



**POLICY AND GUIDELINES ON GIFTS, HOSPITALITIES AND OTHER BENEFITS**  
**TRIPLE I PUBLIC COMPANY LIMITED AND ITS SUBSIDIARIES**

Tripple i Public Company Limited has revised the Anti-Fraud and Corruption Policy and adopted the Anti-Fraud and Corruption Handbook, the Code of Conduct and other written policies and regulations. These are to be similarly enforced on the conducts of directors, executives, employees and relevant parties in the Company and its subsidiaries. Hence, the Company's Board of Directors resolves to implement the Policy and Guidelines on Gifts, Hospitalities and Other Benefits to provide clear practice and behavioral guidelines for the Company's personnel leading to the long-term sustainability.

**Policy**

The directors, executives, employees and relevant individuals of the Company and its subsidiaries (the 'Company') must conduct business in the rightful and transparent manners. It shall be ensured that all conducts raise no doubts and questions or reputational damages on the Company in all forms. All donation transactions including charitable and political contributions, business-related gift giving and sponsorship for activities must be made under the strict and robust supervisory mechanism and measure. There shall be no acceptant of or demand for monetary, material nor other benefits from any parties with intent on persuading to act or overlook on wrongdoings. There shall be no giving or offering to give monetary, material nor other benefits from the parties involving in the business dealings with the Company including individuals, legal entities, or any public, private and charitable organizations.

**Practice Guidelines**

**1. Giving-receiving of Gifts, Souvenirs or Other Benefits**

- (1) Giving and receiving of gifts, souvenirs and other benefits in line with the tradition and/or business culture is permitted if allowed by law and local cultures and values. For example, the value of the benefits shall not exceed 3,000 Baht per person per occasion as stipulated by the National Anti-Corruption Commission's announcement. The following Company's image-building gifts shall be given;
  - (1.1) Calendars, diaries and notebooks,
  - (1.2) Company products,



- (1.3) Promotional merchandises with corporate logo/brand,
- (1.4) Products from the Royal Project Foundation, royal initiatives, local communities of the Company's premises along with the products for charitable, public and sustainable development causes.
- (2) All gift and souvenir giving shall be considered using the same consideration standard to avoid impartiality.
- (3) Gifts, souvenirs, assets or other benefits shall not be given to the spouse, children or individuals who have relationship with the government officials, customers, business partners and the contacted individuals as it may be considered as gift-giving by proxy.
- (4) Souvenir giving during important business occasions based on the culture or business tradition such as the organization's founding day and contract signing can be made. For the souvenir with a value in excess of 3,000 Baht, the superior officer or the Legal and Corporate Governance Department shall be asked for approval based on the Company's regulations. The souvenir giving must be made in the name of the Company or its subsidiaries and verifiable evidence must be provided.

N.B. 'Traditions' mean cultural events or important dates which traditionally entails the giving of gift. The definition also includes the occasions to express congratulatory, gratification, welcome, and sympathy. Additionally, the assistance given as per society's tradition. All of which may be referred from the Cabinet Resolution on the Government Officials' Giving or Receiving of Gifts B.E. 2544)

## **2. Hospitalities**

Payments for business hospitalities such as food and beverages, sport events and other direct expenses for business operations or expenses in line with business cultures and traditions are permitted. Nevertheless, such payments must be within a reasonable amount and shall not cause undue influence on work decisions nor conflict of interests.



### **3. Participations in Corporate Social Responsibility (CSR) Activities with Government Officials or Organizations.**

- (1) It is permitted to participate in CSR activities with government officials or organizations as appropriate. The participations must be on behalf of the Company and the participated activities must be in line with the Company's CSR Policy. There shall be terms, plans and measurable indicators for the participated activities which comply with the Company's process and regulations.
- (2) CSR or other activities held on the Company's behalf must not involve in the support for political parties.

### **4. Receiving of Gifts, Souvenirs or Other Benefits**

- (1) Cash or cash-convertible items from the customers, business partners, business representatives or individuals involving in business dealings with the Company along with from the superior officers, subordinates, and work colleagues cannot be accepted by the directors, executives and employees.
- (2) The directors, executives and employees may accept items for personal use from the customers, business partners, business representatives or individuals involving in business dealings with the Company along with from the superior officers, subordinates, and work colleagues. However, such items including gifts or hospitalities must not be valued higher than 3,000 Baht as per specified by the National Anti-Corruption Commission's announcement. Items in excess of 3,000 Baht value must be given to the superior officer and/or the Legal and Corporate Governance Department to be returned to the givers or for other appropriate actions.
- (3) For food items with the expiry date within 1 month, the superior officer may exercise discretion in the management of the received gift.
- (4) Calendars, diaries produced for the company's promotional purpose may be kept for personal use by the employees.
- (5) Gifts and souvenirs given on the organization-to-organization basis such as those given during the contract signing can be accepted and shall be the property of the Company.



## **5. Accepting Offers on Meetings, Trainings, Seminars and Business Visits on Business Partners' Expenses.**

- (1) Accepting offers on meetings, trainings, seminars and business visits on business partners' expenses is permitted if the acceptance falls within the provisions stated in the contract. However, it shall not be for a covert tourism purpose. For the offers on meetings, trainings, seminars and business visits on business partners' expenses can be accepted if the offers in question is considered to be appropriate and beneficial to the Company. In such cases, the approval must be sought from the superior officer and must be in compliance with the Company's regulations.
- (2) Never accept offers with a covert tourism purpose without a genuine educational/skill development purpose.

## **6. Sponsor Payments for Government Official's Transportation and Other Expenses**

Sponsor payments for government official's transportation and other expenses can be made as appropriate and must be in compliance with the Company's regulations and approval authority.

## **7. Donations and Contributions to the Government Agencies and Officials and Charitable Organizations.**

Can be made under the following conditions;

- (1) A reputable organization and/or legally registered.
- (2) The contributions/donations must be made in the name of the Company and must be transparent, legal and in compliance with the Company's regulations and approval authority.
- (3) No direct personal payments shall be made to the government officials or individuals unless the request for such payment is clearly stated in the donation request letter and the written evidence for donation request is provided.
- (4) There shall be monitoring process to ensure that the donations and contributions are used in accordance to the donated objectives/ for the benefits of the public causes and/or for the stated support.



The Company's personnel must have an understanding and conduct themselves in compliance to the Policy and Guidelines on Gifts, Hospitalities and Other Benefits. Any enquiries can be made to the Company's Legal and Corporate Department.

This policy is effective from 9 November 2021 as per approval of the 9/2564 board of directors meeting.



## Appendix 1

### Examples on Gift and Hospitality Receiving and Giving Situations

1. Question: If I win a gift from a lucky draw at a large-gathering event, can I keep the gift for myself?

Answer: Lucky draws are, by design, used to avoid influence by human decisions. Hence, the you may keep the gift for yourself. If the won gift is in high value, please consult with your superior officer for the appropriate practice and to ensure that the gift does not create undue influence on any decisions.

2. Question: Can I accept concert or sporting event tickets from the customer/business partner?

Answer: You may not accept the tickets if such tickets are given specifically for you. It can be accepted if the tickets are given on an organization-to-organization basis. The given tickets must be distributed in an appropriate method such as lucky draw for example. If the given tickets are in high value, please consult with your superior officer for the appropriate practice and to ensure that the gift does not create undue influence on any decisions.

3. Question: Can I provide sport hospitalities to the government officials?

Answer: Hospitalities can be provided for regularly hosted sporting events. Plans must be submitted for the approval by the superior officer. The plans may be in a form of annual plan which states the scope, budget and clear details for transparency. Avoid the hospitalities during the business negotiation or contract signing periods which may causes undue influence on decisions and potential misunderstanding on the third parties.

4. Question: Can I host 'Thank-you' parties or events for the customers?

Answer: Customer's appreciation events are considered as promotional activities providing occasional special benefits to the customers. These activities may incentivize the customer demand in the Company's products and services which is a normal business practice. The hosting department shall adopt a clear, transparent and accountable terms for the activity hosting.

5. Question: If I am uncertain about my decision, what should I do?

Answer: Use the principle of ordinary prudence to answer the following questions;

- Is the action against the law? If so, do not execution the action.



- Is the action against the Company's and its subsidiaries policy? If so, do not execute in the action.
- Is the action against the practice guidelines or the culture of the Company and its subsidiaries? If so, do not execute the action.

6. Question: Can a member of my family seek or receive gifts, assets or other benefits from the contractors, customers, vendors, co-investors or other parties relating to the Company's business operations?

Answer: Your family members including your spouse, children, mother and siblings are forbidden from doing so in any circumstances as there may cause undue influence, prejudice or conflict of interest on your work conducts.