

# Treatment on Gift and Hospitality v2021-1 —11 January 2021—

# Introduction

Namyong Terminal Public Company Limited and its subsidiary ("**the Company**") are aware that establishing a good relationship with business partners is essential in achieving continued success of the Company. In this regard, to ensure that giving or accepting gifts and arrangement of hospitality by the directors, executives, and employees of the Company shall comply with the Company's anti-corruption policy approved by the Board of Directors.

The Executive Committee has approved this guideline which shall be construed as a part of the anti-corruption policy of the Company.

## **Giving of Gift**

- 1. A gift shall be given on behalf of the Company, not by the name of directors, executives, or employees which must be appropriate to occasion, festival and local custom.
- 2. The value of the gift shall not exceed THB 2,000. The giving of the gift shall be approved by the C-level or in case of the C-level, the approval shall be approved by N+1. Name or business unit of the recipient and the reason thereof must be specified.
- 3. The giving of the gift mentioned in 1. and 2. shall not be for the purpose of domination, inducement or exchange for any advantages, or with a hidden agenda in order to receive assistance or benefit.

# **Acceptance of Gift**

- A gift shall be accepted on behalf of the Company, not by the name of directors, executives, or employees which must be appropriate to occasion, festival and local custom.
- 2. Acceptance of gift having the value higher than the value considered to be appropriate to occasion, festival and local custom should be avoided.
- 3. The gift, except fresh food, shall be handed to the Human Resource Department or the responsible person for further arrangement of drawing lots or other methods for the purpose of common interest.
- 4. The acceptance of gift shall not be for the purpose of reciprocal or exchange with hidden benefits.

# Offering or Acceptance of Hospitality

1. A hospitality arrangement shall be appropriate to the occasion, festival and local custom.

Copyright © 2021 Namyong Terminal PLC. All Rights Reserved Classified & Proprietary 2. Offering or acceptance of hospitality shall not be for the purpose of domination, inducement or exchange for any advantages, or with a hidden agenda in order to receive assistance or benefit.

## **Executive and Employee Protection**

The Company ensures that no executives and employees will be punished from refusing to bribery, even though that refusal results in the Company's loss of business benefit. The Company believes that the anti-corruption policy and this guideline will create the value to the Company.

In addition, the Company will not tolerate anyone who threats, menaces, or dissuades the executives and the employees who willfully comply with the anti-corruption policy and this guideline.

In case the executives or the employee are threatened, menaced or dissuaded, such executive or employee shall report to the Human Resource Department or the C-level immediately. If the situation has not been solved, it shall be reported through "Whistle Blowing Channel" of the Company.

#### **Punishment**

The Company will impose a disciplinary punishment to the executives and the employees that violate or omit the anti-corruption policy and this guideline. In addition, the direct supervisor of such persons that ignores such violation or acknowledges the violation but does not take any action will also be imposed with a disciplinary punishment which may lead to termination of employment.

Unawareness of the anti-corruption policy and this guideline or related laws cannot be used as a defense for non-compliance.

## **Inquiries**

In the case the executives and the employees are not certain whether any action may be against this guideline, they shall consult with the direct supervisor or the C-Level.

### Conclusion

#### Implementation of Treatment on Gift and Hospitality

This Treatment on Gift and Hospitality is effective from 11 January 2021 onwards until the Board of Directors approves a new guideline for treatment on gift and hospitality.