



TCoC Newsletter

Providing or Receiving Gift and Hospitality Policy



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Each Tata employee is responsible for ensuring that his or her behavior and actions, both individual and collective, stay aligned with Tata's values and comply with all applicable laws and regulations of Thailand as well as Anti-Bribery and Anti-Corruption Policy, Providing or Receiving Gift and Hospitality Policy. This summary is for ease of understanding and implementation. The full policy is available on the Company's website at www.tatasteelthailand.com.

Policy of Providing Gifts and Hospitality :

It is not permitted to provide, promise or offer to pay, provide any gifts or any hospitalities to government officers, representatives, business partners, or any persons in the following cases1) Providing to the third person by the circumstances of being a recipient, for example, spouse, child, relative, or any related person with government officers or any persons.2) With intention or expectation to exchange business advantages or other transactions of the Company, or any other benefit of oneself, family, or any person, 3) To reward from gaining business advantages or other Company's transactions, 4) To gain support, convenience, or accelerate the process over normal procedures.

Regulations of Providing Gifts and Hospitality :

- 1) The value of gifts and/or hospitality must not be higher than **3,000 Baht** per person per occasion. If the value is higher than **3,000 Baht**, it must be considered and approved by the President and CEO.
- 2) Providing gifts or hospitalities should be operated under the same standard to be appropriate with level/position but must not be over than the value as stated in 1).
- 3) Providing gifts or hospitalities must not conflict with Laws, Traditions, Thai Culture, or Local Culture along with Conventionality, such as Christmas, New Year, Chinese New Year, Moon Festival, marriage, housewarming, ordination, visiting treatment in the hospitals, appointment, retirement, resignation, etc.
- 4) Providing gifts or hospitality on a business occasion, for example, signing a business contract, a new product launch, or the Company's establishment anniversary is permitted.
- 5) This practice does not apply to providing gifts of souvenirs to the speaker or instructor for training/seminar.
- 6) Categories of gift that are permitted should be in a form that promotes an image of the organization, for example, a calendar, and articles of office use like stationaries, desk accessories, or souvenirs with the logo of the donor's Company, product of Royal Project, product of communities nearby the plants to promote income of communities and locals, Charity products or any product for public benefit, product arranged in the basket during Christmas, New Year, Chinese New Year, or any festive occasions, including any other event/activity that often provides a basket, products of food, snacks, fruit, or edible items, including flowers, products of glassware, kitchenware, bedding and mattress, home decoration, clothing, sports equipment, office equipment, and electrical appliances. Any products other than items mentioned will be considered and approved by President and CEO.

Policy of No Gift and Hospitality Receiving:

All employees must not provide any gifts and hospitalities to the superiors, or their families and the superiors must not accept any gifts and hospitalities of any value from the subordinates. Furthermore, the Company requested for cooperation from all Business Partners to not offer gifts or hospitalities of any values for New Year, Festive, and any other Traditional occasions in order to build a strong standard of transparency and business sustainability development.

Regulations of No Gifts and Hospitality Receiving :

- 1) The Company assigns an Ethics Counselor to inform employees of the Company and its associated parties and assigns the Procurement Division to send the letter informing Policy of No Gift and Hospitality Receiving to business partners at least **one month** before the New Year.
- 2) If there are still cases where any person offers gifts and hospitality, the employee shall deny and communicate the Company's Policy of No Gift and Hospitality Receiving to the donor. In case it is given that the employee is not at the workplace or unable to contact them to deny the donor immediately, the employee shall call or send an email to inform the Company's policies mentioned above at the first possible opportunity and return such gifts or hospitality.
- 3) The gift value from each donor must not exceed **2,000 Baht** in case the supervisor receives it from a subordinate and must not exceed **3,000 Baht** in case of receiving from a business partner or any other persons, under the circumstances and conditions that would be acceptable as follows: Gift during New Year Festive, festivals, gifts on occasions of weddings or monkhood of employees or children, sickness of employees or family of employees or making a merit of a new home, gifts on the occasion of a transfer or a terminal event, gifts in recognition of a professional contribution made by employees such as participation in meetings, presentations, seminars, or workshops for professional institutes and educational institutes, etc., gifts received on an event of a ceremonial nature (e.g. in honor of a business transaction, etc.), gifts received on special occasions during overseas visits of the Company's officers.
- 4) In case that receives from subordinates acceptable only gifts on occasions of weddings or monkhood of employees or children, sickness of employees or family of employees or making a merit of a new home. gifts on the occasion of a transfer or a terminal event
- 5) All accepted gifts are to be reported to the recipient's Department Manager, HR Department, and Ethics Coordinator or Ethics Counselor. This should be done by disclosing in the Gift Register available at the HR Department stating the description of the gift that has been received, the estimated value of the gift and the circumstances under which the gift was received, and the particulars of the donor. Such declaration should be submitted within **5** days of receipt. Records of such gifts should be maintained in the gift register.
- 6) Any gifts other than those mentioned in above need to be returned back to the donor within **5** days of the receipt and with an appropriate note explaining to the gift donor the rationale for returning the gift.

