



noble

Guideline for Offering or
Accepting Gifts, Hospitality,
or Other Similar Forms of Rewards

Guideline for Offering or Accepting of Gifts, Hospitality, or Other Similar Forms of Rewards

This guideline is part of the Anti-Corruption Policy

Noble Development Public Company Limited (the Company) is aware that establishing a good relationship with stakeholders is essential for the Company's continued success. However, offering and accepting of gifts, hospitality, or other similar forms of rewards can generate corruption risks or may bring uncomfortable feeling and may affect decision-making in performance of duties. The Company defines Guideline for Offering or Accepting of gifts, Hospitality or Other Similar Forms of Rewards in accordance with the Company's Anti-Corruption Policy for directors, executives and employees at all levels to strictly adhere.

Objective and Guideline for Offering Gifts, Hospitality, or Other Similar Forms of Rewards

The Company defines Guideline for Offering or Accepting of Gifts, Hospitality or Other Similar Forms of Rewards for directors, executives and all employees to understand the policy of offering and accepting of gifts, hospitality, or other similar forms of rewards and be able to understand scope, criteria and appropriate operational approach.

Guideline for the Offering of Gifts, Souvenirs, or Other Similar Forms of Rewards

Directors, executives, and employees can offer gifts, souvenirs or other similar forms of rewards to stakeholders but shall meet all of the following conditions:

1. Shall be giving gifts, souvenirs or other similar forms of rewards that comply with conventional occasion* and must not violate relevant laws such as in Thailand, the value should not exceed 3,000 baht per person per occasion based on the notification of the National Anti-Corruption Commission.
2. Shall not be giving gifts or souvenirs in form of cash or cash equivalent such as gift vouchers or gift cards.
3. Shall be giving gifts or souvenirs in a form that promote corporate's image as follows:
 - 3.1 Products that bare corporate logo or corporate brand.
 - 3.2 Products from Royal Project, Royal Initiative Project, products from community or charity or public benefit or products that support sustainable development.
4. Shall be giving on behalf of the Company only, not on behalf of directors, executives or employees and shall act openly, not concealing.
5. Shall have types and values in which suitable and appropriate such as if it is during bidding, shall refrain from giving gifts to government officials, directors, managers, and all employees of related agencies.
6. Shall not be any acts to dominate, lead or reward any person to gain an advantage through improper or hidden action in order to obtain assistance or benefit.

*Conventional occasion means festivals or special occasions where gifts are usually given. This may also mean occasions where people express their congratulations, gratitude, condolences 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))

7. Shall not be giving gifts, souvenirs, assets or any other similar forms of rewards to spouses, children or related parties of government officials, customers, business partners and contact persons in which circumstances considered as being a substitute.
8. Giving souvenirs on important business occasions such as the inauguration day or contract signing is doable. However, if the value is more than 3,000 baht, must obtain prior approval according to the Company's regulations.
9. Shall provide the Offering and Accepting of Gifts, Hospitality, or Other Similar Forms of Rewards Form (attachment 1) to obtain an approval in accordance with the Company's regulation, subject: Authority to approve Offering and Accepting of Gifts, Hospitality, or Other Similar Forms of Rewards (attachment 2).

Guideline for Hospitality or Business Receptions

Directors, executives and employees can offer hospitality or business receptions to stakeholders but shall meet all of the following conditions:

1. Shall be spending for hospitality or Business Receptions in form of meal and beverage, entertainment in form of sports and other expenditures in which directly related to business operation or commercial traditions, including providing business insight and spending as reasonable and not affect decision-making in performing duty or causing a conflict of interest.
2. Shall be offering hospitality or business receptions on behalf of the Company only, not on behalf of directors, executives or employees and shall act openly, not concealing.
3. Shall have types and values in which suitable and appropriate such as if it is during bidding, shall refrain from offering hospitality or welcoming party to government officials, directors, managers, and all employees of related agencies.
4. Shall not be hospitality or business receptions in an inappropriate setting.
5. Shall not be any acts to dominate, lead or reward any person to gain an advantage through improper or hidden action in order to obtain help or benefit.
6. Shall provide the Offering and Accepting of Gifts, Hospitality, or Other Similar Forms of Rewards Form (attachment 1) to obtain an approval in accordance with the Company's regulation, subject: Authority to approve Offering and Accepting of Gifts, Hospitality, or Other Similar Forms of Rewards (attachment 2).

Guideline for Accepting of Gifts, Souvenirs, or Other Similar Forms of Rewards

1. Determining to have No Gift Policy during various festivals such as New Year or any other occasions in order to create good norms in business operations. Directors, executives and all employees are responsible for informing to business partners and relevant stakeholders regards the Company's No Gift Policy continuously and requesting for cooperation from stakeholders.

2. Determining that directors, executives and employees shall refrain from accepting items or other benefits from all stakeholders related to the Company's business operations such as accepting gifts, solicitation, business receptions, donations, etc.
3. In a case it is necessary to accept items or other benefits is inevitably such as business partner is unaware of No Gift Policy and already delivered gifts, or directors, executives or employees are under an unrefusal situation so to keep business relationship with the person or the organization, therefore, directors, executives and employees shall perform the followings:
 - 3.1 Assigning a manager or higher position to accept gifts.
 - 3.2 Bringing gifts and prepared the Offering and Accepting of Gifts, Hospitality, or Other Similar Forms of Rewards Form (attachment 1) to Human Resource Group immediately.
 - 3.3 Human Resource Group shall record on accepting gifts and is responsible for keeping such gifts and carrying out the following actions as appropriate:
 - 3.3.1 Collecting and donating to charitable organizations or public benefit.
 - 3.3.2 In case of consumer products that expire within 1 month, shall manage and distribute to directors, executives and employees as appropriate.
4. Directors, executives and employees can accept souvenirs worth not more than 500 baht such as calendars, key chains, pens, notebooks, commemorative coins with the corporate logo, etc., by assigning a manager or higher position to be the representative in accepting and bring accepted gifts attaching with the Offering and Accepting of Gifts, Hospitality, or Other Similar Forms of Rewards Form (attachment 1) to Human Resource Group for consideration to distribute souvenirs to directors, executives and employees as appropriate.
5. In a case that the Company is offered prizes, souvenirs or gifts from contests, contracting with business partners or in the award for the Company's achievement, the Company can accept such gifts in an inter-organizational manner by assigning a manager or higher position to be the representative in accepting such gifts, which are considered the Company's assets.

Meeting, Training, Seminar, Observational Study or Site visit to a Business Operation

1. Directors, executives and all employees are prohibited from accepting any offers to attend meeting, training, seminar, observational study or site visit to a business operation at the expense of a business partner.
 - 1.1 In case of directors, executives and employees wish to attend such a meeting, training, seminar, observational study or site visit to a business operation, they shall comply with the criterial and guideline as follows:
 - 1.1.1. Shall be suitable activities and beneficial to the Company.

- 1.1.2. Shall not affect the Company's operations and business decisions.
 - 1.1.3. Shall not be an activity that has hidden characteristics of travel leisure and having no deliberate intention for exchanging knowledge.
 - 1.1.4. Shall be approved in accordance with the Company's regulation and shall be at the Company's expenses.
- 1.2 In a case that the Company receives an invitation to attend a particular meeting, training, seminar, observational study or site visit to a business operation, directors, executives and employees shall comply with the criterion and guideline as follows:
- 1.2.1 Shall be business to business invitation.
 - 1.2.2 Shall be suitable activities and beneficial to the Company.
 - 1.2.3 Shall not affect the Company's operations and business decisions.
 - 1.2.4 Shall not be an activity that has hidden characteristics of travel leisure and having no deliberate intention for exchanging knowledge.
 - 1.2.5 Shall submit invitation card of particular meeting, training, seminar, observational study or site visit to a business operation attaching with the Offering and Accepting of Gifts, Hospitality, or Other Similar Forms of Rewards Form (attachment 1) to the Human Resource Group to record as evidence.
 - 1.2.6 Shall be approved in accordance with the Company's regulation and the Company is responsible for other relevant expenses.

Directors, executives and all employees of the Company are to ensure the understanding and strictly compliance with Guideline for Offering and Accepting of Gifts, Hospitality, or Other Similar Forms of Rewards. If you have any questions, please contact or consult the Company Secretary, Noble Development Public Company Limited Tel. 02 251-9955 Ext. 1405, 1410 or E-mail: corporate.s@noblehome.com

Attachment 1

Offering and Accepting of Gifts, Hospitality, or Other Similar Forms of Rewards Form

Date

Dear

Mr. / Mrs. / Miss

Position.....Group..... Department.....

- For reporting For approval
- Offering of gifts, hospitality or other similar forms of rewards
- Accepting of gifts, hospitality or other similar forms of rewards

Details are as follows:

No.	Company / Organization's name	Objective	Amount (THB)	Date

Recorded by
(.....)

Approved by
(.....)

Approved by
(.....)

Approved by
(.....)

Received by Human Resources Group
(.....)

Attachment 2

The Company's Regulation

Subject: Authority to Approve Offering and Accepting of Gifts, Hospitality, or Other Similar Forms of Rewards

Monetary value (THB)	Power of Authorization				In the case of accepting gifts, deliver them to Human Resources Group at the position of AVP up.
	CBDO or CFO or CCSO (Direct Supervisor)	Chief Operating Officer	Co-Chief Executive Officer	The Board of Directors	
offering of gifts, hospitality or other similar forms of rewards					
1. 0 - 3,000 Baht	✓				
2. > 3,000 Baht ≤ 150,000 Baht		✓			
3. > 3,000 Baht ≤ 200,000 Baht			✓		
4. > 200,000 Baht				✓	
accepting gifts, souvenirs or other similar forms of rewards must be send to Human Resources Group					✓

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