

No Gift Policy

BlueVenture Group Public Company Limited ("Company") expresses its intention to implement a No Gift Policy. Therefore, it has established ethical standards for work conduct and governance within the organization to reinforce the values of expressing joy and good wishes through gift, assets, or any other benefits giving and receiving. It aims to create excellent standards for transparent, efficient operations that build trust and confidence from all stakeholders in accordance with the defined policy. The Company is committed to conducting business with transparency and integrity, in line with the policy and practices against corruption and bribery in all forms, for sustainable growth.

Objectives

1. To define practices for management and employees to understand the scope, various criteria related to no gift policy, including hosting, donations, and proper methods for expensing gifts, hospitality, and various donations.
2. To build good ethics, promote honesty and integrity according to good governance principles, and avoid conflicts of interest, and to ensure that the money used for gifts, or such expenses is not used as an excuse for corrupt and dishonest practices, which is a principle in the Company's business operations.

Scope

The no gift policy covers the giving or receiving of gifts and hospitality to or from business partners, contractors, or various businesses related to the Company, such as customers, consultants, government officials, individuals, or any other business entities dealing with the Company.

Definitions

“Gift Giving or Receiving, Hospitality Expenses”

refers to various expenses that have financial value, paid for any goods, including things used as cash equivalents and things that can be exchanged for goods or services.

“Charitable Contributions”

refers to the donation of money, goods, or any other benefits to the state, customers, partners, legal entities, or any individuals with the intent to obtain special rights or inappropriate benefits, unless carried out for the public interest of the community without expecting a return or benefit from the supported organization, such as donating money to associations, foundations, public organizations, temples, hospitals, educational institutions, or organizations that benefit society, etc.

For activities related to the value of gifts, hospitality, giving or receiving gift vouchers, and other expenses related to normal operations, they should follow traditional customs and practices. This is done with the intent to benefit the business or the Company's reputation, contribute to the creation of commercial goodwill, foster business relationships, promote efficiency in the work of partners that benefits the Company, and should be suitable for opportunities such as hospitality, sales promotion, organizing training and study visits, paying membership fees for various clubs, etc. These actions must be in accordance with the authority and procedures for receiving and paying money concerning gift payments, reception services, and other expenses for employees to ensure good practice in preventing corruption. For more details, see the authority, and the procedures for receiving and paying money. All this must definitely not involve hospitality in the form of entertainment establishments.

“Gift”

refers to anything of value that the Company gives or receives from business partners or external individuals to build friendships or relationships, in an appropriate value and in accordance to local customs, traditions, and relevant laws, i.e. calendars, diaries, company-branded goods, goods used for advertising, etc.

Operational Guidelines

The Company has set procedures and controls, including reporting, to ensure that the payment of gift expenses, hospitality, giving or receiving gift vouchers, and other expenses are in accordance with the policies set by the Company. Approval limits are set by levels, and expenses within a higher limit must be approved by those who have the authority as assigned by the Company's Board of Directors. In addition, the Company has arranged for the control of disbursements, with adequate examination of the documents for approval, proper evidence for payment, and every transaction can be recorded in the accounts. Documents should specify the related parties, clear business purposes, detailed explanations of activities, the amount paid, and the person approving the payment in accordance with the authority. This ensures that money for gifts or other expenses is not used as an excuse for corruption, and that approval and disbursement procedures align with the authority and work practices to comply with good internal controls.

When the Company intends to give gifts, provide hospitality, or offer any other benefits to any individual or external organization, the following procedures must be followed:

- (1) Ensure that the disbursement is in line with anti-corruption policies.
- (2) Consider the appropriateness in terms of the amount and sum of money.
- (3) Submit for approval in accordance with the authority.
- (4) The finance and accounting department should check the supporting documents for payment.

If it is a gift, it should be appropriate for the tradition or festival. For hospitality expenses and other expenses, specify the recipient's name, the name of the Company receiving the hospitality and the purpose of the payment.

- (5) The finance department should prepare a payment voucher, process the payment, and track the evidence of payment. Receipts should correctly list the Company's name for gift or hospitality expenses.
- (6) The accounting department should store all evidence of payment and it should be retrievable for verification.

When the Company intends to receive gifts, hospitality, or any other benefits from any individual or external organization, the following procedures must be followed:

- (1) Board members, executives, and employees should avoid accepting gifts or any favors from customers, partners, or business associates, except during festive seasons or as per business etiquette, and it should not influence business decisions.
- (2) Board members, executives, and employees can accept gifts with a value not exceeding 3,000 Baht (three thousand baht).
- (3) If the product's value exceeds 3,000 Baht (three thousand baht), report it using the gift receipt form and forward the gift to the office management department, either to be awarded to employees or donated for charity as appropriate.

Hospitality

Expenses for business hospitality or services, such as meals, beverages, and other directly related expenses, can be incurred but must be appropriate as per the established policy. They should not negatively impact or create a conflict of interest for the Company. In cases where it is necessary to host or entertain representatives for business hospitality, refrain from accepting or providing the hospitality based on the following circumstances:

- (1) Accepting or providing hospitality must comply with the Company's practices without conflicting with Company regulations, orders, policies, or any laws to create an influence in making business decisions.
- (2) Accepting or providing hospitality must involve a company representative holding a position not lower than that of an assistant director. Avoid implying that the hospitality takes place in exchange for business purposes, but instead, it should be organized to enhance opportunities to promote various company products or to create opportunities for better knowing customers.
- (3) Providing hospitality must not involve or fall under bribery, corruption, gambling, or support political activities. It must not cause damage to the organization's image, and absolutely must not provide hospitality in the form of entertainment establishments.
- (4) Providing hospitality must be a reasonable expense and must present a request for approval according to the authority.

Charitable Contributions

Since such activities are an expenditure without tangible return, and may be used as an excuse for corruption, the Company has established a policy regarding charitable contributions to prevent donations with hidden corruption objectives. Therefore, such donations must be for the common benefit or must not be suspicious as being part of corruption and must be made only in the name of the Company. Charitable contributions must be given to foundations, public charity organizations, temples, hospitals, healthcare facilities, or organizations that benefit society, which have verifiable certificates. The Company specifies that senior executives must approve transactions, and there must be reliable supporting documents for payments that can be traced back to their purpose.

When the Company wishes to donate money or assets for charitable purposes, the following procedures must be followed:

- (1) Consider whether the payment is in accordance with measures to implement the anti-corruption policy.
- (2) Check the identity of the recipient of the donation, which should be identifiable and have a clear purpose for accepting donations.
- (3) Submit a request for approval according to the authority.
- (4) The finance and accounting department must check the documents accompanying the payment and documents for the transfer of donated assets.
- (5) The finance department must prepare a payment voucher, carry out the payment, and follow up with the correct evidence of receiving money. In the case of donating assets, there must be approval and correct asset write-off, follow-up on evidence of asset receipt, and the accounting department must keep all documents of payment, which can be traced and verified.

Collaborating with Government Agencies or Officials on CSR Activities

Collaborating with government agencies or officials on CSR activities can be carried out as appropriate, and must be done in the name of the Company, and with objectives aligned with the Company's CSR policy. There should be clear criteria, planning, and measurable results, and the process should be carried out according to the Company's regulations. Any CSR or other company activities must exclude involvement with political support.

Penalties

Board members, executives, and employees must understand and comply with the no gift policy, including donations. Anyone who violates this policy is deemed to have committed a breach of the Company's employment regulations and will be considered for disciplinary action as specified by the Company. This may also include legal penalties if the action is in violation of the law.