



**NO GIFT POLICY**

**Millennium Group Corporation (Asia) Public Company Limited**

Amendment No.: 1

Effective date: August 15, 2025

Approved by: The Board of Director's Meeting 4/2025

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## No Gifts Policy

This Policy is established to support the principles of Good Corporate Governance and Business Ethics, and is applicable to all executives and employees of Millennium Group Corporation (Asia) Public Company Limited and its subsidiaries (collectively referred to as the “Company”). It aims to prevent conflicts of interest and corruption, and to set forth clear guidelines regarding the giving and receiving of gifts, hospitality, or other benefits. The Company shall proactively raise awareness among employees, as well as with business partners and vendors, regarding this Policy to ensure its proper implementation in practice.

### Scope

This Policy aims to prevent allegations of bribery and conflicts of interest by prohibiting the acceptance of gifts, entertainment, or personal benefits from current or potential business partners or vendors. It applies to all directors, executives, and employees of the Company and its subsidiaries, covering gifts, entertainment, hospitality, and other benefits, including invitations extended to employees in a business context — whether in B2B (business-to-business) or B2G (business-to-government) transactions — involving private entities, business partners, vendors, or officials of government agencies related to the Group’s operations.

### **1. Receiving Gifts, Hospitality, Services, or Other Benefits**

- Employees at all levels, as well as their family members, friends, and/or close associates, are prohibited from soliciting or accepting gifts, hospitality, services, or any other benefits from vendors, partners, joint ventures, or stakeholders of the Company, under any circumstances, whether in their personal capacity or on behalf of any group, if such actions could result in bias in decision-making or lead to unfair treatment or create a conflict of interest.
- Gifts or benefits may be accepted on behalf of the Company when employees are assigned duties or authorized to act as representatives of the Company. Such acceptance must be in line with the framework set by the Company and may arise from promotional activities, incentives, or other events organized by vendors, partners, or third parties with the purpose of providing gifts to the Company or its representatives. Upon receipt, the gifts should be handed over to the Human Resources Department for further processing according to Company procedures.
- The acceptance of gifts must follow the criteria set by the Company, considering the type and value that aligns with general customs and accepted cultural practices. If the Company is in the process of bidding, employees are strictly prohibited from accepting any gifts, property, hospitality, or benefits from companies participating in the bidding process.
- In cases where a gift is received for reasons such as respect, to build business relationships, or as a sincere gesture, the following procedures should be followed:
  - Cash or checks should never be accepted under any circumstances
  - For souvenirs, tokens, or sweets with an approximate value not exceeding 3,000 THB, these may be accepted but should be reported to the Group Chief Executive Officer's Office and recorded in the Company’s gift register.
  - If the gift exceeds 3,000 THB in value or consists of a gift basket, it must be reported to the supervisor and handed over to the Group Chief Executive Officer's Office for recording in the gift register.

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- The list of gifts received and recorded in the register of the Group Chief Executive Officer's Office will be compiled and reported to management regularly for consideration and use in actions that benefit the collective interest or for public interest activities such as donations, employee rewards, or distribution to government agencies or other organizations. Such actions must be submitted for approval on a case-by-case basis.
  - If it is determined that an employee has engaged in corrupt practices or has sought personal or group benefits by abusing their position or responsibilities, it will be considered a serious disciplinary offense. The Company will take disciplinary action in accordance with its relevant regulations.
  - Employees at all levels, as well as their family members, friends, and/or close associates, are strictly prohibited from soliciting or accepting gifts, entertainment, services, or any other benefits from business partners, vendors, joint venture partners, or any stakeholders of the Company, whether personally or on behalf of others, in circumstances that may influence or bias their decision-making, lead to unfair treatment, or create potential conflicts of interest.
  - Gifts or benefits may only be received on behalf of the Company where an employee has been assigned, authorized, or appointed as a representative of the Company. Such gifts must be within the Company's prescribed framework and may arise from promotional, appreciation, or other activities legitimately organized by partners or external parties. Any received gifts must be submitted to the Human Resources Department for recording and handling in accordance with Company procedures.
  - The acceptance of gifts must comply with the Company's guidelines and be reasonable in value and nature, consistent with generally accepted customs and cultural practices. During tendering or bidding processes, employees are strictly prohibited from accepting any gifts, assets, hospitality, or other benefits from participating entities.
  - In cases where gifts are received for any reason (e.g., as a gesture of respect, goodwill, or genuine courtesy), the following rules shall apply:
    - Cash or cheques — strictly prohibited in all circumstances.
    - Souvenirs or tokens (such as general giveaways or snacks distributed to the public) — may be accepted but must be submitted to the Group CEO Office for entry into the Company's Gift Register.
      - From government agencies — value must not exceed THB 3,000 per occasion.
      - From private sector entities — value must not exceed THB 5,000 per occasion.
    - For gifts exceeding these thresholds or for gift baskets, the recipient must report to his/her supervisor and submit the gift to the Group CEO Office for registration and further handling.
  - All recorded gifts shall be consolidated by the Group CEO Office and reported periodically to management for consideration of appropriate disposition — such as for charitable donation, employee rewards, or public benefit activities — subject to case-by-case approval.

- If any employee is found or reasonably suspected to engage in corrupt behavior or to seek personal or group benefits by exploiting his/her authority or position, such conduct shall be deemed a serious disciplinary offense, and the Company shall impose disciplinary measures in accordance with relevant rules and regulations.

## **2. Giving Gifts, Hospitality, Services, or Other Benefits**

### **2.1 Criteria for Reimbursement and Approval**

- 1) All giving of gifts, entertainment, or services shall be conducted in the name of the Company by employees who have been assigned or duly authorized as the Company's representatives. Such activities must be necessary and appropriate under normal business customs, or form part of legitimate promotional or appreciation activities, or facilitate the Company's business operations.
- 2) The Secretary to the Group CEO shall compile a list of intended recipients from various departments and arrange appropriate corporate gifts or souvenirs for traditional occasions (e.g., New Year festivities).
- 3) The person receiving hospitality or services must not be a Company director or employee, unless specifically assigned to participate in such hospitality or event.
- 4) Reimbursable expenses for entertainment or services must relate directly to business activities that promote or support the Company's operations (e.g., travel, accommodation, meals, beverages, etc.).
- 5) The value of gifts, entertainment, or services per recipient shall not exceed:
  - Government sector: THB 3,000 per person per occasion.
  - Private sector: THB 5,000 per person per occasion.
- 6) Any amount exceeding these limits must receive prior approval from the Company's Executive Director or a person directly authorized by the Group CEO.
- 7) The Company strictly prohibits giving gifts, entertainment, or benefits if such actions could lead to corruption, discrimination, conflicts of interest, or the pursuit of personal or group advantage, which may harm fairness, business integrity, or the Company's reputation.

### **2.2 Procedures for Gift and Entertainment Reimbursement**

- 1) Employees requesting reimbursement must submit a Payment/Reimbursement Request Form, specifying the recipient's name or attaching a copy of the recipient's business card.
- 2) For promotional prize distribution, a photo of the delivery or receipt acknowledgment must be attached.
- 3) The employee who pays for gifts or services must obtain official receipts/tax invoices issued in the name of the Company, in compliance with the Revenue Code, without alteration, erasure, or correction marks. If corrections are necessary, a replacement document must be requested.
- 4) The Secretary to the Group CEO and the Finance & Accounting Department shall be responsible for verifying that all gift, entertainment, and service expenses strictly comply with this Policy and report findings to the Board of Directors.

- 5) Any employee found engaging in fraudulent, corrupt, or self-serving acts using his/her position shall be deemed to have committed a serious disciplinary offense, subject to disciplinary action under the Company's rules and regulations.

This No Gifts Policy was approved by the Board of Directors Meeting No. 4/2025 held on August 15, 2025, and is effective from August 15, 2025 onwards.

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(Mr. Pachara Yutidhammadamrong)  
Chairman of the Board of Directors