



## **Gifts and Entertainment Policy**

### **Principle**

In order to comply with the Anti-Corruption Policy, Chotiwat Manufacturing Public Company limited (CMC) has formulated guidelines for receiving and offering gifts, entertainment, CSR activities or other benefits as follows.

### **Guidelines**

1. Offer of gifts, souvenirs or other benefits
  - 1.1 Offering gifts or souvenirs in a manner of festive or customary practice is acceptable but must not contravene relevant laws and local customs. For example, for Thailand it is not to exceed 3,000.- Baht per person per occasion, and it should be in a manner that helps enhance the image of the Company as follows.
    - 1.1.1 Calendars, diaries or products bearing the Company's logo or brand.
    - 1.1.2 Products of the Company or its affiliated companies.
    - 1.1.3 Products of the Royal Projects, the Royally Initiated Projects, products of the communities, charity products, public- benefit products or products that promote sustainable development.
    - 1.1.4 Offering and receiving gifts shall not be cash or equivalent to cash such as gift voucher etc.
  - 1.2 Employees shall not offer gifts, souvenirs, properties or other benefits to spouses or children of government officials or to persons related to the government officials, customers, clients or contacts. This is considered receiving gifts via an intermediary.
  - 1.3 Offering souvenirs on important business occasions such as inauguration day or business contract signing day is acceptable. However, if the value of the souvenir exceeds 3,000.- Baht per person per occasion, an approval by a deputy chief executive officer or higher is required.
  - 1.4 Offer of gifts, souvenirs or other benefits shall behalf of the organization and must be declared transparently.



## **2. Entertaining customers**

- 2.1 Spending on business entertainment such as food and beverage, sports and other entertainments directly related to business or customary business tradition is acceptable as well as disseminating business knowledge and understanding on condition that the expenses are reasonable and do not influence decision making or cause conflicts of interest.

## **3. Organization of CSR activities with government organizations or government officials**

- 3.1 Organizing CSR activities with government organizations or government officials can be done as appropriate, however, CSR activities must be conducted on behalf of the Company and the objectives of the activities must be in line with the Company's CSR promoting activities. Moreover, the CSR activities must have clear principles, plans and evaluation, and they must be operated through the steps and regulations specified by the Company and its affiliated companies.
- 3.2 Organization of CSR activities on behalf of the Company or subsidiary company must not be related to any political activities or support for political parties.

## **4. Receiving gifts, souvenirs or other benefits**

- 4.1 The Board of Directors, the management and employees at all levels must not accept gifts, souvenirs, facilities, other benefits whatsoever. However, they should communicate the Company's Gifts and Entertainment Policy to outsiders.
- 4.2 In the case that refusal to accept gifts, souvenirs, or other benefits is not appropriate, the gifts must be small and must be presented to HR department. The central unit must collect the items of gifts and facilities to be given as rewards to employees by drawing lots or to donate to outside individuals or organizations for charity or public benefits except the following:
- 4.2.1 In the case that the gift is food with an expiration date of less than one month, it is at the discretion of the HR department.
- 4.2.2 In the case that the gifts are calendars or diaries used to publicize the company, they can be distributed to employees.
- 4.2.3 Acceptance of gifts or souvenirs on behalf of the organization, such as at a contract signing event is allowed, but the gift or souvenir will be company properties.

4.2.4 In the case of entertainment hosted by customers relating to business without other hidden benefits, employees taking part in the entertainment must identify themselves and must have approval from the respective manager or office in a higher position or from a deputy CEO or higher officer. In addition, gifts or souvenirs received from participation in the entertainment must be presented to the central unit of the Company.

## **5. Acceptance of invitation to a meeting, training, a seminar, or a visit to a business operation at the expense of a business partner**

5.1 Acceptance of an invitation to a meeting, training, a seminar, or a visit to a business operation at the expense of a business partner is allowed if such meeting, training, seminar, or visit is part of an agreement earlier made.

5.2 Invitation to a meeting, training, a seminar, and a visit to a business operation at the expense of a business partner which is not part of an agreement can also be accepted provided that the acceptance is considered appropriate and beneficial to the business of the Company. The acceptance, however, is subject to prior management approval under the regulations of the Company.

5.3 Employees must not accept invitation to training or a seminar with travel leisure as hidden agenda and with no deliberate intention for knowledge exchange.

## **6. Donation and contribution to government organizations, government officials, and charities**

6.1 Donation and contribution to any organization must be made under the following conditions:

6.1.1 The receiving organization must be well-recognized and/or legally founded.

6.1.2 The donation or contribution must be made transparently and legitimately under the regulations of the Company or on behalf of the organization.

6.1.3 The payment must not be made directly to any government official or any person, except the person is clearly specified in the official request for such donation or contribution. A written acknowledgement must be issued following the donation or contribution.

6.1.4 There should be a follow-up process to ensure that donation or contribution is used for public interest and/or truly meets the objectives of the donation or contribution.