

Gift and Entertainment Policy

PACIFIC PIPE PUBLIC COMPANY LIMITED

The Board of Directors	
No. 1	12 November 2018
No. 2	22 December 2022
No. 3	20 December 2023
No. 4	20 December 2024
No. 5	16 December 2025

1. General Provisions

1.1 Objectives

- 1.1.1 To ensure that employees of Pacific Pipe Public Company Limited and its subsidiaries understand the policy on giving or receiving gifts and entertainment.
- 1.1.2 To enable employees to understand the scope, principles, and appropriate practices for claiming expenses related to gifts, entertainment, and participation in recreational activities, as well as other related practices.

1.2 Scope of the Policy

The Policy on Giving or Receiving Gifts and Entertainment covers the giving or receiving of gifts and entertainment with contractual counterparties or business partners related to the Company and its subsidiaries, such as customers, consultants, agents, government officials, individuals, or entities conducting business with Pacific Pipe Public Company Limited and its subsidiaries. For the purposes of this Policy, such persons or entities shall be referred to as "Customers" or "Business Partners."

1.3 Persons Required to Comply with This Policy

This Policy applies to employees and other persons involved in performing work for Pacific Pipe Public Company Limited and its subsidiaries, including external parties engaged under temporary or contractual arrangements. For the purposes of this Policy, such persons shall collectively be referred to as "Employees."

1.4 Policy Owner

The Division Director or a person assigned by the Company shall be responsible for monitoring and evaluating compliance with this Policy.

1.5 Policy Exemptions

Any exemption from compliance with this Policy must be approved by the Chief Executive Officer (CEO). The approval request must be submitted by the highest-level supervisor of the relevant division.

1.6 Relevant Rules or Laws

- Policies or procedures relating to the giving or receiving of gifts and entertainment
- Policy on sponsorships and donations for social activities
- Code of Ethics and Business Conduct
- Expense Reimbursement Procedure (QP-FA07) and Entertainment Expense Reimbursement Procedure (QP-FA09)
- Authorization Matrix for Gifts and Entertainment

1.7 Effective Date

This Policy shall become effective as of the date of approval by the Board of Directors of Pacific Pipe Public Company Limited.

1.8 Policy Review Frequency

This Policy shall be reviewed annually or when there are significant changes.

2. General Principles

- 2.1 Employees should avoid giving or receiving gifts and/or providing or accepting entertainment from customers or business partners.
- 2.2 In circumstances where such giving or receiving of gifts or entertainment cannot be avoided, employees must comply with the approval and reporting requirements in accordance with the rules and procedures prescribed under the Policy on Giving or Receiving Gifts and Entertainment.

3. Definitions

3.1 Gifts

“Gifts” shall mean any item or benefit of monetary value, including but not limited to cash equivalents; items exchangeable for goods or services (including airline tickets and discount coupons); transportation expenses; accommodation expenses; meal expenses; and the waiver of any rights or benefits to which Pacific Pipe Public Company Limited and its subsidiaries are entitled. This shall include the waiver of any rights or benefits that Pacific Pipe Public Company Limited and its subsidiaries are entitled to receive from customers or business partners, whether or not such rights or benefits have monetary value.

3.2 Entertainment

“Entertainment” shall mean the provision or acceptance of meals and beverages, performances, sporting events, participation in sports activities such as golfing, recreational activities, and other similar activities.

3.3 Government Officials

“Government Officials” shall mean political office holders; civil servants or local government employees holding permanent positions or receiving regular salaries; employees or persons performing duties in state enterprises or government agencies; local administrators and members of local councils who are not political office holders; and officials under laws governing local administration. This shall also include directors, subcommittee members, employees of government agencies, state enterprises, or government organizations, as well as any individual or group of individuals exercising governmental authority or entrusted with the exercise of administrative powers of the State under the law, regardless of whether such entities are established as government agencies, state enterprises, or other state-related entities.

4. Giving or Receiving Gifts

In giving or receiving gifts, employees shall exercise caution in the following matters:

4.1 Employees shall not give or receive gifts from customers or business partners in cases where:

- 4.1.1 such actions violate applicable laws, regulations, or the policies of Pacific Pipe Public Company Limited;
- 4.1.2 such actions do not conform to acceptable business practices or standards;
- 4.1.3 such actions constitute or may be deemed to constitute bribery;
- 4.1.4 such actions support or are related to political activities;
- 4.1.5 such actions occur within three (3) months prior to a government procurement or bidding process

4.2 Employees shall not give or receive gifts from customers or business partners in the form of cash or any items that can be readily converted into cash, except in the case of funerals, weddings, or ordination ceremonies.

4.3 Employees shall not demand, request, or solicit gifts, assistance, entertainment, compensation, or any services from customers or business partners beyond what is normally obtained through ordinary commercial transactions or as stipulated in contracts between Pacific Pipe Public Company Limited and its subsidiaries and such customers or business partners.

5. Entertainment

In providing or accepting entertainment, employees shall exercise caution in the following matters:

5.1 Employees shall not provide or accept entertainment from customers or business partners in cases where:

- 5.1.1 such entertainment violates applicable laws, regulations, and/or the policies of Pacific Pipe Public Company Limited and its subsidiaries, or constitutes or may be deemed to constitute bribery;

- 5.1.2 such entertainment is intended to improperly influence business decisions and is not in accordance with the customary business practices of Pacific Pipe Public Company Limited and its subsidiaries;
 - 5.1.3 such entertainment is extravagant or excessive beyond what is reasonably necessary;
 - 5.1.4 such entertainment may cause damage to the reputation of Pacific Pipe Public Company Limited and its subsidiaries;
 - 5.1.5 such entertainment is intended to support political activities;
 - 5.1.6 such entertainment, regardless of the circumstances or venue, involves obscenity, sexual services, or any sexual activities, including activities related to nudity or direct physical contact, where the purpose is to arouse sexual feelings or clearly provide sexual gratification;
 - 5.1.7 such entertainment takes place within three (3) months prior to a government procurement or bidding process, except for factory visits conducted for the purpose of building confidence in the Company's products.
- 5.2 A representative of the customer or business partner who provides or receives the entertainment must be present and participate in such entertainment.
- 5.3 Employees should avoid implying that such entertainment is provided in exchange for any business advantage. Entertainment should be arranged solely for the purpose of promoting the products of Pacific Pipe Public Company Limited and its subsidiaries or fostering better business relationships and mutual understanding with customers.
- 6. Exceptions**
- 6.1 Activities conducted for the purpose of introducing or promoting the products or services of Pacific Pipe Public Company Limited and its subsidiaries, or for enhancing the corporate image of Pacific Pipe Public Company Limited and its subsidiaries, which involve the provision of gifts or entertainment, shall be exempt from the approval and reporting requirements under the Policy on Giving or Receiving Gifts and Entertainment, provided that such activities involve a large number of customers or business partners or are conducted on a general basis, and have been approved by the Chief Operating Officer (COO) or the Chief Financial Officer (CFO).
- 6.2 Charitable donations shall be carried out in accordance with the Policy on Sponsorships and Donations for Social Activities.

.....(*signed*).....
(Mr.Kriengkrai Rukkulchon)
Chairman of the Board and
Chairman of the Nomination, Remuneration and Corporate Governance Committee