

## No Gift Practice

The company realizes that an act of giving/receiving gifts, assets or other interests and entertainment might be a channel of corruption. However, establishment of good relationship with business partners, distributors, business allies and government agencies are important for business operation. As a result, the company determines the guidelines on giving/receiving of gifts, assets or other interests and entertainment for the directors, the management and the employees to follow with transparency and expression of kindness in various occasions as appropriate, in accordance with the announcement of the National Anti-Corruption Commission. For such giving/receiving of gifts, assets or other interests and entertainment, any behaviors showing corruption shall not be conducted in order to gain interests in an indirect manner.

### 1. Giving gifts, asset or other benefits

The directors, the management and the employees can give any gifts, assets or other interests traditionally or on occasions as appropriate. Such giving should be done in the form of promoting the company's image, and shall not be in breach of relevant laws. Also, it must not be done with an intention to persuade the receiver to provide facilitation or advantages over the competitors, or reverse the company's wrong action to the right one. Therefore, the company defines the guidelines on giving of gifts, assets or other interests as follows: -

- 1.1 The giving of gifts, assets or other interests on behalf of the company can be done upon order or approval in accordance with the company's authority regulations. Such giving should be made in public and can be disclosed to the employees or other persons.
- 1.2 Any gifts, assets or other interests given to a government official, a state enterprise official or a government agency should not exceed the amount to 3,000 baht / piece / person / project. If necessary, the giving exceeding the amount to 3,000 baht shall be approved by the chief executive officer.
- 1.3 The giving of gifts, assets or other interests to a person or juristic person who/which is not a government agency, government official or state enterprise official, the amount can be considered in accordance with the company's authority regulations.
- 1.4 The abovementioned practices shall not be in breach of the announcement of the National Anti-Corruption Commission regarding the regulations of receiving of assets or other interests with government officials' morality.
- 1.5 To request for approval of withdrawing expenses to procure gifts, assets or other interests, the following guidelines is defined for compliance. (The process of giving gifts, assets or other interests in accordance with the annex 3.1 and 3.2): -
  - 1.5.1 A memorandum shall be made to request for approval in accordance with the company's authority regulations. In the event that the gift, asset or other interests are given to a government official or government agency and have the amount exceeding 3,000 baht, such giving shall be approved by the chief executive officer.

- 1.5.2 After approval of the memorandum, the requesting department can provide the gift, asset or other interests in accordance with the company's procurement handbook.

## **2. Receiving the gifts, asset or other benefits**

The company does not allow the directors, the management and the employees to receive any gifts, assets or other interests from customers, distributors and business allies, except that such receiving is done traditionally or on occasions as appropriate. This is to prevent any frauds, bribes or bad intentions to persuade the employees to provide facilitation or reverse the wrong action to the right one. Therefore, the company determines the following guidelines on receiving of gifts, assets or other interests. (The process of receiving gifts, assets or other interests in accordance with the annex 3.3): -

- 2.1 The employees can receive any gifts, assets or other interests on traditions, festivals or important days and on occasions as appropriate and traditionally, in order to keep a good relationship between organizations or persons. Such receiving shall be made with transparency. It must be ensured that the receiving will not affect or influence on decision making regarding the company's operation and business. Also, it shall not cause any risks of fraud, bribery or corruption.
- 2.2 The employees or the management shall receive any gifts, assets or other interests on behalf of the company and shall report such giving to their supervisors. The giving should be made in public or can be disclosed to the third party. In the event that the supervisor considers that it is inappropriate to receive such gifts, assets or other interests, the receiver shall return them immediately to the giver. If they cannot be returned, the employee shall report to the supervisor.
- 2.3 Upon receiving of gifts, assets or other interests, the director, the management and the employees shall give them to the operation department, and record register to be evidence for receiving, controlling and disbursement of gifts, assets or other interests within one day after receiving. The operation department shall gather the gifts and manage them for public interests.
- 2.4 In the event that consumer products, food, snacks or miscellaneous goods used as the giving company's media for public relations, the receiving department is allowed not to make and submit a report of giving/receiving of gifts, assets or other interests to the operation department. The receiving department has a discretion to manage, receive as personal gifts or distribute them within the department or to other departments.

## **3. Promotional Gifts from Purchases of Products and Services**

The company recognizes that promotional gifts from purchases of products and services are tools for promoting products, encouraging customer acceptance, or incentivizing repeat purchases. The following guidelines are established for handling promotional gifts from purchases in accordance with annex 3.4:-

- 3.1 Upon any purchases in accordance with the procurement manual, if a seller intends to offer promotional gifts that are not of the same type as the purchased items, the department receiving

the gifts must forward them to the operation department. The operation department will record the gifts in a control register to serve as evidence of receipt, control, and disbursement of the gifts.

- 3.2 The operation department will store the promotional gifts mentioned above to be used as awards or gifts for employees on special occasions or company festivals.
- 3.3 For consumable gifts such as food, snacks, beverages, or items used for company promotion, the receiving department does not need to notify the operation department. The receiving department may use discretion to manage these gifts personally or distribute them within their department or to other departments.

#### **4. Entertainment**

The company realizes the importance of good relationship with its stakeholders. Therefore, the following guidelines on entertainment in accordance with annex 3.5 are specified: -

- 4.1 The expenses for business entertainment, such as food and beverage, sports and recreation activities, the other expenses directly relevant to the business operation or trade custom as well as the act of giving knowledge and understanding of business can be done with reasonable payment and without effects on the receiver's decision or conflicts of interest between companies, receivers or other relevant third parties.
- 4.2 The withdrawal of such payments can be made in writing by specifying names of the provider and the receiver of such entertainment as well as clear objectives. Then, the approval should be made in accordance with the company's authority regulations.

#### **5. Prohibition of giving or receiving gifts, asset or other benefits and entertainment**

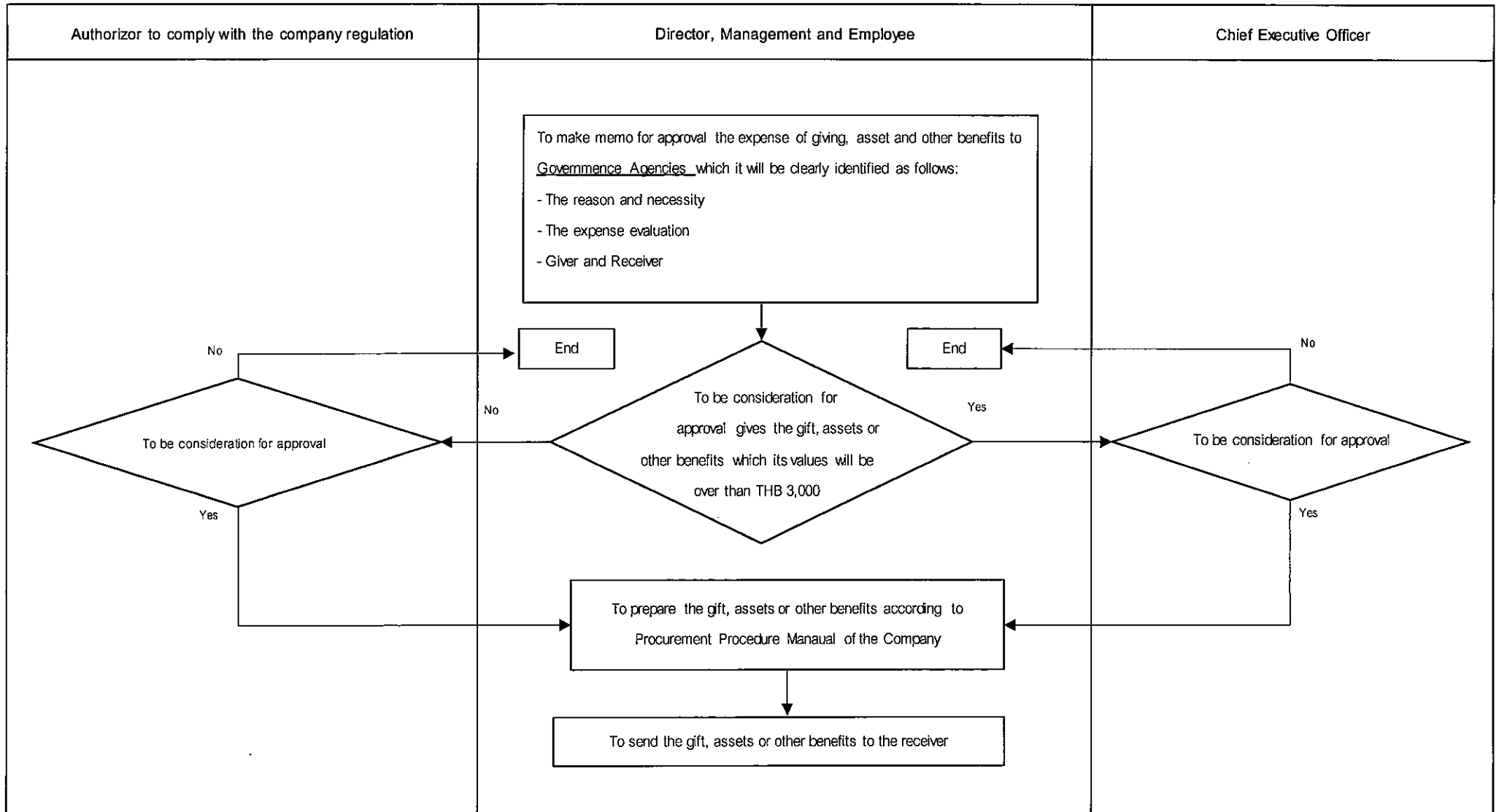
The company determines the prohibition for the directors, the management and the employees on giving/receiving of gifts, assets or other interests and entertainment as follows: -

- 5.1 The directors, the management and the employees are not allowed to give/receive money, assets or other interests to/from any persons who have an intention to persuasively perform an operation, disregard duties or commit any actions in the scope of illegality and fraud, both to the face and behind the back.
- 5.2 The spouses, the children and the family members of the directors, the management and the employees are prohibited to operate or behave as an agent to give/receive gifts, assets or other interests in the form of cash, check, bond, stock, gold, jewelry, real estate or other similar things to/from any stakeholders involved in their cooperation with any government or private agencies in order to persuade decision making, perform or neglect to perform any actions which lead to improper operations and gain improper interests which might cause risks of giving/receiving bribes or corruption, to persuade decision making on business, or to cause incorrect and improper trading operation.

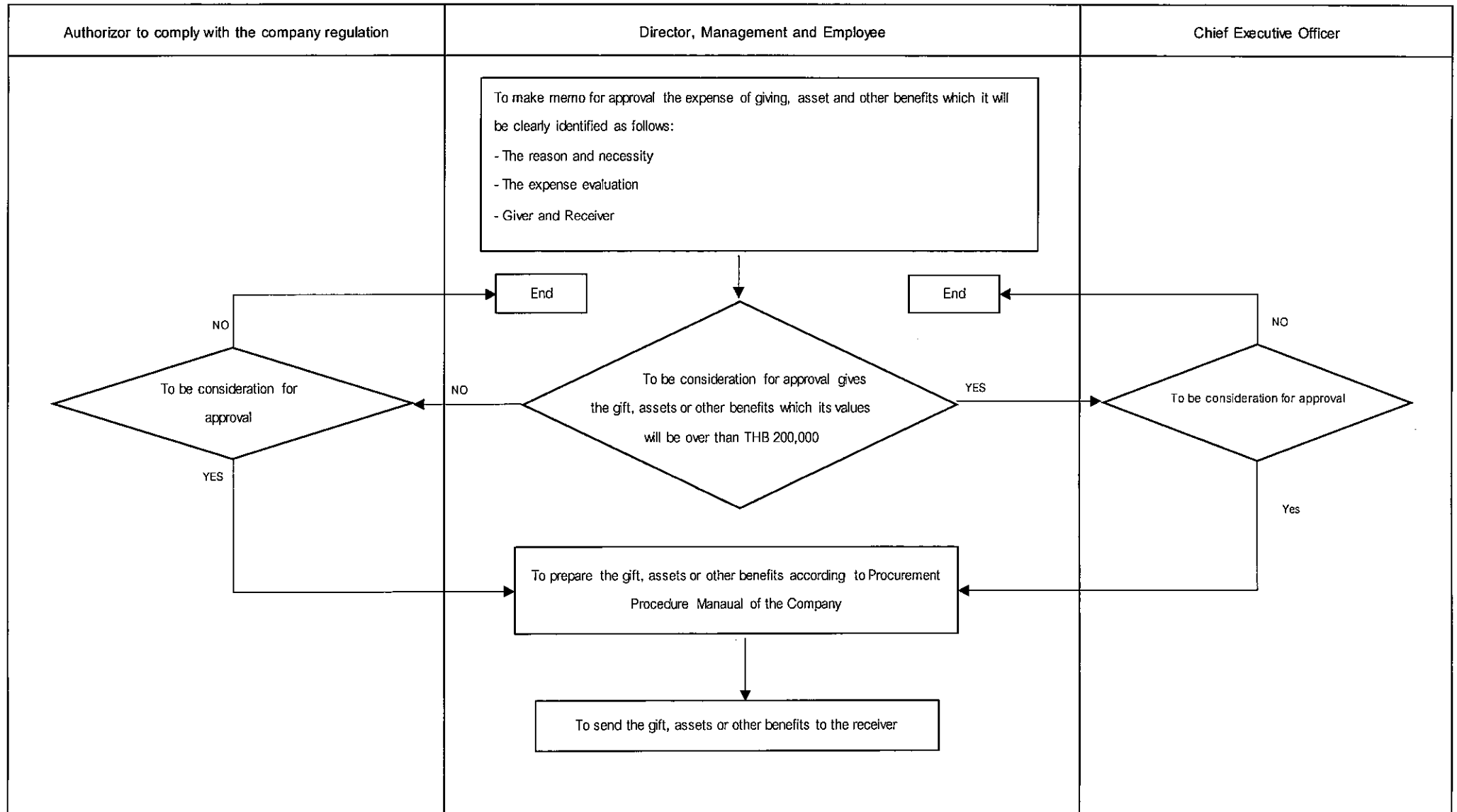
- 5.3 The directors, the management, the employees, their spouses, their children and their family members are not allowed to be an agent to offer giving/receiving of assets, objects or any other interests to/from those relevant to the business, government agencies or other organizations in exchange for improper privileges or to make a government official neglects to perform in accordance with the rules, regulations and laws.
- 5.4 The directors, the management and the employees are not allowed to organize entertainment or attend entertainment in order to ask for assistance or persuade decision making of government officials, partners or business agents or make influence over decision making on business.
- 5.5 It is prohibited to organize entertainment at the places in scope of sexual indecency and sexual services.

### 3. Process of No Gift

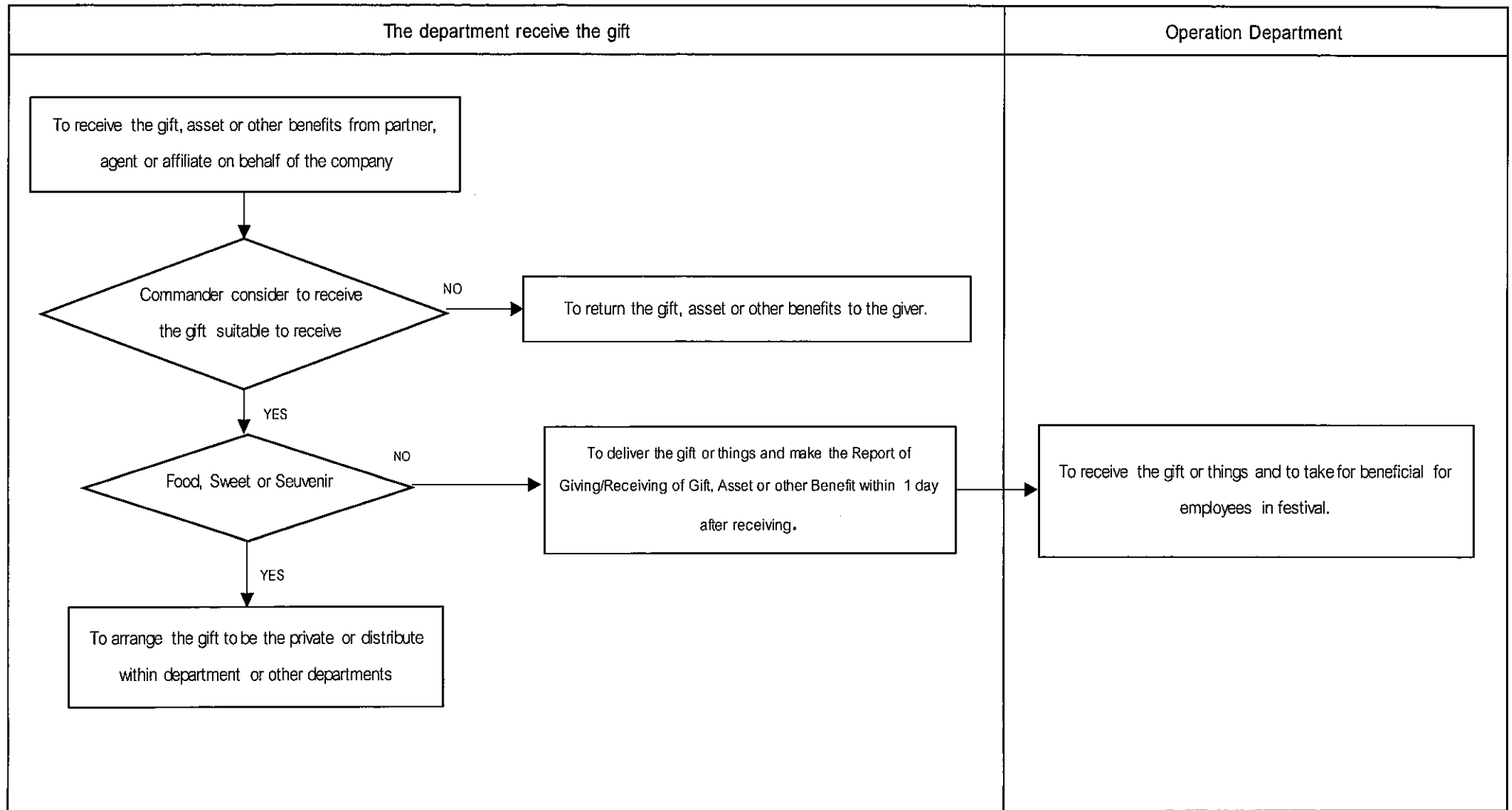
#### 3.1 Process of giving the gift, asset or any benefits (In case that the receiver is the government sector)



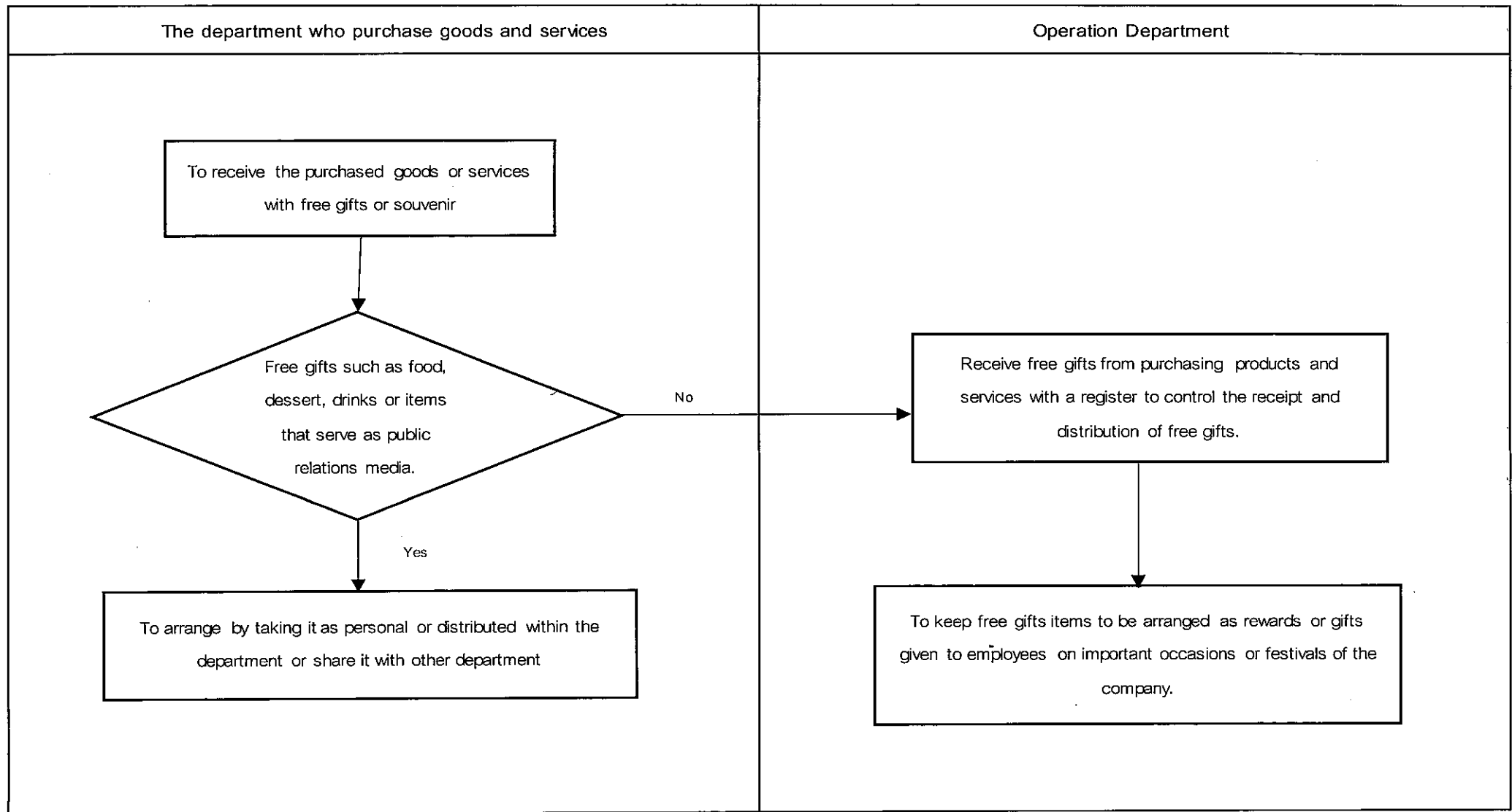
### 3.2 Process of giving the gift, asset or any benefits (In case that the receiver is the private sector)



### 3.3 Process of receiving the gift, asset or any benefits



### 3.4 Process of receiving the promotion gifts or souvenir from purchasing goods and services





3.5 Approval Procedure for entertainment

