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**AAI – 044 – 2022**

**Practice on Giving or Receiving Gifts, Assets or other Benefits**

**(Revised edition B.E. 2566)**

Asian Alliance International Public Company Limited and its subsidiaries (the “Company”) realizes the importance of avoiding any act which may lead to conflict of interest or discrimination and may cause damage to the Company’s operation as well as ensuring an appropriate practice and work instruction to prevent corruption, especially when giving or receiving a gift, asset or other benefits of the Company. The Company has identified the practice for giving or receiving gifts, assets or other benefits as follows:

**Policy for Giving or Receiving Gifts, Assets or other Benefits**

Giving or receiving gifts, assets or other benefits can be made in a proper manner with a suitable value of the gifts, and must not demand to give or receive, or promise to give or to receive gifts or assets or other benefits in all cases which may influence any decision making of the receiver. Therefore, this must be aligned with the practice of giving or receiving gifts, assets or other benefits.

**Definitions**

“Tradition” means the festival or any special days for giving a gift to each other and any occasion to congratulate, offer gratitude, welcoming, condolence or assistance with the socially practiced etiquette (reference to the Prime Minister’s Office Regulations on Giving or Receiving Gifts of the Government Official B.E. 2544 (2001)).

**Practices**

1. The directors, executives, employees and the consultant of the Company and its subsidiaries must not request or receive any monetary benefit, gift or asset or other benefits from any persons or juristic person whom the Company is dealing with.
2. The directors, executives, employees and the consultant, and their family members, of the Company and its subsidiaries, must not request or receive any gift, asset or other benefits from the contractor, sub-contractor, customer, business partner or any related person with the Company’s business in all cases.
3. The directors, executives, employees and the consultant of the Company and its subsidiaries must not bribe or give other similar reciprocal benefits to the Company’s personnel or outsiders, especially government officials. Giving gifts, assets or other benefits to government officials inside and outside the country must ensure it does not violate any law and local customs and traditions.
4. The directors, executives, employees and the consultant, and their family members, of the Company and its subsidiaries must not give or take any things or benefits from any business partner or related persons with the Company’s business except for the benefits in a normal business operation, or in any festival or tradition.
5. Dealing business with any working unit such as government units, state enterprise, private sector both inside and outside the country must be done with transparency, equitability, compliance with laws of Thailand and laws of the country the Company is dealing with.
6. The responsible unit dealing with business partners, customers, joint investors or any related person with the Company’s business must notify those persons about this Practice to be complied with regularly.
7. In case the directors, executives, employees and the consultant of the Company and its subsidiaries intentionally ignore, or do not follow this practice, they shall be considered a person who does not align their performance with the specified rules and regulations of the Company and may be investigated and taken into disciplinary action according to the Human Resources Procedures of the Company.

8. The directors, executives, employees may give or take a gift from the business alliance in the following cases

8.1 Giving a gift, asset or other benefits during the festive season, such as New Year's festival, or congratulations in any occasion can be made provided that the value of the gift is aligned with the Management Approval Authorization, except gifts for any governmental unit that must not be more than 3,000.- baht (three thousand baht) and only made under the Company's name with the clear objective, auditable evidence and making the reimbursement according to the Company's procedure.

8.2 Receiving gifts, assets or other benefits during the festive season or special occasions, the receiver must consider for the value of such gifts, assets or other benefits that should not more than 10,000.- baht (ten thousand baht) and the Department Manager or higher must sign to receive. In case the supervisor does not accept the gift, asset or other benefits because its value is higher than 10,000.- baht (ten thousand baht) or if it is undeniable and has to receive that gift with value more than 10,000.- baht (ten thousand baht), then the receiver must fill out the gift-receiving form and forward it gift to the Human Resources Department whereas the gift will be registered and proposed to the Board of Directors for approval to be used as gifts for employees, or used as a prize in any special event, or for donations, or other purposes for the benefits of the Company in the overall picture.

8.3 The personnel of the Company and its subsidiaries must not give a present to their supervisor even though the supervisor is agreed to do so and the supervisor must not agree if his relatives will receive a present from the subordinates except for the normal traditions where we give a present to each other but the value of the present must not be higher than 3,000.- baht (three thousand baht).

8.4 Giving a present or traditional souvenir can be made without any violation of any relevant laws. The present value must align with the specified regulations and must not be costly. Giving a present as a tradition must be stopped if it affects the decision making in the business operation. A present may be in any form that helps promote the good image of the Company as follows:

- 8.4.1 Calendar, Notebook
- 8.4.2 Product of our group of companies
- 8.4.3 Products used for the Company's public relations (Corporate Logo/Corporate Brand)
- 8.4.4 Products from the Royal Project, the Royal Initiative Project, local products in the area the Company is operating or products for donation or public benefits or products which promote sustainability.

9. Giving a present or souvenir must be based on the same standard to avoid any discrimination.

10. The business entertainment expenses such as food and drinks, entertainment in the form of sports and other expenses directly related to the business operations or trade tradition including educating for business awareness can be made at a reasonable cost and must not affect the decision making in the operations or cause any conflict of interest.

11. Organizing the CSR activity with a government unit or official.

- 11.1 Organizing the CSR activity with a government unit or official can be properly made under the name of the Company or its subsidiaries and its objective must be aligned with the Company's sustainability policy and corporate social responsibility policy. However, there must be clear planning and operation through the process and regulations specified by the Company.
- 11.2 Preparing the CSR or other activity under the name of the Company or its subsidiaries must exclude any support to the political activity.

12. Accepting a meeting proposal, training, seminar and visiting the business partner's premises at their expenses.

- 12.1 Accepting a meeting proposal, training, seminar and visiting the business partner's premises at their expenses can be made if this is under the agreement specified in the contract but it must not be a hidden agenda for travelling purposes.
- 12.2 In case it is not specified in the contract, then accepting a meeting proposal, training, seminar or visit to the business partner's premises at their expenses will not be possible; only if such acceptance will be appropriate and fruitful for the Company or its subsidiaries, then it must be approved by the supervisor and must be aligned with the Company's regulations.
- 12.3 Do not accept a training proposal or seminar with a travelling hidden agenda without an intention of true knowledge transfer.

13. Sponsoring for travelling and other expenses for a government official can be made as deemed appropriated but it must be approved by the supervisor and follow the Company's regulations.
14. Donations and support to any governmental body or official and other charity foundation must be made under the following conditions:
  - 14.1 Those organization is reliable and/or established legally.
  - 14.2 It must be made under the name of the Company or its subsidiaries with transparency, compliance with laws and by the Company's regulations.
  - 14.3 The payment must not be made directly to any government official or any person as an individual except where there is an official letter request for such support and written evidence of such support.
  - 14.4 There should be monitoring to ensure the donation and/or the support has truly been used for the social benefits and/or aligned with the purpose of the donation and/or the supporting.

**\*\*\* If you are unsure about your decision, what should you do?**

**Recommendations:** Do what a normal person would do (questioning to yourself) as follows:

- Is that action violating laws? / If yes, then stop.
- Is that action violating the Company's policy? / If yes, then stop.
- Is that action against the Company's core values or corporate culture? / If yes, then stop.
- Is that action causing any negative effect on the Company's stakeholders? / If yes, then stop.
- Is that action causing any negative effect on the Company's image? / If yes, then stop.
- Is that action leading to bad practice in the future? / If yes, then stop.

This practice was considered and approved in the Board of Directors Meeting No. 5/2023, dated 8 November 2023, which shall come into effect from 8 November 2023 onwards.

- Mr. Vichai Assarasakorn -

(Mr. Vichai Assarasakorn)

Chairman of the Board

Asian Alliance International Public Company Limited