



Worldlease Company Limited

Policy and Procedure

on

Giving and Acceptance of Gifts and Entertainment

Effective Date : 20 Sep.2021



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1. Introduction

1.1 Worldlease Company Limited (“the Company”) is committed to operating its business with honesty, integrity and transparency in accordance with the good corporate governance principles. It aims to ensure all the executives and staff of the Company have common understanding and perform work honestly in accordance with the Company’s Corporate Governance Policy and Code of Conduct.

1.2 This Policy aims to serve as a guideline for executives and staff of the Company. It shall also cover their immediate family members, comprising their spouse, parents, siblings, children and the respective spouses thereof.

2. Scope of the Policy

2.1 This Policy shall be applicable to the Company’s executives and staff at all levels (covering both permanent staff and those under term-based or temporary contracts), advisors, interns, secondees, employees transferred to work elsewhere temporarily, temporary staff, agents, sponsors or other related persons.


2.2 Compliance with this Policy shall be part of employment contractual conditions binding all employees.

3. Objectives

To promote integrity and good governance and avoid conflict of interest which is regarded as a priority in business operation of the Company, the Company has set out the rules on giving and accepting gifts and entertainment as below.

4. Definition

The Company	means	Worldlease Company Limited.
The Bank	means	CIMB Thai Bank Public Company Limited as parent company
Customer	means	User of the Company services, including a person who contacts the Company for use of the Company’s services.
Business associates	mean	Provider of goods and services to the Company.
Giving financial support	means	Giving of money or any benefits to support an activity for public relations or marketing purpose.
Donation	means	Giving of money or items in any other forms by the Company to organisations or individuals based on its corporate social responsibility (CSR) framework/guidelines, including giving of gifts to charitable or public organisations.

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Gifts mean Items given on various occasions, excluding calendars and/or diaries used for public relations purpose of the Company's customers or business associates.

Entertainment means Giving of special treats of foods, drinks or any other services whether they be entertainment shows, sports or recreation facilities, or entertaining services such as welcoming and assisting a person who comes to contact, or public relations activities for the purpose of business networking or fostering business relationships.

5. Acceptance of Gifts

5.1 Unless as stated in item 5.2 of this Policy, acceptance of gifts, including rewards or benefits, from customers or business associates of the Company is not allowed in all cases. If a customer or business associate offers a gift, reward or benefit, such offer shall be declined or the gift, reward or benefit shall be returned, with explanations provided on the reasons and the company's no-gift guidelines and practices.


5.2 Acceptance of gifts, including rewards or benefits, is not allowed in all cases unless in case of:

- a. Calendars or diaries used for public relations purpose of the Company's customers or business associates.
- b. Souvenirs given on important business occasions, e.g. agreement signing ceremonies, the Company visits or public events. In such cases, the souvenirs must become the Company's properties.

5.3 Each work unit must appoint an internal staff member to be in charge of proceeding in accordance with item 5.4 and item 5.5 if it is considered necessary to accept the items under item 5.2.

5.4 For the work units in the Head Office, including CIMB Thai Tower Building 16th FL, Langsuan Road and CP3 Tower, in case of the gifts received under item 5.2 which are unable to be declined or returned, and except calendars and/or diaries used for public relations purpose of the Company's customers or business associates, the staff in charge of the work unit in accordance with item 5.3 has to record such items in the Item Registry Form and deliver them to Corporate Affairs for further distribution for charitable or public benefits, or for sale or auction, from which all proceeds shall be donated for charitable or social benefits as deemed appropriate by Corporate Affairs, unless in case of consumables due to expire in less than a month, where action to be taken shall be at the discretion of Head of such work unit. The items so handled must not breach the law nor be in the nature of bribery or support for any political activity.

5.5 In case of any business center/branch/branch operation having received the gifts under item 5.2 which are unable to be denied or returned, and except calendars or diaries used for public relations purpose of the Company's customers or business associates, the staff in charge of the work unit in accordance with

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item 5.3 has to record such items in the Item Registry Form and Head/Manager of branch or assigned staff is to distribute them for charitable or public benefits. Upon such proceeding, the business center/branch/branch operation shall send a copy of the Item Registry Form and a thank you letter or donation evidence document to Corporate Affairs for evidence record (sending by e-mail allowed).

6. Giving of Gifts

6.1 Offering or giving of gifts, including rewards or benefits, to customers or business associates of the Company is not allowed.


6.2 Giving of gifts is allowed in the following cases:

- a. Gifts to the Company's customers or business associates as a customary practice, including occasions to extend congratulations, appreciation, welcome, condolences or assistances according to the social etiquette or giving of gifts to the customers or business associates for exchange of gifts on important business occasions, e.g. agreement signing ceremonies, business visits, or public events, etc. Gifts may be given during any one of New Year and Songkran festivals, and any one of Chinese New Year and Mid-Autumn (Moon) festivals, as deemed fit per customer.
- b. Gifts given as per item a. above must not breach the law, serve as bribery or support any political activity, and the value of which must not exceed THB 1,000 per person per occasion. If possible, the gifts should be promotional items with Company logo thereon.
- c. Giving of gifts on important business occasions as per item b. above, if in the value exceeding THB 1,000 per person per occasion, shall be subject to consideration and approval by Head of unit or Manager Director (including the person in the acting position thereof).

6.3 Giving of gifts as per item 6.2 above is applicable solely to the Company's customers or business associates. Gifts must not be given to spouse, children or any related person of the customers or business associates as it is considered the acceptance of the gifts on behalf thereof.

7. Entertainment

7.1 Expenses for treats of entertainment in a business nature for customers or business associates must be in the value not exceeding THB 3,000 per occasion and for the purpose of business networking and fostering relationships with the customers or business associates. In this case, the list of customers or business associates shall be provided, and the relevant call report shall be prepared and kept as evidence for reference.

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7.2 Expenses for treats of entertainment in the value exceeding THB 3,000 per occasion must be subject to consideration and approval by Head of unit or Manager Director (including the person in the acting position thereof).

7.3 Treats of entertainment are not allowed in the following cases:

- a. Where an actual or potential conflict of interest situation may arise, e.g. entertainment treats whilst a bidding is in progress or expectation of quid pro quo.
- b. Breach of any rules or laws.

8. Giving financial support

8.1 Giving or receiving any financial supports which could be used as means of avoiding a direct bribe offering for the Company's specific benefits is not allowed.

8.2 Providing financial support or contributions is allowed if all of the following conditions are met:

- a. It is financial support or contributions by the Company for programs, events or activities where the Company will be able to advertise or showcase its products and/or services either through publications or events/marketing activities.
- b. Financial support or contributions payment has been considered and approved by Head of the respective work unit or Manager Director (including the person in the acting position thereof).
- c. The grantee can prove that the financial support or contributions have been truly used for the program or activity as requested.
- d. The Company will be eligible for tax deductions. (Please check with Finance for list of organisations / corporates / agencies where tax deductibles are applicable.)

8.3 Any sponsorship payment not eligible for tax deduction shall be subject to prior approval by the Manger Director(including the person in the acting position thereof).


9. Donation

9.1 No donation is allowed.

9.2 Donation is allowed if all of the following conditions are met:

- a. It is money given to organisations or individuals based on the Company's CSR framework/ guidelines,including giving of gifts to charitable or public organisations;
- b. It has undergone consideration and approval by Head of unit or Manager Director(including the person in the acting position thereof).

9.3 All donation requests duly considered and approved as per item 9.2 b. shall be delivered and processed through Corporate Affairs.

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10. Sponsored Trips by Customers or Business Associates

10.1 Joining sponsored trips organised by the Company's customers or business associates is prohibited.


Explanations are to be provided to them on the reasons for not joining with reference to the Company's relevant guidelines and practices.

10.2 Trips invited by customers or business associates are allowed if all cost and expenses, e.g. airfare, accommodation cost, etc., are borne by the Company and a prior approval is given by the Manager Director(including the person in the acting position thereof).

11. Incentive Trips

11.1 Incentive trips are allowed if the organiser is the Company's business partner whereby eligibility is based on certain mutually agreed prerequisites with the Company.

Note This Policy is pursuant to the Personal Data Protection Act, B.E. 2562. It should thus be considered together with such Act and the Company's Personal Data Protection Policy.

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Registry Form

Under the Policy and Procedure on Giving and Acceptance of Gifts and Entertainment

Name of staff (recipient) _____ Staff ID no. _____
 Department _____ Date of receipt _____
 Name of giver and position _____
 Name of company / organisation _____
 Nature of relationship with the giver / company / organisation _____
 Description of the thing received _____
 Estimated value _____

Signature of the recipient	Signature of the supervisor for acknowledgment	Signature of Head of Corporate Affairs for acknowledgment
	Date	Date

For Corporate Affairs only

Corporate Affairs has received a thing as reported above and has treated it in the following way:

- Share with other employees
- Hold it in the department for donating to charitable organisation (state name of recipient)
- Auction (including sale to employees) (please state amount received and via which channel)
- Other (please state):

Please keep a copy and submit the original to Corporate Affairs

For the department for donating to charitable organization, please keep a copy for future reference and examination.