laws.
- 2) You must not carry out any actions that could mislead the public that the Company is involved with, interested in, or supportive of any political movements, parties, groups, influential figures, or election candidates.
- 3) You must not wear your uniform or use any kinds of symbol that could mislead the public that you are representative of the Company when joining a political demonstration or any kinds of political public gathering.
- 4) You must not use the Company's resources or properties in expressing your political involvement.
- 5) You should avoid giving opinions about politics when you are at work in order to prevent conflicts among coworkers.

Examples

Case 1

Can you request a leave to join a political event?

You can take leave to join a political event by following the Company's leave policy. Your involvement must be done only under your own name. You must not mislead the public that your are representative of the Company or that the Company is involved with, interested in, or supportive of any political party, alliance, politically influential figure, or election candidate.

Case 2

You want to express your support for a political rally which happens to march past your office. What should you do?

Advice

You can express your support during your break and before or after work. Your participation must not be done in the Company's premise so as to prevent the public misunderstanding of the Company. You must not wear the Company's uniform while doing so. It is your responsibility to change your uniform before joining the activity. You must neither use any symbols that represent the Company nor take photos that may have the Company's logo and post them on social media.

9. Responsibility for Consumers⁷

The Company takes priority of the customers' interest and satisfaction by offering quality products and services that can meet the needs of customers of all ages. It helps strengthen customers' security, wealth, stability, and sustainability.





Guidelines:

- You must truthfully present products and services based on facts and must not distort any information that could mislead customers about the features of products or services.
- You should use sales proposal materials that the Company provides in order to prevent misunderstanding or information distortion.
- 3) You must deliver your services and meet the needs of customers on the basis on sincerity.
- 4) You should heed, follow up on, or coordinate with the section in charge of solving complaints. You must uphold fairness for all parties concerned.
- You should acquire new knowledge and study innovation to improve your service capability.

⁷Consumer means the Company's customers, e.g., policyholders, those related to the policyholders, those who hold the unit trusts, etc. ⁸Products and services means life insurance policies of the Company and its financial planning services.



Examples

Case 1

A customer walks in at our Head Office to ask about a new product that has been recently launched. As a customer service representative who does not know the product's details, what should you do in this situation?

Advice

- 1. Give a brochure to the customer.
- 2. Ask your coworker who has studied this product's features to take care of the customer. You need to introduce her to the customer.
- 3. If the customer wants to know more details, you should consult with the section in charge to obtain the requested information. If the customer wants to know technical information, you should seek help from the actuarial department, for example. You need to tell the customer about which department you are referring he/she to.
- 4. After that you should try to learn more about and keep yourself updated on new products or knowledge so that you can provide quality services to customers.





Case 2

There is a prospect customer who is interested in life insurance. As a life insurance agent, what advice should you give to her?

Advice

- 1. You must explain about policy coverage and benefit accurately and thoroughly.
- When presenting products and services, you should use sales proposal materials that the Company provides in order to prevent misunderstanding or information distortion.
- You must neither present policy information that is outside the scope of coverage nor distort its details.
- 4. You should advise her to take on insurance that matches her income level. Once the contract is entered into by both parties, she has to pay premiums according to the policy's terms of payment.

10. Conducting Businesses Overseas

When conducting businesses overseas, the Company is determined to comply with applicable laws of the countries in which it operates and performs its duty as a good citizen. It also takes into account local environment, culture, and traditions.



Guidelines:

- 1) You must comply with applicable laws of the country in which the Company operates. In the event that the Company's regulations are stricter than those of the foreign country, you must adhere to the Company's regulations.
- 2) You should study changes in laws imposed in the country in which the Company operates on a regular basis. When in doubt, you can consult with the Legal Office or persons in charge of legal affairs.
- 3) You should take careful actions and must not breach applicable laws of the country in which the Company operates. You should respect the local culture and traditions while residing in that country.



Examples

Case 1

You work in a foreign country in which the Company's business operates. Local people there do not comply with the traffic rules. What should you do?

Advice

You should be more careful while using roads, whether walking, driving, or being a passenger in a vehicle. You must strictly comply with the traffic law.

11. Trade Competition

The Company operates on the basis of integrity and honesty. It supports free and fair competitions and does not undertake any actions which are in breach of the antitrust law. It does not carry out any actions in the unfair manner that could cause its competitors their business.



Guidelines:

- 1) You must not enter into any kinds of agreement with a competitor or individual which could create unfair competition.
- 2) You should not search for confidential information of competitors using dishonest, illegal, or inappropriate means.
- 3) You should refrain from attacking competitors' products or services, either verbally or in writing, in an unfair manner. You should not illustrate a comparison of any kinds that could cause a misunderstanding on the part of the audience.

Examples

Case 1

Your customer asks you to compare the Company's products to those of its competitors. As a product advisor, what should you do?

Advice

You should only provide her with the competitors' information that can be acquired from a trusted source, e.g., on competitors' websites, etc. You opinions about their products or services must include facts only.



"Right is right even if no one is doing it."
Wrong is wrong even if everyone is doing it."

Professor Sangvian Indaravijaya

