TRIMORO CO., LTD.

211/11-14 NONSI ROAD, CHONG NONSI, YANNAWA, BANGKOK 10120 THAILAND

TEL : (662) 295.30.78, 295.29.43,681.30.15 FAX : (662) 295.30.79Email : office@trimoro.com

Receiving and Offering Gifts, Hospitality, and Other Benefits Policy

Trimoro its business with adherence to good corporate governance principles while observing business ethics and transparency. The company treats all stakeholders equally. The company avoids any act that may lead to discrimination or may cause conflicts of interest. In this regard, a set of guidelines for receiving and offering gifts, hospitality, and other benefits (No Gift Policy) under Trimoro's Anti-Corruption Policy was developed as a standard of business conduct to ensure transparency, efficiency, sustainable growth, and dignity.

Principle

Trimoro Personnel must not accept or offer bribes and other benefits for Trimoro Personnel or outsiders, particularly government officials. Any Trimoro Personnel, who is found to have accepted or offered bribes or other benefits, will be subject to both disciplinary action under IRPC regulations and legal proceedings.

Guidelines

1. Offer of gifts, souvenirs, and other benefits

1.1 Offering gifts or souvenirs on some special occasions* is acceptable but must not contravene relevant laws and local customs. In Thailand, for example, a gift or souvenir with a monetary value not exceeding 10,000 baht per person per occasion is acceptable, according to the announcement of the National Anti-Corruption Commission. Moreover, gifts or souvenirs to be offered should come in the form that enhance Trimoro's corporate image, which include:

1.1.1 Calendars or diaries

1.1.2 Company products

1.1.3 Gifts that bear Trimoro corporate logo /corporate brand

Note:

(*) means festivals or special occasions where gifts are usually given. This may also mean occasions where people express
their congratulations, gratitude, or assistance as normal practice in the society.
(Ref: Regulations of the Office of the Prime Minister on Giving or Accepting Gifts by Government Officers B.E. 2544 (2001))

1.1.4 Products from projects under the royal initiatives, products from local communities nearby Trimoro's operating areas, or products intentionally made for charity or those that support sustainable development

1.2 Giving gifts and souvenirs should be based on a single standard to avoid discrimination.
1.3 It is prohibited to offer gifts, souvenirs, material goods, or other benefits to spouse, children, or those having acquaintance with government officials, customers, business partners, and those with whom we are having business. This will be considered receiving gifts via an intermediary.
1.4 Giving gifts on some special business occasions, such as inauguration day, contract signing, is acceptable. However, the gift to be offered must not have a monetary value exceeding 3,000 baht otherwise must receive a prior approval from the top management of the company or prior approval under the regulations of Trimoro.
1.5 As Trimoro is a member of Responsible Jewellery Council, Responsible Jewellery Council Code of Practices required to records all gifts which received or provided by Trimoro as our transparency to all stakeholders. The gifts, hospitality and other benefits are not considered as any bribes, corruptions.

2. **Hospitality**
   Expenses for providing business hospitality, such as receptions or sports events, other expenses directly relating to business operations or trading traditions as well as dissemination of knowledge about the business, are acceptable. Such expenses, however, must be paid in a reasonable manner with no influence on business decision and without causing conflicts of interest.
3. **Organization of CSR activities with government agencies or government officials**
   3.1 CSR activities with government agencies or government officials can be organized as considered appropriate. However, such activities must be held on behalf of the company and with an objective in line with the company's CSR policy. In this regard, some criteria, plans, and methods to assess the results of the activity should be established. Organization of CSR activities must also conform to regulations or procedures of Trimoro
   3.2 CSR or other activities on behalf of Trimoro must not be held in support of political parties.

4. **Acceptance of gifts, souvenirs, or other benefits**

   4.1 In any circumstances, Trimoro employees must never receive gifts, souvenirs, or other benefits. They are also required to inform outsiders about the company's No Gift Policy.

   4.2 In the event that refusal to accept gifts, souvenirs, or other benefits is not appropriate while such gifts, souvenirs, or other benefits cannot be returned to the giver, Trimoro is required to establish a department in charge of this matter. The department is responsible for collecting all the goods received and donate them to persons or organizations outside Trimoro for charity or for the common good, or proceeding under the regulations of Trimoro. Exceptions are made for the following:

      4.2.1 Consumables with an expiry date of less than one month should be at the discretion of direct executive overseeing department receiving the goods.

      4.2.2 Trimoro Personnel are allowed to receive calendars or diaries made as a company's corporate gift for personal use.

      4.2.3 Receiving a gift or a souvenir on behalf of the company, such as at a contract signing event, is allowed, but the gift or souvenir will be declared company properties.

5. **Acceptance of invitation to a meeting, training, a seminar, or a visit to a business operation at the expense of a business partner**

   5.1 Acceptance of an invitation to a meeting, training, a seminar, or a visit to a business operation at the expense of a business partner is allowed if such meeting, training, seminar, or visit is part of an agreement earlier made. However, there must be no hidden agenda for leisure travel.

   5.2 Invitation to a meeting, training, a seminar, and a visit to a business operation at the expense of a business partner which is not part of an agreement can also be accepted provided that the acceptance is considered appropriate and beneficial to the business in Trimoro. The acceptance, however, is subject to prior management approval under the regulations of Trimoro.

   5.3 Invitation to training or a seminar with travel leisure as hidden agenda and with no deliberate intention for knowledge exchange must never be accepted.

6. **Offer of support for travel expenses or other expenses to government officials**

   6.1 Support for travel expenses or other expenses to government officials can be offered as considered appropriate. However, such support must conform to the regulations of Trimoro.

TRIMORO CO., LTD.

211/11-14 NONSI ROAD, CHONG NONSI, YANNAWA, BANGKOK 10120 THAILAND

TEL : (662) 295.30.78, 295.29.43,681.30.15 FAX : (662) 295.30.79Email : office@trimoro.com

7. Donation and contribution to government agencies, government officials, and charities

7.1 Donation and contribution to any organization must be made under the following conditions:

7.1.1 The receiving organization must be well-recognized or legally licensed.

7.1.2 The donation or contribution must be made transparently and legitimately
on behalf of Trimoro and under the regulations of Trimoro.

7.1.3 The payment must not be made directly to any government official or any person, except the person is clearly specified in the official request for such donationorcontribution. A written acknowledgement must be issued following the donation or contribution.

7.1.4 There must be a follow- up process to ensure that donation or contribution
is used for common interest and truly meets the objective.

Trimoro employees are required to study these guidelines for the correct understanding and compliance. If you have any doubt, you should consult Company Secretary or the responsible department/person.

TRIMORO COMPANY LIMITED
บริษัท ทรีโมโร จำกัด

Vincent Livet