(Translation)

Announcement
No. LIT 019/2025

Gift, Hospitality and Entertainment Policy
(Revision No.1)

(Note: This document is an English translation of the original Thai version. In the event of any discrepancy or conflict between the English translation and the Thai original, the Thai version shall prevail in all respects.)

Endorsed by	LIT – Corporate Governance Committee, August 8, 2025
Approved by	LIT – Board of Directors, August 13, 2025
Effective Date	August 22, 2025
Next Review Date	Upon any changes

Revision History

Effective Date	Significant Changes
October 18, 2024	Gift, Hospitality and Entertainment Policy - Endorsed by the Corporate Governance Committee on September 16, 2024 - Approved by the Board of Directors on October 7, 2024
August 13, 2025	Procedure for Giving and Receiving Gifts, Souvenirs, and Token Gifts, and the Implementation of a Gift Declaration Log - Endorsed by the Corporate Governance Committee on August 8, 2025 - Approved by the Board of Directors on August 13, 2025

Gift, Hospitality and Entertainment Policy
(Revision No.1)

Lease IT Public Company Limited (the "Company") operates its business under the principles of Good Corporate Governance and Business Ethics, maintaining transparency and treating all groups of stakeholders with equity. The Company avoids any actions that may lead to discrimination or conflicts of interest. In alignment with its Anti-Corruption Policy, the Company has established this "Gift, Hospitality and Expenses Policy" to set a high standard for transparent and efficient operations, ensuring sustainable growth.

Principles

Directors, executives, and employees of the Company and its subsidiaries must remain committed to neither accepting nor offering bribes or any other improper benefits to company personnel or external parties, particularly government officials. Any proven violation of this policy shall be deemed offense under the Company's regulations and a violation under applicable laws.

1. Giving and Receiving Gifts

Gifts means anything of value provided by a person or a company to another person or company without any direct consideration. A gift may be in the form of physical objects or other types of benefits.

Practical Guidelines

The Company maintains a policy that prohibits directors, executives, and employees of the Company and its subsidiaries from soliciting, accepting, or offering gifts, items, or any other benefits that are excessive, exceed customary practices, or go beyond the conditions and regulations established by the Company. This is to ensure that the giving and receiving of gifts are conducted with transparency and are not intended for any personal gain or consideration that may constitute bribery or corruption. Consequently, the Company has established the following guidelines:

1. The offering and acceptance of gifts must be reasonable, open, and transparent. Such actions must be consistent with specific festivals or customary traditions.
2. The value of gifts or any other benefits given or received must not exceed 3,000 Baht.
3. In the event that it is necessary to provide items or any other benefits with a value exceeding 3,000 Baht, prior approval must be obtained from the Chief Financial Officer (CFO) and the Chief Executive Officer (CEO). Additionally, the "Form-CAC-07: Gift, Souvenir, and Token Gift Form" must be completed and retained within the department as evidence for inspection upon request by the Internal Audit Department.
4. In the event that it is necessary to accept items or any other benefits with a value exceeding 3,000 Baht, the relevant Chief Officer shall determine whether to grant approval for acceptance. Once received, the recipient must complete the "Form-CAC-05: Gift, Asset, or Other Benefits Acceptance Form" and submit it to the Chief Executive Officer (CEO) for further consideration and action.
5. The Company does not encourage business partners or business associates to provide gifts that could influence operational decisions with bias, cause discomfort, or lead to a conflict of interest. Exceptions are made for gifts given in accordance with customary practices, provided that such gifts are appropriate to the situation, festive occasion, and local traditions.

Examples of acceptable gifts that may be offered or received include:

- Business promotional souvenirs or general sales promotional items of insignificant value, such as pens, stationery, jackets, T-shirts, or tote bags bearing the Company's logo.
- Gifts or gift baskets provided during various festive occasions.
- Trophies, plaques, or awards of honor.

Examples of prohibited gifts include:

- Cash or cash equivalents, such as cheque, gift vouchers, gold jewelry, or real estate.

Procedures for Giving Gifts

1. The provision of gifts exceeding 3,000 Baht in value to customers, business partners, or business associates is strictly prohibited.
2. The provision of gifts must be reported and approved as follows:
   2.1 The requester shall prepare a memorandum (Memo) to seek approval from the Chief Executive Officer (CEO), which must be routed through Chief Financial Officer (CFO) and Line Chief Officer.
   2.2 The Line Chief Officer, the Chief Financial Officer (CFO), and the Chief Executive Officer (CEO) shall review the request to ensure that the purpose of giving the gift aligns with the Company's guidelines.
3. Upon receiving approval, the requester must complete the "Form-CAC-07: Gift, Souvenir, and Token Gift Form," ensure it is signed and acknowledged by the Line Executive on every occasion, and retain it within the department as evidence of gift-giving for inspection upon request by the Internal Audit Department.
4. The requester shall submit evidence of the gift, such as a receipt, to the Accounting and Finance Department as proof of the gift-giving.
5. The Accounting Department shall review the evidence of the gift-giving. If the provided evidence is insufficient, the requester will be notified to provide additional information or clarification. If it is proven that the gift-giving does not comply with the guidelines, or is used as a pretext or channel for corruption, the Company will impose the maximum disciplinary action against the offender.
6. The Internal Audit Department shall conduct an annual review of the gift-giving process to ensure that the procedures are efficient, effective, and maintained under appropriate internal controls.
7. This gift-giving policy does not include promotional items produced by the Company or the Group for general distribution to customers and business partners, such as mugs, bags, etc.

Procedures for Receiving Gifts

1. The acceptance of gifts must be reported or approved as follows:
   1.1 For values below 3,000 Baht, prior approval is not required; however, it must be reported and recorded in the "Form-CAC-04: Gift, Souvenir, and Token Gift Form." Additionally, it must be signed and acknowledged by the Line Executive, and retained within the department as evidence for inspection upon request by the Internal Audit Department.
   1.2 For values of 3,000 Baht and above, prior approval must be obtained from the Line Executive. Upon receiving the item, the recipient must complete the "Form-CAC-05: Gift, Asset, or Other Benefits Acceptance Form" and submit it to the Line Executive for review and comments, and subsequently forward it to the Chief Executive Officer (CEO) to determine the appropriate disposition of such item.
2. The Line Chief Officer and the Chief Executive Officer (CEO) shall review the gift details to ensure that the purpose of accepting the gift aligns with the Company's guidelines.
3. The recipient must submit the "Gift, Asset, or Other Benefits Acceptance Form" to the Internal Audit Department for record-keeping. If it is decided that the gifts are to be collected for New Year lucky draws, the Internal Audit Department shall be responsible for gathering and maintaining those items.
4. The Internal Audit Department shall report the management of gifts exceeding 3,000 Baht in value to the Chief Executive Officer (CEO) and the Corporate Governance Committee on a quarterly basis.
5. The Internal Audit Department shall conduct an annual review of the gift acceptance process to ensure that the procedures for receiving gifts and souvenirs are efficient, effective, and maintained under appropriate internal controls.

2. Business Entertainment and Hospitality

Business Entertainment means expenditures incurred for business hospitality, such as providing food and beverages, hosting sports activities, and other expenses directly related to business practices or trade customs, including business education and briefings. Such expenditures are permissible, provided they are reasonable and do not influence operational decisions or create a conflict of interest.

Practical Guidelines

1. Accepting offers for business entertainment, seminars, training, or site visits where expenses—such as meals, accommodation, and travel—are covered by business partners is prohibited, except with the review and approval of the Chief Executive Officer (CEO) or the authorized person at each respective level. Such offers must be appropriate, beneficial to the Company, reasonable in value, and in compliance with customary practices and relevant laws. Furthermore, the offer must be made on an organization-to-organization basis, rather than to an individual.
2. Business entertainment expenditures must comply with the following regulations:
   (a) For government agencies, government officials, and private sector entities: The amount must not exceed 3,000 Baht per occasion and must be approved by the Line Executive and the Chief Financial Officer (CFO).
   (b) In the event that the value exceeds 3,000 Baht per occasion: The request must be reviewed and approved by the Line Executive and the Chief Executive Officer (CEO), routed through the Chief Financial Officer (CFO). A clear reason and necessity must be specified, demonstrating that it is strictly for the business benefit of the Company.

Procedures

1. The requester shall prepare a memorandum (Memo) to seek approval from the Chief Executive Officer (CEO), which must be routed through Chief Financial Officer (CFO) and Line Chief Officer.
2. The Line Chief Officer, the Chief Financial Officer (CFO), and the Chief Executive Officer (CEO) shall review the entertainment details to ensure that the purpose of providing such hospitality aligns with the Company's guidelines.
3. The requester shall submit supporting evidence of the business entertainment, such as receipts, to the Accounting and Finance Department as proof of the provided hospitality.
4. The Accounting Department shall review the evidence of the business entertainment. If the provided evidence is insufficient, the requester will be notified to provide additional information or clarification. If it is proven that the entertainment does not comply with the Company's guidelines, or is used as a pretext or channel for corruption, the Company will impose the maximum disciplinary action against the offender.
5. The Internal Audit Department shall conduct an annual review of the business entertainment process to ensure that the procedures are efficient, effective, and maintained under appropriate internal controls.

The Gift, Hospitality and Entertainment Policy (Revision No.1) was approved by the Board of Directors of Lease IT Public Company Limited at Meeting No. 7/2025, held on August 13, 2025. This policy shall be effective from the date of announcement onwards.

Announced on August 22, 2025.
Police General Jate Mongkolhutthi
Chairman of the Board
Lease IT Public Company Limited