



## **Policy and Procedure**

**on**

## **Giving and Acceptance of Gifts and Entertainment**

Version: 3

Date: 25 June 2021

## 1. Introduction

- 1.1 CIMB Thai Bank Public Company Limited (“the Bank”) 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 Bank have common understanding and perform work honestly in accordance with the Bank’s Corporate Governance Policy and Code of Conduct.
- 1.2 This Policy aims to serve as a guideline for executives and staff of the Bank and the subsidiaries in its financial business group. 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 Bank’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.
- 2.3 The subsidiaries in the financial business group shall propose the Policy on Giving and Acceptance of Gifts and Entertainment to their respective Boards of Directors for adoption accordingly.

## 3. Objectives

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

## 4. Definition

The Bank	means	CIMB Thai Bank Public Company Limited.
Customer	means	User of the Bank’s services, including a person who contacts the Bank for use of the Bank’s services.
Business associates	mean	Provider of goods and services to the Bank.
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 Bank to organisations or individuals based on its corporate social responsibility (CSR) framework/guidelines, including giving of gifts to charitable or public organisations.
Gifts	mean	Items given on various occasions, excluding calendars and/or diaries used for public relations purpose of the Bank'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 Bank 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 Bank'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 Bank's customers or business associates.
  - b. Souvenirs given on important business occasions, e.g. agreement signing ceremonies, the Bank visits or public events. In such cases, the souvenirs must become the Bank'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 Thanon Langsuan Branch, 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 Bank'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 Communications 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 Communications, 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 branch, zone or business center 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 Bank'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 Head/Manager of branch/zone/business center is to distribute them for charitable or public benefits. Upon such proceeding, the branch/zone/business center shall send a copy of the Item Registry Form and a thank you letter or donation evidence document to Corporate Communications 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 Bank is not allowed.

6.2 Giving of gifts is allowed in the following cases:

- a. Gifts to the Bank'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 Bank 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 the respective work unit or the President and Chief Executive Officer (including the person in the acting position thereof).

6.3 Giving of gifts as per item 6.2 above is applicable solely to the Bank'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.

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 the respective work unit or the President and Chief Executive Officer (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 Bank'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 Bank for programs, events or activities where the Bank 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 the President and Chief Executive Officer (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 Bank 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 President and Chief Executive Officer (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 Bank's CSR framework/guidelines, including giving of gifts to charitable or public organisations;
- b. It has undergone consideration and approval by the President and Chief Executive Officer (including the person in the acting position thereof) or Head of the respective work unit.

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

#### **10. Sponsored Trips by Customers or Business Associates**

10.1 Joining sponsored trips organised by the Bank's customers or business associates is prohibited. Explanations are to be provided to them on the reasons for not joining with reference to the Bank'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 Bank and a prior approval is given by the President and Chief Executive Officer (including the person in the acting position thereof).

#### **11. Incentive Trips**

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

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 Bank's Personal Data Protection Policy.

**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 Communications for acknowledgment
	Date	Date

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**For Corporate Communications only**

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Corporate Communications 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 Communications**

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