

2.7 GIFTS AND ENTERTAINMENT

Gifts and Entertainment Policy

Business Gifts must not be given or accepted, or Business Entertainment hosted or accepted, when intended to improperly influence or reward anyone involved in our business or transactions, or to allow anyone to improperly profit from their position with the Company.

Employees must not seek to influence others, either directly or indirectly, by paying or receiving bribes or kickbacks, or by any other means that is unethical or which will harm our reputation for honesty and integrity. Such behavior is unacceptable in all locations in which we conduct business, whether we are dealing with public officials, other corporations, or private individuals.

Business Gifts and Business Entertainment given to or received from a Business Associate must be:

- Consistent with this policy and any other policies or standards applicable to your job;
- In accordance with applicable law, generally accepted business practices, and ethical standards of relevant jurisdictions;
- Reasonable and appropriate for the occasion;
- Presented openly and transparently; and
- Not be given or received so frequently that it raises any question of impropriety.

Business Associate is a client, prospective client, service provider, vendor, or any third party that has a business relationship with any affiliated company of PFG. Business Associate includes any employee or agent of the Business Associate.

Business Gifts and Business Entertainment must be recorded accurately in our books and records and supported by appropriate documentation.

2.7.1 PRE-APPROVAL AND REPORTING

The Company has the Business Gift and Business Entertainment reporting and pre-approval requirements provided below. All references to USD would include equivalent local currency.

Reports and pre-approval requests can be submitted through the ACA Employee Compliance (**ACA**) system (if available). If the Business Gift or Entertainment submitted is below the required pre-approval limit, the ACA system will provide a “Pass” approval status onscreen and the submission will be auto-approved and logged for aggregation purposes. If the Business Gift or Entertainment submitted exceeds the required pre-approval limit, the system will provide a “Pending” status onscreen, and the entry will be routed to Compliance for review.

I. Business Gift

Business Gift is anything of value given or received, including goods, services, event tickets, use of vacation home or accommodations, etc. Admission to any social event, hospitality event, charitable event, sporting event, or other similar cultural or leisure activity is treated as a Business Gift if the Business Associate does not attend with you.

Business Gift reporting and pre-approval limits apply per business associate per calendar year, aggregate. All Business Gifts are required to be reported in the ACA system.

- **REPORTABLE:** Business Gifts given to or received valued at \$0-100 USD (equivalent to THB 0 - 3,300) .
- **PRE-APPROVAL REQUIRED:** Business Gift given to or received from a Business Associate with value over USD 100 (equivalent to THB 3,300).
- **PRE-APPROVAL REQUIRED:** Business Gift (regardless of value) given to or received from Government officials and employees of government entity or quasi-government entity. Please see Special Circumstances below.

Employees are prohibited from giving or accepting cash or cash equivalents (such as BitCoin, pre-paid credit card, or debit cards) from a Business Associate. Additionally, employees should not give or receive any type of gift cards/certificates from a Business Associate.

II. Business Entertainment

Business Entertainment refers to shared experience involving extending hospitality to one or more Business Associates, or receiving hospitality from a Business Associate, in connection with the business of the Company. Business Entertainment may be a social event, hospitality event, charitable event, sporting event, or other cultural or leisure activity or event, in which a Business Associate accompanies an Employee.

Business Entertainment reporting and pre-approval limits apply per Business Associate per day, aggregate. All Business Entertainment (including meals and drinks) provided to or received from Business Associates required to be reported in the ACA system (unless paid for with Principal credit card as a host and captured within the Principal Expense System).

- **REPORTABLE:** Business Entertainment as a guest valued at \$0-300 USD (equivalent to THB 0 – 10,000).
- **REPORTABLE:** Business Entertainment provided as a host must not exceed (i) USD 500 (equivalent to THB 17,000) per day, per person (all inclusive), aggregate, or (ii) USD1,500 (equivalent to THB 50,000) per annum, per person.
- **PRE-APPROVAL REQUIRED:** Business Entertainment related to Special Circumstances below.

2.7.2 SPECIAL CIRCUMSTANCES

Special Circumstances include Business Gifts or Business Entertainment involving:

- Government officials¹ and employees of a government entity or quasi-government entity² wholly or partially controlled by the government.

¹ **Government official** refers to any individual that is elected or appointed to a government entity, official or employee of a government, or official or employee of a company wholly or majority owned by a government.

² **Quasi-governmental entity** refers to agencies created and funded by the government but enjoy operational and political independence (such as the U.S. Federal Reserve (a central bank)).

- Principal Business Conferences, Sponsorships and Events.
- **REPORTABLE:** All Business Gifts or Business Entertainment provided to or received from Government officials and employees of a government entity or quasi-government entity required to be reported in the ACA system.
- **PRE-APPROVAL REQUIRED:** Business Entertainment provided to or received from Government officials and employees of government entity or quasi-government entity exceeding USD 100 (equivalent to THB 3,300) per day per Business Associate.
- **PRE-APPROVAL REQUIRED:** Business Entertainment provided to or received from Government officials and employees of government entity or quasi-government entity exceeding USD 400 (equivalent to THB 13,000) per year from PAM (cumulative total of all PAM representatives) per each Business Associate.

Periodically, Compliance will conduct independent reviews on the Business Entertainment reported within such pre-approved limits as well as review the aggregated amounts to verify that the annual limits are not, or have not been, breached.

Responsibility

The CO (or designee) is responsible for monitoring and reviewing pre-approval requests and reporting. All Employees of the Company as stated above are responsible to seek pre-approval as required and report Business Gifts and Business Entertainment as stated in this policy.

Limits and Reporting Requirements Chart

Below are THB limits and reporting requirements for Business Gifts and Business Entertainment. Review entire standards for additional requirements. See Section I for definitions.

Limits		Submit Report	Obtain Preapproval
Business Gifts Received from or given to any one Business associate Must not be given to or received from one Business Associate more than four times per year, regardless of value.	THB 3,300 and under per person per year	Yes	No
	Over THB 3,300 per person per year	Yes	Yes
	Gift of any value to government official.	Yes	Yes
Cash	Cash must not be given or accepted.		
Gift Cards/Certificates – Giving	Do not give any type or any amount of gift card/gift certificate to a Business Associate.		
Gift Cards/Certificates – Receiving Gift Cards/certificates for limited products or services , such as a specific restaurant or hotel	Same limits as “Business Gifts” above.		
Cards/certificates for a broad variety of products or services , such as Visa, Amazon or Target gift cards.	THB 850 or less from a business associate on one occasion during the calendar year.	Personal Log	No
	THB 850 - THB 3,300, must be returned or shared with the recipient’s business unit or department.	Personal Log	No
	Over THB 3,300 must be returned.	Yes	No
Business Entertainment Received from/hosted for any one business associate.	THB 10,000 and under per person	Yes	No
	Over THB 10,000 per person	Yes	Yes

Special Circumstances:

Review Section V for details. Other limits and/or requirements may apply when Business Gifts are given or received (i) within 6 months of an anticipated or completed negotiation involving government officials and union officials.

A Business Associate is a client, prospective client, service provider, vendor, or any third party that has a business relationship with a company of Principal Financial Group. A Business Associate includes any representative or agent of the Business Associate.

Note: \$1 = THB 33.30 (rounding)(Approved Currency Rate defined by Management Committee as of 18/06/2025)

Definitions

Approving Officer	Generally, this will be the vice president or higher officer in your reporting line. - o If you are a vice president, then your approving officer is your leader. - o For employees of some affiliated entities, your approving officer could be someone outside your entity.
Business Associate	A client, prospective client, service provider, vendor or any third party that has a business relationship with a company of the Principal Financial Group. A Business associate includes any representative or agent of the Business Associate. Collectively referred to herein as “Business Associate.”
Business Gift	Anything of value given or received, including goods, services, event tickets, use of a vacation home or other accommodations, etc. Admission to any social event, hospitality event, charitable event, sporting event, and other similar cultural or leisure activity is treated as a business gift if the business associate does not attend with you.
Business Gift & Entertainment Reporting Form	The form used to report business gifts or business entertainment.
Business Entertainment	Shared experience involving extending hospitality to one or more business associates or receiving hospitality from a business associate, in connection with the business of Principal. Business entertainment may be a social event, hospitality event, charitable event, sporting event or other cultural or leisure activity or event, in which a business associate representative accompanies any employee. Events should include interaction and relationship building, irrespective of whether any business is conducted during the event.
Cash Gift Cards / Certificates	Cash gift cards/certificates can be a Visa gift card or other type of gift card you can use anywhere. This would also include Amazon gift cards or gift cards to any retailer that is not a specialty retailer (Costco, Target, Walmart, etc.).
Compliance Director	Your compliance director or head of compliance.
Government Official	A government official is any: - o Individual elected or appointed to a government entity, regardless of rank - o Official or employee of a government, - o Official or employee of a company wholly or partially controlled by a government. This includes state-owned entities such as sovereign wealth funds., - o Candidate for political office, - o Political party or official of a political party, or

	o Person acting in an official capacity for any of the above regardless of rank or position.
Nominal Value Items	Items below \$75 (equivalent to THB 2,500) in value, such as cups, caps, t-shirts, pens, plaques and other promotional items from specific events. Items that include a permanently affixed logo are generally considered nominal value items. However, if the item itself has a substantial intrinsic value, such as an iPad, an affixed logo does not make it a nominal value item.
Recordkeeping	Appropriate and complete accounting and expense records, receipts and other related information are required for business gifts given and business entertainment provided to business associates under the Global Travel and Expense Policy. All records must be retained in accordance with our records retention policy.
USD	Our standards are in United States Dollar (USD). Companies outside of the United States can use their currency, however, it should not exceed \$300 USD (equivalent to THB 10,000). unless allowed by your local standards
Valuing Business Gifts and Business Entertainment	The value is determined based on cost using reasonable diligence. If there is a difference between face value and market value of the business gift or business entertainment, use the higher value. Items with logos must be valued at cost and not discounted because they have logos.
Work Address	For hybrid and full time in office employees, your Work Address is the business location assigned to you in the HR System. For remote employees, your Work Address is the address you provide to Principal as your primary work location.

Approved By : Board of Directors
Approved Date : 26 June 2026