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## **Raimon Land PLC.**

### **Gifts, Hospitalities and Expenses Policy**

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**Policy Reference # FA006**

**Name of Document Owner: Finance and Accounting**

**Prepared by: Finance and Accounting**

**Date:** November 1, 2016

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#### **Revision Control**

<b>Revision no.</b>	<b>Date</b>	<b>Description of Change</b>	<b>Reviewed by</b>	<b>Approved by</b>
V1.0	November 1, 2016	Original Issue	Mr. Sataporn Amornvorapak (CFO)	Mr. Lee Chye Cheng Adrian (CEO)

## Gifts Hospitalitys and Expenses Policy

Item	Content
1. Purpose	The purpose of this policy is to provide the practical guidance regarding appropriate practices for the acceptance, solicitation or giving of gifts, hospitality, entertainment, political contributions, charitable contributions, donation, sponsorships, facilitating payments and other expenses which could influence the outcome of business transactions.
2. Definition	<p>2.1. Gifts: Something given voluntarily without payment in return, as to show favor toward someone, or honor an occasion. Gifts include cash or cash equivalent.</p> <p>2.2. Hospitality / Entertainment: Payments made to entertain business partners or clients. It can be inappropriate when the tickets and entertaining are of high value such as attending a major sporting event.</p> <p>2.3. Political Contributions: A contribution, financial or in-kind, to support a political cause. Financial contributions can include loans. In-kind contributions can include gifts of property or services, advertising or promotional activities endorsing a political party, the purchase of tickets to fundraising events and contributions to research organizations with close associations with a political party. It includes the release of employees without pay from the employer to undertake political campaigning or to stand for office.</p> <p>2.4. Charitable Contributions / Donation: Payments made without tangible return and may be used as a subterfuge or route for bribery.</p> <p>2.5. Sponsorships: Payments made for business objectives and usually for brand or reputation management purposes. It can be subject to kickbacks</p> <p>2.6. Facilitating Payments typically are unofficial, improper, small payments made to a low level public official to secure or expedite the performance of a routine or non-discretionary governmental administrative actions.</p>
3. Scope	<p>3.1. This policy applies to Raimon Land Public Company Limited together with its subsidiaries as referred to herein as “The Company”.</p> <p>3.2. This policy is attach to the Anti-Corruption Policy and applies to all directors, and employees working with “The Company”.</p>

Item	Content
4. Role and responsibility	<p>4.1. Department heads who take responsibility for any tasks as defined in this policy or as assigned in the relevant job descriptions will have full responsibility to comply with this policy and ensure that all employees in the departments follow this policy.</p> <p>4.2. The Company will communicate this policy to all employees regularly.</p>
5. General Rules	<p>5.1. The exchange of business courtesies is a common practice for various legitimate reasons to create goodwill, establish trust in relationships, or improve the image of The Company. Such courtesies are allowed. However, the value must be reasonable in consideration of the accepted business practices and is not intended to improperly influence the business decisions.</p> <p>5.2. All employees should not accept Gifts, Hospitalities, and Entertainments which the values are extravagant or out of line with business norms or tradition.</p> <p>5.3. All employees must not solicit vendors or business partners for money or “Anything of Value” in exchange for favorable treatment or abnormal business decision by the company.</p>
6. Gifts, Hospitality, and Expenses	<p>6.1. Gifts, Hospitality, Entertainments, and Expenses: The Company will prohibit the offer, giving or receipt of gifts, hospitality or expenses whenever they could influence or reasonably be perceived to influence the outcome of business transactions.</p> <p>6.2. Gifts, Hospitality, Entertainments, and Expenses giving to business partners must be approved from the authorized person as per Authorization Matrix prior to doing the transactions.</p> <p>6.3. Gifts that has a value equal to or greater than Baht 3,000 must be reported by the receiver in writing (via email) within three business days to the employee’s immediate supervisor.</p>
7. Political Contributions	<p>7.1. Political Contributions: The Company, employees, company’s agents, or other intermediaries should not make direct or indirect contributions to political parties, organizations, or individuals engaged in politics as a way of obtaining advantage in business transactions.</p>

Item	Content
	<p>7.2. All expenses must be reviewed by the authorized personnel to prevent payment to political parties, organizations, or individuals engaged in politics.</p>
<p>8. Charitable Contributions</p>	<p>8.1. Charitable Contributions are not used as a subterfuge for corruption. Charitable Contributions should be transparent, disclosed as per requirements, and in accordance with applicable laws.</p> <p>8.2. Charitable contributions must be reviewed and approved by the authorized personnel designated in the authorization matrix to ensure that improper charitable contributions are not made or are not used as a subterfuge for bribery.</p>
<p>9. Sponsorships</p>	<p>9.1. Sponsorships are not used as a subterfuge for corruption. Sponsorships should be transparent, disclosed as per requirements, and in accordance with applicable laws.</p> <p>9.2. Sponsorships must be reviewed and approved by the authorized personnel designated in the authorization matrix to ensure that improper sponsorships are not made or are not used as a subterfuge for bribery.</p> <p>9.3. Procedures to acquire, approve, or make payment of sponsorships must be in line with the normal purchasing procedures.</p>
<p>10. Facilitation Payments</p>	<p>10.1. The Company generally prohibits “Facilitating Payments” to be made in connection with its operations.</p> <p>10.2. Except in some circumstances, the company may be confronted with urgent situations, in which the making of a facilitating payment can hardly be avoided, such as when the health, security or safety of the employees are at risk, or the situation may affect the company severely. When a facilitating payment is made under such circumstances, it will be accurately accounted for in the company’s books and accounting records.</p>
<p>11. Reimbursement and Approval</p>	<p>11.1. Expenses according to this policy must be reimbursed and obtained approval from the authorized person as per the Authorization Matrix via the appropriate reimbursement form provided.</p> <p>11.2. Expenses must be supported by original and formal documents or by any evidence that prove the existence of such expenses.</p>



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12. Punishment	12.1. Violations of this policy are subject to disciplinary action as specified in the Company's Working Regulation. 12.2. The Company may appoint a committee to investigate the violations where appropriate.
	This policy is effective from November 1, 2016 onwards. Approved by CEO of Raimon Land Public Company Limited.

Reviewed By

**Chief Financial Officer**

Approved By

**Chief Executive Officer**