

CENTRALPATTANA

Receipt and Offering of Gifts, Hospitality and Other Benefits Policy

Central Pattana Public Company Limited

1. Introduction

To prevent actions that may lead to conflicts of interest, preferential treatment or corruption, and to safeguard transparency, credibility and sustainable business practices, Central Pattana Public Company Limited and its subsidiaries (the "Company") have adopted a strict policy governing the receipt and offering of gifts, hospitality and other benefits, which applies to personnel at all levels. The purpose of this Policy is to uphold the Company's ethical standards, enhance stakeholder confidence and reinforce good corporate governance. It also aligns with the Company's Anti-Corruption Policy and its sustainability goals.

2. Scope

This Policy applies to the Company, including subsidiaries, joint ventures and any business units under its management control. For the purpose of this document, "the Company" refers to any entity that adopts and applies the practices outlined herein to promote transparency and uphold ethical conduct in its operations. These practices are reviewed annually, or as needed, to ensure continued alignment with legal requirements and international best practices.

3. Objectives

To ensure transparency in business conduct, prevent conflicts of interest and reinforce sustainable management. This Policy affirms the Company's commitment to operating with honesty and integrity, in compliance with applicable laws, ethical standards and international standards.

4. Policy

The receipt and offering of gifts, hospitality and other benefits is permitted only under the following conditions:

- 5.1.1) It is conducted on behalf of the Company in a proper, open and transparent manner
- 5.1.2) It does not violate ethical standards, applicable laws or Company procedures, and complies with the regulations of relevant government agencies, state enterprises or other applicable bodies
- 5.1.3) It is appropriate to the occasion, season or local custom and cultural practice
- 5.1.4) It is not intended to influence or support any act of corruption
- 5.1.5) It does not influence business decisions related to the Company's interests, or give rise to a conflict between personal interests and those of the organization
- 5.1.6) It must not be given or received, directly or indirectly, where doing so may affect the Company's business operations

5. Practices

5.1. Receiving Gifts or Other Benefits

- 5.1.1) Employees must refrain from accepting gifts or other benefits from any stakeholder associated with the Company's business during festive seasons or on any occasion. Employees are responsible for communicating this Policy clearly to all relevant stakeholders.
- 5.1.2) If a gift or benefit cannot reasonably be declined or returned, its value must not exceed THB 3,000. Gifts exceeding this amount are strictly prohibited. The recipient must report the gift to their supervisor using the Company's designated reporting form and submit it to the central unit assigned to manage redistribution or charitable donation.

Exceptions to this requirement may be made at the discretion of the relevant line manager, in the following cases:

- 1) Perishable goods or items with an expiry date within six months
- 2) Items intended for mass distribution, promotional activities or corporate giveaways, such as calendars, notebooks, pens, caps, or keychains, with a unit value not exceeding THB 500
- 5.1.3) Gifts, tokens, awards or items received by the Company in connection with competitions, contract signings, or official inter-organizational exchanges may be accepted. Such items will be treated as Company assets.

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5.2. Giving Gifts or Other Benefits

- 5.2.1) The giving of gifts or other benefits in line with local customs may be permitted, provided it does not contravene applicable laws, ethical standards, or Company procedures, and adheres to the regulations of relevant government agencies, state enterprises or other applicable institutions. The value must not exceed THB 3,000 per individual per occasion.
- 5.2.2) A consistent approach must be applied when giving gifts or benefits to prevent favoritism.
- 5.2.3) Gifts or benefits must not be given to the spouse, children or close associates of government officials or other stakeholders, as such actions may be construed as receipt through intermediaries.
- 5.2.4) Gifts or benefits exceeding THB 3,000 may only be given in connection with significant business milestones, such as contract signings, corporate anniversaries or other exceptional and justified circumstances, provided they do not violate applicable laws. Such actions must be pre-approved by the most senior executive of the relevant business unit or the President and CEO.

5.3. Hospitality

Business hospitality extended to stakeholders must be provided only when necessary and appropriate to the circumstances. All hospitality must be conducted in a manner that is culturally appropriate, ethically sound and consistent with local customs. Expenses must be reasonable, transparent and not excessive, and must not create the appearance of offering improper inducements or compromising good governance principles.

Hospitality must not influence any business decision, nor be used to justify conduct that may give rise to a conflict of interest. All hospitality must be reviewed and approved by an authorized person in accordance with Company procedure, with complete and transparent documentation of all related expenses for audit and reporting purposes.

5.4. Acceptance of Meetings, Trainings, Seminars or Site Visits Funded by Suppliers

Acceptance of invitations from suppliers to attend meetings, trainings, seminars or site visits may be permitted if the offer is appropriate and clearly defined, and contributes to the Company's operational effectiveness. The following conditions must be met:

- 5.4.1) The proposed activity must have clear relevance to the development of employees' skills, knowledge or capabilities in performing their roles, and must support the Company's business objectives.
- 5.4.2) Acceptance must comply with clearly defined contractual terms and must avoid any offer that could be perceived as improper inducement or exert undue influence on business decisions.
- 5.4.3) The offer must not include excessive leisure or entertainment. Activities must focus on learning, professional development or business knowledge exchange.
- 5.4.4) Participation must be approved in advance by an authorized person in accordance with Company procedures, with all relevant details recorded in full for audit purposes.

6. Training

The Company communicates this Policy and related practices through a variety of channels, including training sessions, meetings and activities to promote understanding, awareness and compliance among directors, executives, employees and relevant external stakeholders, including suppliers, business partners and other actors across the supply chain.

Content focuses on business ethics, transparency and the avoidance of conflicts of interest, supported by case studies to illustrate practical application in real-world scenarios.

The Company also monitors and evaluates the effectiveness of these communications to ensure they remain relevant to the business context and support consistent compliance with corporate governance standards as well as the achievement of the Company's sustainability goals.

7. Whistleblowing

Company personnel may raise concerns or report observed or suspected breaches of this Policy or related practices, in accordance with the Company's Whistleblowing Policy and reporting procedures. The Company maintains strict safeguards to protect whistleblowers or complainants. All reports will be treated with the highest level of confidentiality, and no adverse action will be taken against individuals that could affect their employment or standing within the organization, either during or after the investigation.

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To foster trust and support effective compliance with this Policy, the Company provides accessible and secure whistleblowing channels, including online systems, email and other designated platforms. A responsible officer or committee is assigned to review and manage all reports in a fair and transparent manner.

8. Disciplinary Action

All Company personnel are required to cooperate fully by providing accurate information and facts during investigations conducted by relevant internal or external bodies. Where a breach or non-compliance with the No Gift Policy or related guidelines is identified, disciplinary action will be taken in strict accordance with the Company's internal regulations.

Disciplinary measures will be proportionate to the severity of the violation and may include verbal warnings, suspension, or summary dismissal without severance. These actions reflect the Company's commitment to upholding the highest standards of ethics, transparency and good governance.

This Policy is effective from May 2, 2025 onward.

This Policy supersedes Operating Procedure No. 1100 81 0662/2014 titled "Receipt and Offering of Gifts, Hospitality or Other Benefits" dated December 1, 2014. All practices shall now follow the guidelines set out in this updated Policy.

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Definitions

Company refers to Central Pattana Public Company Limited and its subsidiaries.

Company personnel refers to all directors, executives and employees of the Company.

Stakeholders refers to shareholders, customers, suppliers, creditors, employees, competitors, government agencies and other related parties.

Gift refers to money, goods, compensation or any benefit given on customary occasions.

Hospitality refers to meals, beverages, services or participation in recreational or sports activities, provided on customary occasions, to external parties who conduct business with, or engage professionally with the Company.

Customary practice refers to long-standing social customs, including festivals, ceremonial events or occasions where gifts are exchanged to express congratulations, gratitude, hospitality, condolences or other forms of culturally accepted etiquette.

Corruption refers to the offering, promising, granting, requesting, giving or accepting of bribes or benefits, monetary or otherwise, either directly or indirectly, or engaging in any behavior that may be perceived as corruption in any form, involving individuals/legal entities, public officials, public service agencies or stakeholders, carried out to gain or retain business, or direct business opportunities to a particular company, or secure any improper advantage in violation of the Company's Code of Conduct and Corporate Governance.