

Gifts and Hospitalities Procedures

The Company has established procedures to ensure that providing and accepting gifts and hospitalities is done through a standardized process, is transparent and is not done with any expectation of favorable treatment in return that may appear as corruption, as follows:

1. Gifts

1.1 Definition

Gifts are anything that the Company provides or receives to/from external parties such as vendors, services providers, financial institution officers, officers of government agencies, state-owned enterprises, government-owned entities, officers of other organizations or the general public, to foster good relationships in an acceptable manner with appropriate value and timing as well as in accordance with traditions and applicable laws.

1.2 Gift Providing and Accepting Guidelines

- A. The providing and accepting of gifts must be conducted according to tradition while being transparent and not impacting the Company's operations and business decisions as well as not being used for any expectation of favorable treatment in return that may appear as fraud or corruption.
- B. The providing and accepting of gifts must be in compliance with applicable laws, rules and regulations as well as aligned with related policies of the Company.
- C. The providing and accepting of gifts must be conducted on behalf of CPALL only.
- D. The providing and accepting of gifts must be conducted appropriately, with a value not exceeding THB 3,000. In the case where the amount of the gift exceeds THB 3,000, **the Division Head and Benefits and Gifts Committee for amounts exceeding THB 3,000** must be informed to provide approval of such gifts. The providing and accepting of gifts exceeding THB 3,000 must comply with relevant laws, especially in dealing with government officers.

Examples of gifts that can be provided and accepted are as follows:

- Any gifts used for the Company's advertisement or in support of sales in small values (such as pens, stationery, jackets and t-shirts, all with the Company's logo.)
- Gifts or gift baskets during festive seasons
- Trophies or awards

Examples of gifts that cannot be provided and accepted are as follows:

- Cash or cash equivalents such as Cheque, Voucher, Gold and Real estate

1.3 Gift Providing Procedures

- A. The requestor must provide all supporting documents to his/her Management for review prior to submission to the authorized person, based on the Company's Authorization Matrix, for approval.
- B. The authorized person reviews all supporting documents to ensure its objectives and approves as deemed appropriate.
- C. The requestor declares all expenses and provides all supporting evidence of gifts provided (such as receipts) to the Accounting Department.
- D. The Accounting Department reviews the evidence relating to the gifts provided and may request for additional details and evidence when the provided evidences are insufficient. If it is found that the gifts provided do not align with the Company's procedures or are used for corrupt purposes, the Company shall apply the strongest enforcement action against the wrongdoer.
- E. The Internal Audit Office annually evaluates the gift providing process to ensure the efficiency, effectiveness and appropriateness of the internal controls of the process.

1.4 Gift Accepting Procedures (for gifts with value exceeding THB3,000)

- A. The recipient function must prepare the Benefits / Gifts Form, which include the details of the gifts received, and submit to his/her Division Management for approval.
- B. The Head of Division reviews details of the gifts received to ensure its objectives and approves as deemed appropriate as well as submits the approved form to the **Benefits and Gifts Committee for amounts exceeding THB 3,000.**
- C. The recipient function must send the gifts received to the central function as designated by the Company (HR Governance Center – for CPALL or HR Function for Subsidiaries).
- D. The designated central function reports the gifts received with values exceeding THB 3,000 to the Corporate Governance Committee on a quarterly basis.
- E. The Internal Audit Office annually evaluates the gifts acceptance process to ensure the efficiency, effectiveness and appropriateness of the internal controls of the process.

2. Hospitality

2.1 Definition

Hospitalities are food, beverages, accommodations, transportation expenses or other types of expenses the Company provides to external parties involved with the Company in order to foster good relationships in an acceptable manner with appropriate value and timing as well as in accordance with traditions and applicable laws.

2.2 Hospitality Guidelines

- A. Hospitalities can be provided according to tradition while being transparent and not impacting the Company's operations and business decisions as well as not being used for any expectation of favorable treatment in return that may appear as fraud or corruption.
- B. Hospitalities provided must comply with the laws, rules and regulations as well as align with related policies of the Company.
- C. Hospitalities must be conducted on behalf of CPALL only and must be provided in the presence of staff at the Assistant General Manager (AGM) level and above. The Supervisor must also consider the appropriateness of the number of CPALLs' personnel involved.

2.3 Hospitalities Procedures

- A. The requestor must provide all supporting documents to his/her Management for review, including name, workplace, and position of external parties receiving hospitalities and the names of CPALL personnel involved as well as any receipts in order to submit to the authorized person, based on the Company's Authorization Matrix, for approval.
- B. The authorized person reviews all supporting documents to ensure its objectives, approves as deemed appropriate, and sends the documents to the Accounting Department for further processing.
- C. The Accounting Department reviews the evidence provided and may request for additional details and evidence when the provided evidence is insufficient. If it is found that the gifts provided do not align with the Company's procedures or are used for corruption purpose, the Company shall apply the strongest enforcement action against the wrongdoer.
- D. The Internal Audit Office annually evaluates the hospitalities process to ensure the efficiency, effectiveness and appropriateness of the internal controls of the process.