



- Translation -

**Message from the Chief Executive Officer  
on the guidelines of Anti-Corruption Policy  
for the acceptance of gifts, hospitality, or other similar forms of reward  
(No Gift Policy)**

The act of giving and accepting a gift or other similar forms of reward or advantage is currently an issue on which all public and private sectors have cast spotlight. A concern is raised that the practice has the potential to initiate any corruption-related activities.

On this account, PTT Global Chemical Group ("GC Group") has established a clear set of guidelines for accepting and offering gifts, hospitality, or other similar forms of reward that are in line with anti-corruption policy attached herewith to demonstrate our commitment in conducting business in adherence to good corporate governance principles and business code of conduct with a clear focus on ethics, social responsibility, and treating all stakeholders equally. Employees of GC Group must strictly comply with and adhere to these guidelines and must not request or accept any gifts, hospitality, or token of appreciation from business partners of GC Group.

This is to avoid any act that may influence decision making, discrimination or cause conflict of interest in order to maintain the highest standards of business effectiveness, and transparency, while preserving integrity within a framework of laws.

*(Signed)*

(Mr. Kongkrapan Intarajang)

Chief Executive Officer

December 16, 2021

Attachment: Announcement of PTT Global Chemical Public Company Limited on guidelines for accepting and offering of gifts, hospitality, or other similar forms of reward



**Anti-Corruption Guideline  
on No Gift Policy  
PTT Global Chemical Group**

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**Objective**

To demonstrate an intention and determination to oppose all forms of fraud and corruption and also to comply with PTT Global Chemical Group's (GC Group's) corporate governance policy, GC has drawn up the Anti-Corruption Guideline on No Gift Policy. Executives and employees at all levels have the duty to integrate this guideline to their work to ensure that GC Group's business operations are transparent and accountable with clear and appropriate standard practices that are in accordance with applicable laws and regulations. This guideline shall be considered a part of GC Group's Corporate Governance and Business Code of Conduct Handbook.

**Definition**

A gift, a souvenir or any other form of benefits refers to money, an item, remuneration or any profit employees receive from or give to others on behalf of the Company or in their capacity as the representative of the Company.

**Principles and Operational Guideline**

**1. Giving of a gift, a souvenir or any other form of benefits**

1.1 Giving a gift, a souvenir or any other form of benefits in line with customs<sup>1</sup> is allowed for as long as such giving does not violate applicable laws, rules, and regulations of Thailand and other foreign countries. For example, an announcement of the Thailand's National Anti-Corruption Commission limits the value of gifts for a government official to no more than 3,000 baht per person per occasion. Also, a gift, a souvenir or any other form of benefits given to an outsider must complement the image of the Company and GC Group as follows:

1.1.1 Calendars, diaries, and Company Products

1.1.2 PR products of the Company and GC Group (with Corporate Logo/Corporate Brand)

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<sup>1</sup> **Customs** refer to gift-giving done to mark a festival, an important day, or an occasion for congratulations, expression of gratitude, expression of condolences, or delivery of help based on social etiquettes (Reference: The Office of the Prime Minister's Regulation on Government Officials' Gift Giving and Receiving B.E. 2544).

1.1.3 Products from royal development projects, community products from the Company's and GC Group's operating areas, charity products, or products supporting public benefits or sustainable development

1.2 Giving a gift, a souvenir or any other form of benefits on important business occasions such as an establishment anniversary and contract signing is possible. If the value of gift is lower than 3,000 baht, an approval for the giving must be sought from a vice president or equivalent. If the value of gift is 3,000 baht or more, an approval must be sought from the top executive of each business line/business unit or the top executive of the Company or any GC Group.

1.3 Giving a gift, a souvenir or any other form of benefits to the spouse, child, adoptive child, or any related party of a government official, customer, supplier, or a contact person is prohibited, because such action is seen as giving via another person.

## **2. Receiving a gift, a souvenir or any other form of benefits**

2.1 Personnel of the Company and GC Group shall refrain from accepting a gift, a souvenir or any other form of benefits in all circumstances and inform outsiders of No Gift Policy.

2.2 In events where a gift, a souvenir or any other form of benefits cannot be avoided or returned, personnel involved must submit a report on the acceptance of a gift, an asset or any other form of benefits along with the received item to supervisor based on the line of command for review and further proper actions<sup>2</sup>. If the supervisor deems the acceptance is not appropriate, he or she shall prepare the delivery of received item for donations to an outsider, an external organization, or the Corporate Governance Department for charity or public-benefit purposes. However, employees may keep received calendar or diary that are PR items of a company for personal use.

## **3. Receptions**

Incurring expenses for business receptions such as providing foods and beverages, sport activities, and others that are directly related to business practices or business norms, including expenses related to giving information for knowledge or understanding of businesses, is allowed if done for the Company's business interests based on clear budget

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<sup>2</sup> Supervisors shall exercise judgement in determining if employees can receive a gift, souvenir or any other form of benefits for his / herself based on the followings:

1. Accepting the gift must not be a part of benefit exchanges. In other words, employees must not have to repay gift givers in any way.
2. Accepting the gift must not influence work decisions or the work of gift recipients both in the present and in the future.

table and approval table included in the Manual of Delegated Authorities (MODA). Payments of such expenses must neither affect work decision nor cause conflict of interest, though.

**4. Organizing CSR Activities through Collaboration with State Organizations / Government Officials**

4.1 Organizing CSR activities through collaboration with a state organization / government official can be done in the name of the Company when those activities' objectives resonate with the Company's CSR policy. Also, such CSR activities must have clear criteria and evaluations, and proceed in line with the process and regulations prescribed by the Company and GC Group.

4.2 CSR activities or activities conducted in the name of the Company and GC Group must not be related to activities supporting a political party.

**5. Accepting Proposed Meetings, Training, Seminars, and Business Visits at the Expenses of Suppliers**

5.1 The acceptance of proposed meetings, training, seminars, and business visits is possible in events that such activities are mentioned in contracts and have no hidden tourism motive.

5.2 In events proposed meetings, training, seminars, and business visits are not mentioned in contracts, they can still be accepted if the acceptance is in the interests of the Company and GC Group, receives approval from a supervisor, and complies with the Company's and GC Group's regulations.

5.3 Proposed training and seminars that have hidden tourism motive and lacked genuine knowledge-transfer intention must not be accepted.

**6. Allowances for Government Officials' Travel Expenses and Other Expenses**

6.1 Allowances for government officials' travel expenses and other expenses shall be provided based on applicable laws and announcements.

**7. Donations and Sponsorships for State Organizations, Government Officials, and Charity Organizations**

7.1 Donations to and sponsorships for an organization can be done under the following conditions:

7.1.1 The receiving organization is reliable based on criteria mentioned in Donations and Sponsorships for Public-Relations Purposes Handbook of the Company and GC Group.

7.1.2 Donations and sponsorships must be made transparently in the name of the Company and / or GC Group and comply with both laws and the Company's or GC Group's regulations.

7.1.3 Money must not be directly paid to a government official or any individual except when their name is clearly specified in the letter asking for sponsorship and a proof of sponsorships is provided in writing.

7.1.4 Monitoring must be made to ensure that the donations and / or sponsorships have really been used for public benefits and / or purposes specified in the calls for donations and / or sponsorships.

### **Cautions**

1. Personnel of the Company and GC Group at all levels should study, understand, and embrace guidelines, and also strictly adhere to Corporate Governance and Business Code of Conduct Handbook, and anti-corruption policy.
  2. In events of violations or non-compliance with applicable policies, guidelines, and rules and regulations, personnel involved shall face disciplinary actions meted out reasonably based on the Company's work rules and regulations. Upon witnessing actions that are suggestive of corruption or involve legal offenses, personnel of the Company and GC Group at all levels have the duty to report the actions via Whistleblower Channel.
  3. If you have any question, please contact the Corporate Governance Department of PTT Global Chemical Public Company Limited via E-mail: [CorporateGovernance@pttgcgroup.com](mailto:CorporateGovernance@pttgcgroup.com), Corporate Governance Division via Tel. 02 140 8759 02 265 8645 or 02 265 8315, and Corporate Compliance Division via Tel. 02 265 8456 or 02 265 8474.
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## Examples

*What should you do in such scenarios?*

1. Can you keep a gift from a lucky draw at an event that had a big number of participants such as a seminar involving an external organization?

**Advice** If you attended the seminar on behalf of the Company and was offered a gift from an outsider be it a gift from a lucky draw or a gift specifically given to you. You have to decline receiving the gift and have the duty to inform outsiders of the Company's guideline on No Gift Policy. However, in events that you are unable to decline receiving the gift due to business reasons or due to difficulties involved, you must report the acceptance of the gift, asset or any other form of benefit and submit the item to your supervisor based on the line of command for review and further proper actions.

2. Can you receive a concert/sport-event ticket from a supplier/customer?

**Advice** Pursuant to the Company's guideline on No Gift Policy, you must not accept a concert ticket from a supplier / customer. Also, you have the duty to inform outsiders of the Company's guideline on No Gift Policy. In events that you are unable to decline the ticket gift because it has been mailed to you, you must send it back to the giver or report the acceptance of the gift and submit the ticket to your supervisor for review and further proper actions.

3. Can you host a reception or give benefits to a government official?

**Advice** Employees should refrain from hosting a reception or offering any benefit to a government official so as to avoid a risk of bribing a government official, which is a legal offence under the Office of the National Anti-Corruption Commission Act.<sup>3</sup> However, if there is a need to host a reception or offering a benefit in line with customs to complement corporate image, you may do so strictly based on an applicable guideline published in the National Anti-Corruption Commission's Announcement<sup>4</sup>.

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<sup>3</sup> Section 176 of the organic law on anti-corruption B.E. 2561 stipulates that a person who gives, asks for, or promises to give asset or any benefit for a government official with aim to persuade the official to take an action, refrain from an action, or delay an action in the abuse-of-authority nature shall face a jail term of up to five years and/or a maximum fine of 100,000 baht.

<sup>4</sup> The National Anti-Corruption Commission's Announcement on Government Officials' Legitimate Acceptance of Asset or Benefit Guideline B.E. 2543 stipulates that government officials may receive an asset or benefit having the value of no more than 3,000 baht per person per occasion from a person who is not their relative.

**4. Can you host a thank-you event for customers?**

**Advice** A thank-you event can be held in the following conditions:

- 1) The thank-you event is held for the Company's business purposes for example for stimulating sales or introducing the Company's products; and
- 2) The thank-you event has been planned in a clear-cut, transparent, and accountable manner. The plan should specify prices and objectives of the event; and
- 3) You shall seek a prior approval from a vice president or equivalent. Requests for the event's budget approval must be based on conditions set forth by the Manual of Delegated Authorities (MODA).

**5. What if you are not so sure of your decision?**

**Advice** Ask yourself the following questions:

- Is an intended action illegal?  
If yes, don't do it.
- Is an intended action against the Company's policy?  
If yes, don't do it.
- Is an intended action against the Company's corporate value and culture?  
If yes, don't do it.
- Will an intended action adversely affect the Company's stakeholders?  
If yes, don't do it.
- Will an intended action hurt the Company's image?  
If yes, don't do it.
- Will an intended action set bad standard for future practice?  
If yes, don't do it.

If you remain unsure as to whether your decision is correct, consult your supervisor or the Corporate Governance Department.

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