



GIVING OR RECEIVING GIFTS REGULATIONS

Metro Systems Corporation Public Company Limited



PRINCIPLE

Metro Systems Corporation Public Company Limited and its subsidiaries place great importance on anti-corruption, while actively supporting and promoting anti-corruption awareness among personnel at all levels against all forms of corruption. Consequently, the Company has established regulations regarding the giving or receiving of gifts, sponsorships, or charitable donations. These serve to govern operations in compliance with laws, rules, and regulations, aligning with the principles of Good Corporate Governance and the Company's Business Code of Conduct. To reaffirm this commitment, the Company has defined operational regulations for personnel at all levels to adhere to as a common standard in accordance with the following guidelines

DEFINITIONS

Customary Tradition¹ means festivals or important days during which gifts are traditionally given. This also includes occasions for offering congratulations, expressing gratitude, hospitality, extending condolences, or providing assistance in accordance with socially accepted etiquette.

Giving of Gifts, Souvenirs, or Sponsorships

The giving of gifts or souvenirs is permissible only if it does not violate relevant laws, or is done solely in accordance with customary traditions and/or commercial practices. Such giving must not imply any obligation, bribery, or exert influence on mutual business decisions. Furthermore, the Company does not have a policy to provide sponsorships. Gifts or souvenirs must not be in the form of cash or cash equivalents, such as gift cards or gift vouchers, and must comply with the Company's approval authority levels.

In the case of giving to government agencies or public officials, the value must not exceed 3,000 Baht and must remain under the aforementioned conditions. The requester of such giving must proceed with the following steps

1. Clearly specify the name of the requester and/or the requesting department, as well as the name of the recipient.
2. Clearly state the purpose of the giving.
3. The requester must provide supporting evidence for approval, such as a letter or a project proposal signed by an authorized signatory of the receiving party.
4. Disbursements must follow the operational steps specified in the Company's Work Instruction.

¹ Regulations of the Office of the Prime Minister on the Giving or Receiving of Gifts by Public Officials, B.E. 2565 (2022)

Receiving and Managing Gifts

1. The acceptance of gifts with a value not exceeding 5,000 Baht must not have an underlying purpose implying any obligation or bribery, whereby the gift giver or supplier is entitled to preferential treatment for business outcomes, better pricing, or modified/improved sales conditions that benefit the supplier; such acceptance shall be deemed a personal gift.
2. The acceptance of gifts with a value exceeding 5,000 Baht
 1. The recipient must not accept gifts in the form of cash or cash equivalents, such as gift cards or gift vouchers.
 2. The recipient must request proof of giving from the respective company, which includes a gift delivery notification letter stating the purpose, along with the signature of an authorized signatory and the company stamp of the gift giver.
 3. The department receiving the gift must fill out the designated form and submit the documentation along with photographs to the General Procurement Manager. The General Procurement Manager must maintain a control register for gifts received and requisitioned, and submit the Company's gift receipt/requisition report to the Accounting Department.
 4. The General Procurement Manager is responsible for allocating the received gifts based on requests from departments wishing to requisition them, subject to approval in accordance with the Company's approval authority levels.

Business Entertainment and Hospitality

1. Directors, executives, or employees are permitted to accept business entertainment and hospitality in accordance with commercial customs and for the business benefit of the Company.
2. Directors, executives, or employees are permitted to provide business entertainment and hospitality in accordance with commercial customs and for business benefits. In this regard, any entertainment provided by directors, executives, or employees must comply with the Work Instruction prescribed by the Company.

Charitable Donations

1. Charitable donations must be made in the name of the Company to reputable non-profit organizations. The purpose of the donation must be clear, lawful, and aimed at social benefit. Furthermore, the process must be conducted transparently through the prescribed procedures of the Company, ensuring that the donation can be tracked and audited to guarantee that it is not used as a pretext for bribery.
2. The requesting department must complete the form prescribed by the Company, attach all supporting documents, and submit them to the Accounting Department to maintain a charitable donation control register. Such donations must remain subject to the conditions and prohibitions concerning charitable donations or sponsorships under the Company's Anti-Corruption Policy, and must comply with the donation approval review conditions as follows
 1. Donations with a value not exceeding 10,000 Baht shall be reviewed and approved by the Group Managing Director.
 2. Donations with a value exceeding 10,000 Baht shall be reviewed and approved by the Chief Executive Officer (CEO).
 3. The requester must obtain supporting evidence, such as a letter or a project proposal signed by an authorized signatory of the recipient party.
 4. Disbursements must follow the operational steps specified in the Work Instruction prescribed by the Company.

Organizing Corporate Social Responsibility Activities or Projects

Contributions or donations to support sustainability operations or Corporate Social Responsibility (CSR) and environmental activities of the Company may be executed as appropriate, provided that they are made in the name of the Company and hold purposes aligned with the Company's Corporate Social Responsibility. In this regard, such projects must be reviewed and approved by the Corporate Governance Sub-committee, requiring a structured work plan and execution through the operational steps specified in the Work Instruction prescribed by the Company.

