

Anti-Corruption and Anti-Bribery Measure Policy
Pruksa Holding Public Company Limited.

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1. Introduction

Pruksa Holding Public Company Limited. (the "**Company**") realizes that the Corruption has affected and is a hindrance of social and economic developments in Thailand. In addition, it is a misconduct which produces a business unfairness and effects to business ethics, competitiveness and it is unacceptable in the country and overseas as well as it leads the Company's stakeholders: shareholders, investors and all interested parties having no confidence to the Company. Therefore, this is considered as a considerable principle of the business operation not supporting any business, group of persons or those who has unlawfully participated in, directly or indirectly, exploitation from its power and duty.

2. Objective

This policy is a guideline for directors, executives and staff in all levels to be realized of their performance with a good sense of adhering to integrity without corruption or exploitation. It is essential to sustain the Company and its subsidiaries' reputation and encouragement in the business operation.

3. Definition

Company	means	Pruksa Holding Public Company Limited
Corruption	means	An abuse of power exploiting an unjust benefit, giving or receiving the Bribery, whether in any form, by wrongfully offering to give, promise, commitment, call for, give and receive money, property or any other benefits to a government officer, government agency, private organization or those who has a duty, whether directly or indirectly, in order to influence the said person to act or omit its performance or in order to acquire or reserve wrongfully business benefits.
Political Contributions	means	Contributions under the name of the Company, whether in form of financing or other form, for supporting political activities. Financing supports include giving a loan and in-kind support are giving things or services, advertising to promote and support a political party, purchasing entertaining tickets for funding or donating an organization with close relationship with a political party, etc. Unless the democratic support is permitted by law.
Bribery	means	Valuable property or other interest given to a person/group influencing such person or group to act or omit anything under its position, whether such act is a lawful duty or not, for personal benefits or benefits of the business of the Company, subsidiaries or associated companies.
Gift / Gratuity	means	Valuables in both material, goods and services, whether it is a direct giving or receiving, or offering to purchase or sell at special price as well as paying service fees such as traveling expense, etc.
Staff	means	A permanent staff, probationary staff, daily staff, staff who has been employed under a special condition by the Company with pay.

Business Agent	means	Another juristic person or natural person who is not a staff employed or agreed by the Company, its subsidiaries or associated companies to make a transaction or to contact a third party on behalf of the Company, its subsidiaries or associated companies.
Party	means	A person who makes a transaction with the Company, its subsidiaries or associated companies.
Charitable contributions	means	Activities relating to spending money without tangible benefit.
Public Donation	means	Giving to a group of people made by the Company, its subsidiaries or associated companies which may be without tangible benefit.
Grant-in-aid	means	Monies paid with objectives for supporting a business, brand or reputation of the Company, its subsidiaries or associated companies.

4. Roles, Duties and Responsibilities

In order to make the anti-corruption measure of the Company and its subsidiaries to be a clear guideline, roles, duties and responsibilities of concerned persons shall be specified as follows:

4.1 **Board of Directors** shall have the duty as follows:

4.1.1 Determine and approve this anti-corruption policy;

4.1.2 Approve and review practices for the anti-corruption measure;

4.1.3 Monitor the system to support the anti-corruption proficiently.

4.2 **Audit committee** shall have the duty as follows:

4.2.1 Review the Company, its subsidiaries or associated companies to have a sufficient internal audit;

4.2.2 Review the Company to be in compliance with the anti-corruption policy proficiently.

4.3 **CEO** shall have the duty as follows:

4.3.1 Promote, support and monitor to ensure that the staff and all concerned persons shall be in compliance with the anti-corruption policy and anti-corruption measure and relevant rules and practices as well as communicate them to the staff and all concerned persons;

4.3.2 Review the appropriateness of working systems and measures to be in conformity with the change of business, regulations and provisions of law.

4.4 **Executives in director position and above** shall have the duty as follows:

4.4.1 Control and monitor to take the anti-corruption measure to be actually practical, specify risks, inspect and manage the measure to be sufficient for solving problems appropriately, quickly and in time;

4.4.2 Support the development of process and personnel to achieve the anti-corruption measure of the organization.

4.5 **Staff** shall have the duty as follows:

4.5.1 Understand and comply with the anti-corruption measure and other measures (if any) and participate trainings as specified by the Company;

4.5.2 Immediately whistle blow upon it sees or is in doubt that there would be a Corruption, give a cooperation on inspecting facts regarding the doubt of Corruption;

4.5.3 The staff must not involve with the Corruption, whether directly or indirectly, and must comply with the measures or performance procedure of the Company strictly. Especially, the Staff involving with a work related to a main process which has a risk of the Corruption such as procurement, credit, selling, staffing, support work and investment.

4.6 **Internal Audit** shall have the duty as follows:

4.6.1 Audit and review the performance whether it is accurate and in compliance with the policies, measures, practices and relevant laws ensuring that there is appropriate and sufficient internal audit system to the Corruption risk which may arise and report the audit committee.

4.7 **Corporate Governance** shall have the duty as follows:

4.7.1 Give consultation and advice regarding the anti-corruption;

4.7.2 Monitor the performance of anti-corruption;

4.7.3 Coordinate with relevant organizations to distribute knowledge on the anti-corruption;

4.7.4 Report work performance and other performance in relation to the anti-corruption to the governance committee.

4.8 **Risk Management** shall have the duty as follows:

4.8.1 Develop a tool for assessing the risk of Corruption and provide an internal organization to assess the risk of Corruption;

4.8.2 Summarize the risk assessment to the committee on risk management in organizational level;

4.8.3 Collect measures and guidelines on the risk control of Corruption that it has considered and shall review the risk of Corruption every 3 years at least.

4.9 **Central Human Resource** shall have the duty as follows:

4.9.1 Manage the humane resource to be in conformity with the anti-corruption measure of the Company;

4.9.2 Prepare a process of recruitment, orientation, training and sanction of the anti-corruption;

4.9.3 Promote and create the culture in way of the anti-corruption guideline as well as avoid any act which may fall in the scope of Corruption.

4.10 **Accounting and Taxes** shall have the duty as follows:

4.10.1 Record and keep information and documents relating to the accounting and taxes;

4.10.2 Perform the procedure of financing and accounting practices to be in conformity with the generally accepted accounting standard;

4.10.3 Control the withdrawal of expenses according to the rule and regulation on withdrawal, approval manual for withdrawal of expenses, approval manual for operating expenses and in accordance with the anti-corruption measure.

4.11 **Communication and Brand Management** shall have the duty as follows:

4.11.1 Communicate and publish the anti-corruption policy and measure and relevant activities in order to produce a good sense of performing the work in integrity without Corruption;

4.11.2 Communicate and report public of the anti-corruption of the Company.

5. **Controlling**

5.1 **Internal control system**

The Company has specified the rule of performance, allocating the burden and duties according to the line of command and there shall be a process of procedural approval. This process shall be an internal audit system, review and control procedure to be in conformity with the anti-corruption measure and shall be inspected by the internal auditor. All staff shall perform their work in compliance with the rule regarding the performance and requirement of the Company.

5.2 **Practices in conformity with the anti-corruption Policy**

The Company has specified main procedures and guidelines to prevent the risk of Corruption according to the type of Corruption as follows:

5.2.1 **Giving and receiving the Bribery**

5.2.1.1 The directors, executives and staff in all levels are prohibited to unlawfully call for or receive interest or any property influencing to act or omit their performance or may cause the Company disadvantage of lawful interest;

5.2.1.2 The directors, executives and staff in all levels should omit to offer or give interest or any property to a third party in order to influence such person to act or omit to do thing which is illegal or improper to its duty.

5.2.2 **Giving or receiving Gift / Gratuity, Business Entertainment or Other Benefits**

5.2.2.1 The staff is prohibited to give or receive things or any interest from a Partner or a person who relates with the Company's business, unless it is in a traditional occasion or culture with appropriate value. The receiver shall consider and consult with its supervisor for appropriate instruction;

5.2.2.2 Not receive or give a gift, souvenir in form of cash, cheque, bond, stock, gold, jewel, immovable property or likewise thing;

5.2.2.3 Gift or souvenir with suitable value for reasonable occasion such as giving a calendar, diary, stationary like new year gift is acceptable;

5.2.2.4 If the staff has received a gift, souvenir, gift basket and/or any other thing with value more than 3,000 Baht (three thousand Baht), shall inform its supervisor and return or deliver to the committee of gift classification, unless it is a rotten thing or limited lifetime;

5.2.2.5 The Staff should avoid giving or receiving business entertainment which more than normal practice to business partner relationship, from other person who has its business involving with the Company's business.

5.2.3 **Political Contributions**

The Company shall not assist or support to any political party, political group or politician, whether directly or indirectly, and the Company's property shall not be used for the said operation.

5.2.4 **Charitable contributions, Public Donation and Grant-in-aid**

5.2.4.1 Donating money or property for charity or public interest and giving a grant-in-aid shall be transparent and accurate in accordance with the law and shall not conflict with a good moral and shall not be any act which causes damage to the community at large;

5.2.4.2 Giving or receiving money or property donated for charity or grant-in-aid shall not be used as a bribery;

5.2.4.3 Withdrawal of expense for charity and giving a grant-in-aid shall be in compliance with the rule on withdrawal of expense of the Company's management and Delegation of Authority (DoA) manual of the Company. Such withdrawal shall be specified its objective clearly with evidence support;

5.2.4.4 In the case of doubt that it may have legal effect, shall consult with the legal department in writing or, in other important issue, it shall be under the management's discretion.

5.3 **Staff Rotation**

The Company encourages rotating the staff who are responsible for high risk of Corruption job such as Procurement Division, etc.

5.4 **Guideline on tracking/assessing the performance in accordance with the anti-corruption Policy**

The Company has methods to make all employee to participate in the performance of the said policy in various channels such as training/video provided to new staff on their orientation date as well as there will track and evaluate the performance according to the said policy by surveying the opinion of executives and staff of the Company on the anti-corruption.

5.5 **Guideline on monitoring and controlling to prevent and track risks of the Corruption**

The Company shall follow up and evaluate the risk specified in the operation manual as a standard and shall open a channel for receiving complaints from the staff, public and government sector, etc.

5.6 **Training for the policy and practice of anti-corruption of the Company**

The Company shall provide training and knowledge on the policy and practice of the anti-corruption to staff who are in charge of monitoring or involving to preventing the Corruption in the Company and sent personnel to obtain external trainings provided by organizations in both government and private sectors relating to the Corruption since the staff starting work for the Company and the Company shall provide the Staff trainings on the anti-corruption in the form of both Video and Billboard including announcements and business ethic manual, rule on whistleblowing, complaints relating to the Corruption, rule on giving and receiving gift / gratuity, entertaining customers or other interest / anti-corruption measure.

6. **Guideline on whistleblowing/complaint of the Corruption**

6.1 Upon it found or aware of any performance conflicting with the Company's rule/order or it found any act falling therein or only doubt that there is a Corruption relating to the Company, the Staff shall not neglect or ignore and shall inform its supervisor or a person who is responsible for the said information.

If any doubt or question, shall consult the supervisor or Corporate Governance Division.


6.2 Any person who has found or is in doubt that there is any act which may be deem as Corruption or has been affected due to against the Corruption, shall make a whistleblowing or complaint through any channel of the Company as follows:

- **Website** : www.pruksa.com (Icon: Whistleblowing, Disclosure to the chairman of the Company's Board of Director, the chairman of audit committee, the chairman of the Board of Executives, CEO and Group CEO;

- Directly complain to CEO and Group CEO;
- Directly complain to the head of internal audit;
- Complain to supervisor;

- **By post:**

Attention: Group CEO or Chairman of audit committee of Pruksa Holding Public Company Limited. S.M. Tower 28th floor, No. 979/83 Phaholyothin road, Samsennai Sub-District, Phyathai District, Bangkok 10400

- **Telephone** Contact Center 1739
- **E-mail** cg@puksa.com
- **Line ID** @pruksacg 

In case of there is an issue involving to the executive on high level or the director, shall directly complain the chairman of audit committee.

6.3 The Staff shall cooperate to inspection and give evidence in case of it found any Corruption.

6.4 The Company shall give fair treatment and protection to the whistleblowing staff or the staff who refuses the Corruption, as specified in the rule on whistleblowing / complaint of the Corruption.

7. Recording business information and document keeping

Recording business, finance and accounting information and keeping the record shall be checked correctly and completely and shall follow the procedure according to the Company's rule and shall adhere with the Company's accounting standard. In addition, there shall prepare a financial report and other relevant procedure to be in conformity with the anti-corruption measure and the said documents shall be kept in a safe place in accordance with the Company's rule on document keeping.

8. Sanction

The Company strives to encourage the Directors, Executives and all employees to perform their job with transparency, integrity and anti-corruption, both of directly and indirectly, and shall communicate this policy and the anti-corruption measure to them and public as well as develop their knowledge and understanding for adhering with seriously.

Therefore, omission of compliance with this policy shall be deemed as a breach of the Company's rule and shall be disciplinary punished. Unawareness of this policy cannot be used as an excuse not to comply with and in the event where the Corruption has an offence under the law in consequence, the Company shall be entitled to take action against such offender.

2. Whistleblowing and Complaint of the Corruption Regulation

1. General

Pruksa Holding Public Company Limited ("**the Company**") is a big company with investment in Pruksa Real Estate Public Company Limited, engaging the business of property development in type of townhouse, detached house, and condominium with reliability, transparency, and ethics in business operation. In order to reserve the said reliability, the Company therefore has established a mechanism to protect and mitigate grievance to those who cooperate with the company on the anti-corruption such as whistleblowing or giving information and refusing the Corruption in order to ensure that the said act shall not cause such person grievance and damage.

2. Objective

This regulation is made for being as a practice guideline on whistleblowing, complaint regarding a Corruption and for giving a protection to a whistleblower or a person who gives information including a person who refuses the Corruption.

3. Scope and Guideline

All interested persons of the Company who has found a clue of a Corruption of a staff or executive or director or has been affected from refuse of a Corruption shall give a whistleblowing/complaint through the channels specified herein by the Company. The Company shall protect those who cooperates or reports the Corruption and shall give an accused thereof fairness as well.

This rule is deemed as an integral part of the anti-corruption Policy. All staff shall be bound and adhere therewith.

4. Whistleblowing and Complaint of the Corruption

Upon it found or aware of any performance conflicting with the Company's rule/order or it found any act falling therein or only doubt that there is a Corruption relating to the Company, the Staff shall not neglect or ignore and shall inform such Corruption through the channels specified by the Company. If any doubt or unsureness of its consideration, the Staff shall consult the supervisor or Corporate Governance Division.

The Staff shall cooperate to inspection and give evidence in case of it found any Corruption.

5. Matters received from Whistleblowing and Complaint of the Corruption

(1) Abuse of power for personal exploitation and exploitation for its family, friends, and acquaintances.

(2) Finding any destruction of evidence, distortion or concealment of information, to support the Corruption.

(3) Finding any act which is doubtful that it is a Corruption or there is an event/information which may be deemed as the Corruption.

(4) Receiving an affect from whistleblowing or giving information or giving cooperation on fact-finding or refusing the Corruption such as persecution, demotion, punishment, dismissal or affect causing damage to such whistleblower.

Note: Complaint on problem and or dispute between persons or complaint in form of anonymous letter shall not be deemed that it is whistleblowing/complaint regarding the Corruption.

6. Channel for Whistleblowing and Complaint of the Corruption

A person who has found any doubtful cause falling in the scope of the Corruption or has been affected from refusal of the Corruption shall give a whistleblowing/complaint with or without disclosure of its name, stating facts or sufficient and clear evidence to show that there is a reason to believe that there is a Corruption or it has been effected from the refusal of the Corruption through the following channels either:

6.1 Website : www.pruksa.com (Icon: Whistleblowing, Disclosure to the chairman of the Company's Board of Director, the Chairman of audit committee, CEO and Group CEO;

6.2 Directly complain to CEO and Group CEO;

6.3 Directly complain to the head of internal audit;

6.4 Complain to supervisor;

6.5 **By post:**

Attention: Group CEO or Chairman of audit committee of Pruksa Holding Public Company Limited. S.M. Tower 28th floor, No. 979/83 Phaholyothin road, Samsennai Sub-District, Phyathai District, Bangkok 10400

6.6 **Tel.** Contact Center 1739

6.7 **E-mail** cg@pruksa.com

6.8 **Line ID** @pruksacg 

In case of there is an issue involving to the executive on high level or the director, shall directly complain the chairman of audit committee.

Note: The Company shall examine the complaint by considering reliable facts. However, such whistleblower or complainer should be realized that any dishonest report or report in form of anonymous letter may limit the Company for fact-finding.

7. Protection for Whistleblower and Rejection of the Corruption

The Company has established a mechanism to protect any person who cooperates with the Company of the anti-corruption such as whistleblowing or giving information including refusing the Corruption to ensure that the said anti-corruption shall not cause the whistleblower a grievance and casualty as follows:

7.1 The receiving unit of such whistleblowing shall consider the information at first glance and find supportive information. If it considers that it is reasonable to be thoroughly

inspected, the highest executive of such receiving unit shall approve and deliver relevant units the case for proceeding in compliance with the procedure according to the regulation on corruption and offence management immediately.

7.2 The Company shall protect a person who cooperates with the Company on whistleblowing or refusing the Corruption relating to the Company from grievance, danger or unfair treatment as the result of giving the cooperation to the said anti-corruption.

7.3 The Company shall not demote, punish or cause a staff or an executive who refuses the Corruption in a negative way even if such act has caused the Company loss of business opportunity.

7.4 In case of the whistleblower / complainer is in danger or may be loss, shall request the Company to set an appropriate protection.

7.5 In order for protecting the right of the complainer and a person who gives information, the said information shall be kept confidential, limiting an acknowledgement only for those who are in charge of fact-finding. If it found that there is a misuse of the said information or inappropriate disclosure thereof, it shall be deemed that such act is an infringement and disciplinary offence.

7.6 In the event of it found that a staff or an executive has treated other person unfairly or has caused other person loss with a motive of such other person's whistleblowing /complaint or refusal of the Corruption, it shall be deemed as disciplinary offence.

8. Sanction

A person who willfully or negligently fails to comply with this regulation as well as has a behavior reflecting that it is a persecution, threaten to make a disciplinary punishment or unlawful discrimination as the result of the whistleblowing / complaint against the whistleblower / complainer or a person who involves with the proceedings in accordance with this rule shall be deemed that such person has breached this regulation and shall be responsible for damages arising to the Company and those who have been affected from the said act.

Note: If any rule conflicting with this order, shall adhere with this order from the date of enforcement hereof.

3. Rule on Giving Gift, Gratuity, Entertaining Customers or Other Interest

1. Definition

Company	means	Pruksa Holding Public Company Limited.
Staff	means	A permanent staff, probationary staff, daily staff, staff who has been employed under a special condition by the Company with pay.
Customer	means	A person who make a transaction with the Company in respect of the service rendered by the Company.
Partner	means	A person who makes a transaction with the Company for supporting or promoting the business of the Company.
Business Agent	means	Another juristic person or natural person who is not a staff employed or agreed by the Company, its subsidiaries or associated companies to make a transaction or to contact a third party on behalf of the Company, its subsidiaries or associated companies.
Gift / Gratuity	means	Valuable things both in form of materials, goods and services, whether it is a direct giving or receiving or offering to purchase or sell at special price including paying service fees such as traveling expense, etc.
Business Entertainment	means	Entertainment, providing food and beverages including arranging a party, an entertainment activity for relaxation such as party, sport day, etc.
Other Interest	means	Other interest expressly unspecified herein.

2. Regulation

Giving or receiving Gift / Gratuity, Business Entertainment or Other Benefit from a Customer, a Partner or a Business Agent is prohibited, unless it is in compliance with this regulation:

2.1 Giving Gift / Gratuity or Other Benefits

2.1.1 The Staff is prohibited to give the Customer, Partner, Business Agent or a person involving with the Company, subsidiaries or associated companies or personally Gift / Gratuity or Other Interest which could effect to the Customer's decision making of transaction or the business operation of the Partner, Business Agent or a person involving with the Company, subsidiaries or associated companies.

2.1.2 The Staff is prohibited to give the supervisor Gift / Gratuity or Other Benefits.

2.1.3 The Company, subsidiaries or associated companies has no restriction on giving Gift / Gratuity displayed a logo of the Company, subsidiaries or associated companies traditionally or seasonally.

2.1.4 Gift / Gratuity displayed a logo of the Company, subsidiaries or associated companies shall be in compliance with procurement rule and shall be approved to use the logo of the Company, subsidiaries or associated companies

according to the regulation of the Company, subsidiaries or associated companies from the Corporate Marketing Division.

2.1.5 Gift / Gratuity or Other Benefit provided by section/division for giving the Customer for sale promotion or build up a business relationship is acceptable, but it shall be approved by the highest executive of such unit.

2.1.6 Withdrawal of expense for giving Gift / Gratuity shall comply with the rule and procedure of withdrawal of operating expense of the Company, subsidiaries or associated companies and the manual for approval of operating expense. A form of withdrawal shall specify the name of receiver and objective of the withdrawal every time.

2.1.7 Giving Gift / Gratuity or Other Benefit by a personal relationship such as relatives, siblings, friends, and acquaintances is not restricted under this regulation.

2.2 Receiving Gift / Gratuity or Other Benefit

2.2.1 The Staff is prohibited to receive Gift / Gratuity or Other Benefit from the Customer, Partner, Business Agent or a person who involves with the Company, subsidiaries or associated companies both in a position of agent of the Company, subsidiaries or associated companies or personally.

2.2.2 If it is impossible to refuse Gift / Gratuity or Other Benefit which traditionally or seasonally give, the receiver shall send them to the Human Capital Division within 7 days after receiving such things in order to be allotted to the Staff of the Company, subsidiaries or associated companies or donated for charity as appropriate in accordance with the practice as specified in the attachment.

2.2.3 Receiving Gift / Gratuity or Other Benefit by a personal relationship such as relatives, siblings, friends, and acquaintances is not restricted under this rule.

2.2.4 The supervisor is prohibited to receive Gift / Gratuity or Other Benefit from its sub-ordinate.

2.3 Business Entertainment

2.3.1 Business Entertainment which is reasonable, transparent and relate to business shall be acceptable but it shall not be too extravagant and shall not effect to the decision making on performance of the Staff, Business Agent or a person who involves with the Company, subsidiaries or associated companies.

2.3.2 Withdrawal for Business Entertainment expense shall adhere with the rule and procedure on withdrawal of the operating expense of the Company, subsidiaries or associated companies and Delegation of Authority (DoA) manual of operating expense. A withdrawal form shall specify the name of guests and objective thereof. Withdrawal of expenses arising in an inappropriate place shall not be approved such as an entertainment spot with prostitutes or likewise, etc.

2.4 Accepting an invitation for meeting, visiting provided by the Customer / Business Agent / Partner

Accepting an invitation for meeting, visiting provided by the Customer / Business Agent / Partner shall be allowed, provided that, there shall comply with the following conditions:

2.4.1 It's a must to have a clear map and state the objective of such meeting / visiting and there should prepare a plan in advance and shall follow the specified plan.

2.4.2 Must be approved by a relevant meeting and report the CEO and the Group CEO or must be approved by the CEO and the Group CEO in writing.

2.4.3 After the meeting / visiting, the visitor shall summarize the result received from the meeting / visiting and present to the highest executive of the unit.

2.5 Considerably principle which should be regarded all the time for giving and receiving Gift / Gratuity, Business Entertainment or Other Benefit under this regulation:

2.5.1 Form and value of the Gift / Gratuity, Business Entertainment or Other Benefit must not be extravagant and shall be reasonable.

2.5.2 The receiver and the giver shall disclose, transparent and shall be audited.

3. Sanction

The Staff shall adhere with this regulation strictly and it is a condition of the employment. If any Staff has infringed the said regulation, it shall be deemed as disciplinary offence and shall be further punished under the Company's rule.

Attachments

In the event where the Staff or executive has received the Gift / Gratuity or Other Benefit, shall perform as follows:

1) In the event of such Gift / Gratuity cannot be kept last or displayed the logo of the giver which is a general give or has small value such as food, beverage, calendar, pen, note, etc., the Staff shall inform the supervisor for considering to distribute to other Staff in the unit transparently, fairly and thoroughly.

2) In the event where the Gift / Gratuity or Other Benefit does not fall in the scope of Clause 1, the staff shall inform the details of such Gift / Gratuity or Other Benefit to the highest executive of the unit and the highest executive of the unit or a person designated by the highest executive of the unit shall consider as follows:

2.1) Gift / Gratuity which may have a risk causing damage or increasing cost of delivery too much, it shall make a list of receiving Gift / Gratuity and consider to allot them to the Staff in the unit transparently, fairly and thoroughly and deliver such list with allotment method to the Human Capital Division.

2.2) Other Benefit including Gift / Gratuity which does not fall in the scope of Clause 2.1, shall be made a list and deliver the list thereof to the Human Capital Division to allotting as appropriate.
