

Document	Gift Policy
Document No.	PROUD/LC/POLICY018
Effective Date	1 January 2021

Gift Policy

Proud Real Estate Public Company Limited and its subsidiaries (the “Company”) recognise the importance of conducting business in accordance with the principles of good corporate governance and transparent business ethics. The Company treats all stakeholder groups fairly to prevent discrimination and conflicts of interest. The Company has therefore established this Gift Policy covering gifts, assets, and other benefits to ensure strict compliance by all directors, executives, and employees. This Policy supports the establishment of high standards of governance and effective operations, promotes the Company's sustainable growth, and demonstrates its commitment to the Thai Private Sector Collective Action Against Corruption (CAC). The Company also promotes awareness of the importance of complying with this Policy and encourages participation in creating a fair and transparent working environment.

Purpose

The Gift Policy has been established to provide clear guidelines for giving and receiving gifts, assets, or other benefits in order to prevent conflicts of interest and discrimination. The Policy also supports the Company's commitment to conducting business in accordance with its Code of Business Conduct and the principles of good corporate governance. It promotes an organisational culture of social responsibility that is aligned with the anti-corruption guidelines of the Thai Private Sector Collective Action Against Corruption (CAC).

Definitions

1. **“Company”** means Proud Real Estate Public Company Limited and its subsidiaries.
2. **“Gift”** means any item given on various occasions in accordance with customs, traditions, or cultural practices, or as a matter of social courtesy.
3. **“Asset”** means any tangible or intangible property that may have value and can be owned.
4. **“Other Benefits”** means anything that may be assigned a monetary value, such as consumer goods, accommodation, travel, equipment and appliances, gift cards, personal items, vouchers, discount cards for goods or services, and cash. It also covers benefits that cannot be assigned a monetary value, such as services for which no market price can be determined, personal services, hospitality, preferential treatment, access to benefits, promises to provide benefits, or promises that a person will receive greater benefits than others.
5. **“Stakeholders”** means shareholders, customers, employees, business partners, creditors, contractors, retailers, competitors, society, and communities surrounding the Company's projects.

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Guidelines for Receiving Gifts, Assets, or Other Benefits

1. Policy Communication

To promote understanding and transparency, the Company shall communicate this Policy through its various communication channels, such as the Annual Report and the Company's website. The Company shall require its personnel to inform retailers, contractors, and business partners of this Policy so that all parties clearly understand and comply with the ethical standards established by the Company. Personnel shall also inform retailers, contractors, and business partners of the Company's policy of refraining from accepting gifts, items, or benefits in any form to promote a clear understanding of the Company's ethical standards.

2. Receipt of Gifts

Directors, executives, and employees shall refrain from accepting or requesting gifts or assets and from providing or accepting entertainment or hospitality involving other persons. An exception may be made where a gift bears the logo of the giver's company or organisation, such as calendars, notebooks, pens, or similar items, which the recipient may retain as a personal gift.

3. Management of Gifts That Cannot Be Declined

Where it is necessary to accept an item or other benefit from a person or organisation that supports the Company, such as an investor or financial institution, and the acceptance cannot be avoided, the following procedures shall apply:

(1) Consumable Gifts: Where a consumable gift will expire within one month, the supervisor of the department that received the gift shall be responsible for its management.

(2) Other Gifts: Where a gift or other benefit is received in the form of an item that does not bear the logo of the giver's company or organisation as described in Clause 2, the recipient shall hand it over to the Human Resources Department for registration and further action in accordance with the Company's procedures.

4. Participation in Seminars

Where employees are invited to attend seminars, training programmes, or study visits and consider participation beneficial to the Company, they shall submit a written request for approval to the Chief Officer of the relevant function or the executive responsible for that function. Consideration shall be given to whether the primary purpose of the event is to provide knowledge to participants rather than to provide any concealed benefit.

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5. Inappropriate Gifts

The following gifts or other benefits are considered inappropriate:

- (1) Gifts given as bribes or improper payments to obtain business or gain an unfair advantage
- (2) Entertainment or hospitality that may be regarded as excessive in a business environment

6. Gift Management

(1) Gift Register: The Company shall maintain a central gift register to record information on gifts received and ensure that the gifts are kept in good order and that the recorded quantity is complete and accurate.

(2) Gift Inventory Check: Every quarter, the person responsible for maintaining the gift register shall inspect the gifts held and compare them with the register, together with the person responsible for central gift storage, to confirm that the quantities match.

(3) Management of Lost or Used Gifts: Where a gift is lost or used, a written request for approval of the loss or use for the Company's operations shall be prepared and submitted to the supervising executive.

(4) Reporting on the Receipt and Disbursement of Gifts: Every year, the person responsible for maintaining the gift register shall report the receipt and disbursement of centrally managed gifts, together with information on any lost gifts, to the Chief Executive Officer.

(5) Disbursement of Gifts: Gifts, assets, or other benefits under the responsibility of the Human Resources Department may be disbursed only for Company activities. Prior written approval shall be obtained from an executive authorised to approve the disbursement of gifts.

Guidelines for Giving Gifts, Assets, or Other Benefits

1. Gift Giving

The giving of gifts, assets, or other benefits to customers, business partners, contractors, or stakeholders associated with the Company's business shall comply with applicable laws and accepted local customs. The value shall not exceed THB 3,000 per person per occasion and shall meet the following conditions:

- (1) The gift is given solely on behalf of the Company.
- (2) The gift does not expose the Company to risk.



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(3) The gift is given in accordance with customs, traditions, cultural practices, or accepted social practices.

(4) The gift bears the Company's logo or promotes the Company's image.

2. Approval for Giving Gifts

Gifts or other benefits provided to external parties shall receive prior approval from the Chief Officer of the relevant function and shall meet the following conditions:

- (1) The gift is provided for the benefit of the Company's activities and can be verified.
- (2) Prior written approval shall be obtained from an executive authorised to approve gift-related expenses.

Policy Review

The Company shall regularly review and improve the Gift Policy based on recommendations and feedback from various departments within the organisation.

Penalties

Any act that contravenes or violates the prohibitions specified in the guidelines under this Policy may constitute a disciplinary offence. The highest-ranking executive of the relevant function shall investigate the facts. Where a violation is confirmed, the matter shall be referred to the Human Resources Department for disciplinary action in accordance with the Company's regulations.

Issued on 1 January 2021

A handwritten signature in blue ink, appearing to read "Pumipat", is positioned above a horizontal line.

(Mr. Pumipat Sinacharoen)

Chief Executive Officer

Proud Real Estate Public Company Limited
