

**Code of Business Ethics and Work Performance Guidelines Handbook****2024 Revised Version**

(As approved by the resolution of the Board's Meeting on February 27, 2024)

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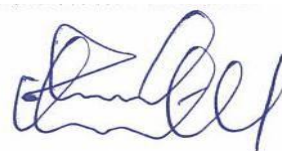
The Company's Board of Directors realizes the significant of the management and good corporate governance principles. The Company, therefore, applies as considered suitable to the Company's business context, the new Corporate Governance Code for Listed Companies 2017: CG Code) suggested by the Securities and Exchange Commission and the Stock Exchange of Thailand. The application aims at strengthening confidences of all stakeholders i.e., shareholders, investors, customers, business partners, creditors, employees, and general public so as to create value and sustainable growth. While assuring the Company's full adherence to good corporate governance with management responsibility that is transparent, fair, just, efficient, and auditable leading to business growth recognizing environment, social, and governance: ESG considered as a crucial fundamental to continuingly and sustainably strengthen business potentiality and growth with long terms benefit to investor.

The Board has instituted the Company's governance mechanism and entrust the Corporate Governance Committee with responsibility for oversight of management principle and business operation in compliance with good corporate governance policy and the principles of good corporate governance set forth by the Organization for Economic Co-operation and Development (OECD), and within the framework of SET's regulations. The social and environmental issues are integrated in the business process including setting direction, vision, mission, strategies, operation process; assessment and reporting. The setting facilitates the committee members as framework for oversight operation process responsive to social and environment while creating sustainable business value.

So as to ensure all employees acquire proper knowledge and have good understanding of rules, regulations, and articles of association as well as code of business ethics and work performance guidelines, the Company regularly carries out related activities and trainings. The trainings require employees to do the pretest-posttest as an evaluation of their learning on the said matters. The evaluation results are regarded as KPI of employees and used as inputs to improve the trainings and communication as well as to ensure employees are fully aware of their duties.



Mr. Wanchai Kunanantakul  
Chairman



Mr. Surasak Kunanantakul  
President

\*\* This Code of Business Ethics and Work Performance Guidelines Handbook was reviewed, revised and approved by the resolution of the Company's Board of Directors and the Corporate Governance Committee Meeting on February 27, 2024.

## **CODE OF BUSINESS ETHICS AND WORK PERFORMANCE GUIDELINES**

### **Business Ethics/Objectives**

The Company's Board establishes the corporate governance policies, code of business ethics and work performance practices which are revised and improved annually or as appropriate so as to keep up with current situations and business environment while conforms with guidelines set forth by the SET, SEC, and relevant governance agencies. In so doing is to uplift the Company's corporate governance (CG) practices to meet international standards, to better create long-term good performances; be able to take on all changes, create value, and responsive to shareholders, stakeholders, and society.

In addition, the Company integrates into its business operations, the 3 principles of Sufficiency Economy: the Moderation, Reasonableness and Self-immunity; as well as knowledge and virtue. Since 2013, the Board has employed, to the Company's practices, the Industrial Product Standards and the Sufficiency Economy Guidelines for Industrial Sector (TIS 9999 volume 1-2556 B.E.) toward economic, social, environmental development for sustainable growth and happiness. Since 2013, the Company has been one among the first group of the companies signing the memorandum of agreement with the Ministry of Industry, the Thai Industrial Standards Institute (TISI), and the Management System Certification Institute (MASCI) to join the program on "Promoting the Sufficiency Economy in Industrial Sector (TIS 9999 Vol. 1-2556) for Sustainable Growth". The Company's personnel participating in the program have gained better knowledge and understanding relating to sufficiency economy guidelines for industrial sector, and have applied to organizational development practices that create equilibrium, sustainability, stability, happiness, and highest returns to shareholders. The clear development procedures are in line with the Sufficiency Economy Principles and Integrative Guidelines for Industrial Sector (TIS 9999 Vol. 1-2556). As a result, on 30 March 2015, the Company received certificate from the Ministry of Industry and the MASCI in collaboration with TISI certifying the Company's application of the Sufficiency Economy in Industrial Sector (TIS 9999 Vol. 1-2556) to its business operations. This has been considered material factors driving the Company toward balanced growth, stability, sustainability with happiness and best returns to shareholders.

### **Monitoring Process**

The Board stipulates that it is a responsibility of every director, executive, and employee to acknowledge, comprehend and strictly comply with the policies and practices as determined by the Code of Business Ethics and Work Performance Guidelines. The Company has no desire of any unlawful act or act in contrary to the ethical principles be committed.

## **Compliance Unit**

The Legal Department shall monitor and evaluate the compliance with legal requirements at least once a year and present the results to the Corporate Governance Committee/Audit Committee for subsequent submission to the Company's Board. This is to ensure full compliance with legal and other requirements including business ethics and anti-corruption measures.

For all employees to operate the Company's business in the same direction, the Company's Board set forth this Code of Business Ethics as part of the Corporate Governance Policy binding all employees to strictly adhere to ethical conducts, respect and treat stakeholders equally, fairly, and be auditable covering material matters including:

1. Director, executive, and employee accountability for stakeholders
2. Treatment of trade competitors
3. Stakeholder and conflicts of interest
4. Respect for law and international human rights principles
5. Confidentiality, safeguarding, use of inside information
6. Procurement, treatment of trade partners and their trading practices
7. Social and community responsibilities
8. Treatment of employees
9. Political support
10. Internal control and internal audit
11. Receiving and offering gifts, assets or other benefits
12. Money laundering prevention and suppression
13. Safety, health, and environment
14. Intellectual property, and use of information and communication technology systems
15. Personal data protection

### **1. Ethics for Director and Executive**

#### **1.1. Director and executive for shareholders**

- Operate business with transparency; commitment to growth, progress, and constant best returns to shareholders.
- Perform duties with honesty, integrity, and fair beneficial to major and minor shareholders as well as all related groups.
- Maintain and safeguard Company's assets from lost, destroyed, waste in vain.

- Regularly disclose adequate, transparent, reliable, complete, and timely information including financial report and other matters related to the Company's business and performances.
- Never disclose any confidentiality of the Company to outsider especially the competitors.
- Never use any corporate information that has not been made public for personal and related persons' interests.
- Not taking any action in a manner that may cause a conflict of interest to the organization.
- Respect shareholder rights in obtaining necessary information, and treat shareholders equally.

### **1.2. Director and executive for employees**

The Company regards all employees as valuable assets and key factors driving the Company toward corporate goals. So as to facilitate work practices of all employees to be effective and enjoyable which in turn creating continuous development, the Company, therefore, determines compensation policy or wage management for employees as follows:

#### **1) Compensation policy or wage management for employees**

- The Company regards all employees as valuable assets who shall be treated equally with appropriate and fair benefits and welfare paid in consistent with their duties, responsibilities and competence.
- The Company determines payment structure which no less than the minimum wage set by the government and compared with payment standards in the same or similar business.
- To ensure job stability for employees, the Company establishes the provident fund consisting of employee's saving and the Company's contribution according to the set proportions.

In addition, the Company has submitted for the certification of Management System of Quality of Work Life (MS-QWL 1:2008) as introduced by the Institute of Human Capacity Building of the Federation of Thai Industries, and the Thai Health Promotion Foundation. The system being adopted serves as an operational framework and according Development of Management System of Quality of Work Life Policy to promote good and healthy life covering 4 well beings: Physical, Emotional, Social, and Spiritual.

#### **2) Management System of Quality of Work Life**

- Appropriately and continuously implements and develops Management System of Quality of Work Life in line with the rules and guidelines provided.
- Promotes personnel training and development to ensure employees gain proper knowledge and skills.
- Ensures employees' happy work life with unity and care.
- Bolsters morality of all personnel.
- Conducts work related threat analysis for mitigation and/or prevention.
- Develops human resources to become valuable assets of the organization.
- Ensures the continuity of performance assessment in accordance with the policies.

### **3) Occupational Safety, Health and Environment of the Workplace**

- The Company shall be committed to creating safe and pleasant work environment so as to protect employees from work related injuries and illness. Workplace environment is created in accordance with the law and requirement pertaining to risk in the workplace and workers who work on the behalf of the workplace.
- It is a responsibility of all employees to cooperate in workplace's activities on the occupational safety, health and environment.
- Risk assessment shall be carried out regularly with according improvement to meet required standards so as to prevent workplace and other related accidents;
- Campaigning to improve quality of life and health of employees;
- Supporting sufficient and appropriate resources to enhance operational awareness in accordance with occupational safety, health and environment in the workplace standards and methods.

### **4) Industrial Sufficiency Economy (TIS 9999)**

The Company has applied, to its business management and operation, the principles of Sufficiency Economy: Moderation, Reasonableness and Self-immunity. Personnel shall possess knowledge and virtue for balanced development covering socio-economic, environmental, and cultural aspects so as to sustain growth, stability, happiness, ability to take on all internal and external changes as well as environmental uncertainties.

- Encouraging employee participation through instilling awareness of being knowledgeable and morale person who is moderate, well rounded, discreet, honest, diligent, tolerate, united, and shared;
- Respecting stakeholders' benefits and legal rights in a proper and fair manner;

- Developing holistic and systematic management to drive the organization, planning, implementation, monitoring, improvement, and information system toward achieving effective and efficient business outcomes;
- Promoting learning and understanding the value of natural resources and eco-system including soil, water, forest, and bio-diversity to foster spiritual upholding, living and interdependence.

### **1.3. Director and Executive for Customers**

The Company fully realizes in and is committed to competency-based development and improvement in various fields by establishing, within the Company, quality systems with reference to the rules governing the Quality Management System ISO9001 and the current Quality Management System for Automobile Sector IATF16949. The policy states that:

#### **“Customer Satisfaction, Quality Orientation, Commit to Organization Development”**

The Company is strongly committed to building quality and satisfaction to serve customers’ needs which is regarded as significant factor fostering business operation. To achieve this, the Company sets up policy guidelines to:

- Place utmost importance on quality to meet customers’ satisfactions;
- Give empathy to truly realize customers’ needs and supply products and services accordingly;
- Commit firmly to constant quality development of products and services to ensure the highest efficiency in every procedure of production process, and timely products delivery;
- Conduct and maintain efficient quality management to meet customers’ needs and the Quality Management Standard ISO 9001:2015 และ IATF 16949:2016;
- Continuously promote personnel development;
- Provide control system to ensure the Company strictly, attentively, honestly, and regularly adheres to the terms of agreement made with customers;
- Provide control system to maintain the confidentiality of customers as if the Company’s own, and to prevent any use of such confidentiality from any frauds.

### **1.4. Director and Executive for Trade Partners**

- The Company treats all partners equally and fairly.
- The Company neither solicits nor accepts nor pays any benefits that would cause dishonest or non-transparent acts to its business partners.
- The Company strictly adheres to the promises given to its partners, whenever the promises could not be kept; partners are informed promptly for mutual resolution.

- The Company provides control system to prevent any disclose or use of its partners' confidentiality for illegal business operation.

#### **1.5. Director and Executive for Creditors**

- Compliance supervision system is in place to ensure actions taken are firmly complied with terms and conditions of contract and agreement made to the creditor taking into account the reputation of the Company.
- In the case where the Company fails to fulfill contractual obligations, the creditor shall be informed promptly for mutual resolution.

#### **1.6. Director and Executive for Public Sector**

- Maintaining good relationship and cooperation with public sector to the extent considered as appropriate.
- Ensuring strict compliance with laws, rules, and regulations issued by the governance bodies.
- Not helping or supporting or be used as a tool of any non-compliance with laws or regulations.
- Cooperating with governance bodies, and reporting information in relation to violation or non-compliance with law or regulation.

#### **1.7. Director and Executive for Environment, Society, and the Public**

Being part of society and community, the Company is earnestly committed to the development and improvement of its Environment Management System (ISO 14001:2015). Cooperation is given to organizations dealing with environmental issues for development of quality of life and environment. The Company, therefore, articulates the environmental policy as follows:

- Implementing pollution prevention and control in compliance with environmental laws, regulations, and requirements;
- Promoting employee participation in pollution reduction with awareness of conservation of natural resources and environment;
- Developing and improving every procedure of the production process recognizing impact on environment;
- Continuously evaluates and reviews for environmental improvement in line with the set objectives.

The Company is committed to conduct its business with social responsibility for sustainable development of standard systems. In this regard, Corporate Social Responsibility Policy is developed encompassing energy conservation as guidelines for CSR implementation.

- The Company strives to run its business under ethical principles and good governance. Also, to take good care of society and environment and be qualified for CSR certification.
- The Company is committed to develop and improve environmental management system standards; and occupational health and safety management system. Implementation in this regard is under the Environment Management System Standards ISO 14001 and Occupation Health and Safety Management System Standards ISO 45001. Also, continually maintains the Quality Management System ISO9001. All aim at sustainable growth along with CSR, environment, and occupational safety;
- The Company shall promote and provides resources as needed including personnel, budget, work hours, training, exchanging ideas for the sustainable development of CSR.
- The Company shall conduct the evaluation of CSR plan and targets at least once a year.

In addition, the Company attaches an importance on efficient energy usage in manufacturing process, the Company, therefore promotes continuous participation among employees on sustainable energy management.

The Company, therefore, stipulates the Energy Conservation Policy as follows:

- The Company shall appropriately develop energy management system by articulating energy conservation as part of the Company's operation which shall be in alignment with related laws and requirements.
- The Company shall continuously improve energy usage to be more effective and suitable to business technology being employed as well as best practices and applicable laws.
- The Company shall formulate energy conservation plan and targets annually and made known to every employee. The Company shall ensure employees understand and act accordingly.
- It is deemed as a responsibility of every executive and employee to cooperate and comply with the set measures.
- The Company shall promote and provide resources as needed including personnel, budget, work hours, training, exchanging ideas for the effective development of energy work;
- The executives and working groups shall review the energy management policy, plan and targets annually.



## **2. Ethics for Employee**

### **2.1. Employee to the Company**

- Employees shall strictly comply with the Company's current articles of association, rules, regulations, and orders.
- Employees shall perform their duties with integrity, devotion, dedication; safeguard Company's property.
- Employees shall be loyal to the Company, not break the law and commit immoral action.
- Employees shall maximize time and asset of the Company and neither directly nor indirectly use for self-interest.
- Every employee shall reveal his/her relationship with the organization, external business institute, or kinship so as to avoid any act that would induce conflict of interest.
- Employees shall conscientiously keep confidentiality of customers and the Company, never use inside information of the Company or customers for self-interest or interest of others.
- Employees shall be careful with comments to external persons concerning matters that may affect the Company's reputation and operation.
- Employees shall not misuse information obtained from the performance of duties or disclose such information to any irrelevant person.
- Employees shall perform on the basis of integrity, ethical conduct, fairness to all, and never in contrary to the laws and good morals. They shall adhere to the cruciality and utmost benefits of the customers as well as of the Company.
- Every employee shall perform the work with discretion and reasonability for the utmost benefits of customers and society.
- Every employee shall perform his/her duties in compliance with general accepted standards, regulations, criteria or other related standards.
- Employees shall acquire adequate and complete information of customers so as to be aware of customer status and needs and be able to properly give advice on each service offered by the Company. They shall keep customers' confidentiality.
- Employees shall not involve in any acts or activity leading to defamation of the Company.

**2.2. Employee for Supervisor, Subordinate, and Colleague**

- Employees shall not provoke, slander or be the cause of quarrels that promote disunity among colleagues. They shall maintain and promote unity and cooperate in a way that is favorable to the work and to the Company.
- Respect for the rights of other employees, not criticize in a destructive manner, and not use other people's work to impersonate one's own work.
- Listen to opinion and recommendation of the subordinate concerning work on duty, listen to supervisor's advice and do not work over supervisor.
- Every employee shall report fact whenever there is an unethical behavior or there is a reason to believe that what has been done is inappropriate which may impact on the Company. The Company shall keep such report as confidential.
- Significant fact from operation must be reported to the supervisor. In particular, if failure to report such information will affect the operation of the customer and/or the Company, or to conceal illegal action.
- Do not slander another executive or employee without fact.
- Employees must not act in violation or threat whether verbal or acting against others on the basis of race, gender, religious, age, physical and mental disabilities.

**2.3. Employee for Oneself**

- Employees must uphold honesty and not receive valuable item or any form of benefit e.g., money, gift from colleague, customer, trade partner or contracting party which may affect discretion and decision of duties or weaken the independence of justice.
- Employees shall perform their duties to the best of their ability and with honesty, integrity, due diligence and accountability.
- Employees shall have a sense of accountability for themselves and their respective duties.
- Employees shall constantly pursue knowledge and improve their work methods to become proficient and effective.

**2.4. Employee for Customers**

- Employees shall keep confidentiality of customers and the Company known from their performance of duties. They must not use such confidentiality for personal

gains or for others or act in conflicts with the interests of customers and the Company, or contrary to the laws.

- Employees must not use customer's information for personal gains or for others which lead to action or decision with conflict of interest of customer, the Company, and shareholders, as the action and decision could incur bias that abstains them from performing their duties with free mind and fairness.
- Employees must not use any inside non-public message or information for personal trading or investment that could cause benefit loss to customers.
- Employees must not disclose any business information or documents given by the customer to outsider or any unauthorized personnel of the Company except as required by law.
- Employees must not exercise power of Company's duties to exploit profits in private trading or investment.
- Employees shall strictly comply with the terms and conditions made with customer, if unable to comply with any of the terms and conditions, they shall inform the customer immediately in the manner that ensures customer's most satisfaction.
- Employees shall attentively give service to customers with a willingness and courtesy. They shall provide useful information and advice beneficial and responsive to customers' requests and problems.

### **2.5. Employee to Public Sector**

- Employees shall strictly comply with public rules and regulations.
- Employees shall cooperate with public sector.
- Employees shall not cooperate with whoever violate official rules and regulations.

### **3. Ethics for Practices with Business Competitors or Anti-unfair Competition**

The Company sees the importance of growing sustainably together with stakeholders and all related groups. The Company, therefore, is committed to fair business operation in compliance with laws. Policy and guidelines for anti-unfair competition practices are articulated to prevent monopoly on trade while promote trade competition in compliance with applicable laws. In this connection, executives and employees of the Company and its subsidiaries shall comply with and be aware of the followings:

- 1) The Company operates its business by free and fair competition. Untruthful accusations, libel, unreasonable or doubtful information to discredit competitors shall not be tolerated.

- 2) The Company shall promote beneficial cooperation with its business competitors when it benefits consumers. Cooperation between the Company and its business competitors shall not take the form of monopoly, trade cartels, decreasing the quality standards of products and services, or price fixing. Personnel of the Company shall, in all circumstances, associate carefully with business competitors and their personnel and shall not disclose confidential information either intentionally or negligently to trade competitors.
- 3) Any merger or acquisition between the Company and its business competitors shall be transparent and after such transaction, the Company shall not use its dominant market power in any way that would harm consumers' interests.
- 4) The Company treats its competitors according to international trade competition principles and legal frameworks.
- 5) Controlling system is in place to prevent any illegal acquisition of trade confidentiality of the Company's business competitors.
- 6) Do not seek confidentiality of business competitors by dishonest or improper means.
- 7) Do not try to defame or discredit business competitors by untruthful accusations.
- 8) Price determination for products and services shall not take the form of predatory pricing, trade cartels including price fixing, bid rigging, market sharing, etc. The Company shall make sure any merger does not create monopoly in the market or unfair competition. It shall also avoid unfair trade practice or use trade bargaining power or dominant market power to set conditions that limit the opportunity or choice of business partners.

#### **4. Ethics for being Stakeholder and Conflicts of Interest**

Directors, executives and employees shall carry out their duties for the utmost benefit of the Company without any regard for personal interest, family or close relationships, and shall not act in conflict with the Company's interest.

Any action creating conflict of interest between the personnel and the Company may weaken effectiveness and incur bias or distrust affecting ability to perform duties ethically. Personal interest may include business activity operated outside the Company, financial benefit or personal relationship.

Conflicts of interests include the following actions:

- Using personal authority for self-interest;
- Using personal authority to assist relatives and close relationships;
- Gaining direct benefit;
- Exchanging benefit by using personal authority;

- Taking property of the agency for personal use;
- Using confidential information of the agency for personal use;
- Doing another job where interest conflict with the original one;
- Having conflict of interest from changing workplaces;
- Exercising authority to hide their guilts.

The actions mentioned above shall include receiving benefits in the form of privileges or reciprocal benefits which shall be in compliance with the following practices:

- 1) The Company's personnel are prohibited from using personal influence of authority in executing transactions between the Company and themselves; any partnership or other legal entity; to which they may belong or their relatives beyond the ordinary welfare and benefits that Company's personnel deserve. Exceptions may be made if conflict of interest is disclosed, and approval is specifically granted, or approval is obtained in principle.
- 2) Directors, executives, and employees must not be partners or shareholders with decision power or be a director or executive in a competitive business or similar to the Company. In the event that cannot be avoided, they shall report their supervisor immediately. Directors, executives, and employees shall report, to their supervisors, every conflict of interest that may arise involving themselves and/or their relatives.
- 3) The Company's personnel and their relatives may enter normal business agreements not influenced by the Company's personnel and such business terms and conditions shall be conducted at arm's length with the Company or its subsidiaries.
- 4) Directors, executives, and employees must not receive money or any benefit personally from the Company's customers, partners, or any others due to their working on behalf of the Company. Any order given for the benefit of the giver is prohibited.
- 5) When agenda items are raised during the meetings, any person with a conflict of interest shall temporarily leave the meeting to allow other attendees to consider, analyze and discuss the item without the influence of such person.
- 6) The Company's Board of Directors and the management shall consider connected transactions between the Company and its subsidiaries or affiliates independently with prudence and honesty, and ethically taking into account the benefits to the Company.
- 7) Directors, executives, and employees shall not seek benefits for themselves or for related persons using the Company's undisclosed information. They shall not act in conflict with the Company's interest.

- 8) Secondment to the Company's subsidiaries or affiliates is allowed with approval from supervisor, management, and director. The Company's personnel shall not accept any temporary or permanent external engagements considered as competing with the Company's business operation or that might cause any conflicts of interest. Exceptions may be made with the specific approval of the supervisor and director of the Company.
- 9) The hiring of relative of the Company's personnel shall be undertaken on a transparent and fair basis, as with others with the same qualifications. The Company's personnel shall not intervene in, influence or facilitate the hiring of their relatives.

## **5. Ethics for Compliance with Laws and Regulations and Human Rights Principles**

The Company pays great respect for laws, culture, tradition, and international principles of human rights in every area where its business is operated, and constantly monitor to ensure the Company's operation does not involve in any human rights violation by adhering to practices beneficial to the society.

Directors, executives, and employees shall act in compliance with the Company's articles of association, rules, regulations, and orders as well as laws and international human rights principles related to the Company's business. Accordingly good practices are defined as outlined below:

- 1) The Company is committed to human rights principles and respects for rights and dignity of directors, executives, and employees. Equal employment opportunities are provided without discrimination, labor deprivation, harassment, or intimidation due to nationality, race, class, gender, age, religious, belief, and social status.
- 2) Executives and employees are provided with equal opportunities for training to improve capacity as required by job positions.
- 3) The Company's personnel shall understand and abide by laws related to his/her roles and responsibilities. In case of doubt, they must consult the Legal Department. When doubt arises, do not proceed without taking legal advice.
- 4) Directors, executives, and employees shall perform their respective duties with integrity, recognizing ethical benefit of the Company despite loopholes in articles of association, regulations and orders of the Company.
- 5) Directors, executives, and employees shall be polite and impartial regardless of nationality, race, class, gender, age, religious, belief, and social status.
- 6) Directors, executives, and employees shall respect for the Thai traditions and culture as well as the good traditions and culture of countries to which the Company doing the business with. Any operation shall be suitable to the socio-economic situations of such

countries so as to ensure operation is in compliance with laws, traditions and culture of respective country of destination.

- 7) Directors, executives, and employees shall respect for stakeholders' rights equally and without violating personal rights, dignity, and discrimination of educational background, rank, race, nationality, religious, and gender.
- 8) The Company strictly adhere to the principles of human rights. International principles of human rights are given to employees to integrate into their respective duties and not to support any business that violates human rights principles.
- 9) Whenever detecting any irregularity which may impact workplace safety, executives and employees shall immediately report to personnel in charge for resolution.

Besides, the Company is committed to perform as suggested by the UN Guiding Principles on Business and Human Rights: UNGPs encompassing 3 pillars: 1. Protect, 2. Respect, and 3. Remedy. The Company also uphold the 10 international principle of the UN Global Compact which are:

#### **Human Rights**

- 1) Support and respect the protection of internationally proclaimed human rights;
- 2) Make sure that they are not complicit in human rights abuses.

#### **Labor**

- 3) Uphold the freedom of association and the effective recognition of the right to collective bargaining;
- 4) Elimination of all forms of forced and compulsory labor
- 5) Effective abolition of child labor;
- 6) Elimination of discrimination in respect of employment and occupation.

#### **Environment**

- 7) Support a precautionary approach to environmental challenges;
- 8) Undertake initiatives to promote greater environmental responsibility;
- 9) Encourage the development and diffusion of environmentally friendly technologies.

#### **Anti-corruption**

- 10) Work against corruption in all its forms, including extortion and bribery.

The Company, therefore, set forth a surveillance process of human rights and review the policy as follows:

- 1) Treat every employee equally and impartially regardless of place of birth, race, gender, age, skin color, religion, disability, disadvantaged, family status, education or any other statuses not directly related to the work operation.

- 2) Provide equal working opportunity, wages, compensation, career advancement, fringe benefits according to the rules, regulations, articles of association, and orders of the Company.
- 3) Foster and promote basic human rights in an applicable manner which is stipulated as the policy guidelines.
- 4) Firmly adhere to the human rights principles, trainings are provided for employees to be able to apply the principles to their actual works and not take part in any activity that would violate human rights.
- 5) Safeguard personal information of employees as confidential; distributing, revealing, transferring of such information to irrelevant person without permission is prohibited.
- 6) Any sexual harassment either against the Company's employees or others having business with the Company is prohibited, this includes verbal and physical sexual abuse, courtship, obscenity, indecency, acquiring pornography.
- 7) In all cases, do not have relationship with any office, organization or person that violates human rights or commits human trafficking.
- 8) Accept social, environmental, legal, cultural diversities in the Company.
- 9) Accept the limitation of language barrier in communication, experience, training, educational background, disability, etc.;
- 10) Assure the aforesaid rights of stakeholders and customers are guaranteed and protected.

### **1. Ethics for Confidentiality, Safeguarding and Use of Inside Information**

The Company shall maintain confidential information from leaking to irrelevant person especially information that may affect the Company and its stakeholders. Directors, executives, and employees must not use information of the Company for self-interest according to the following guidelines:

- 1) The Company shall establish levels of confidentiality and applicable procedures whereby all personnel must understand each confidentiality level. They shall seal confidential information of their respective responsibilities to keep it from being viewed by other persons including personnel of irrelevant companies;
- 2) Personnel shall not disclose confidential information even after their retirement, resignation or termination of their position at the Company;
- 3) The Company shall maintain customer and trade privacy. Personnel shall not disclose private information to the unauthorized personnel of the Company and outsiders unless it is required by law, for court cases, or approved by the Board;
- 4) Inside information is operational and managerial confidential information that is not yet ready to be disclosed to the public. If such information was disclosed, it would impact the



Company, particularly the trading prices of the Company shares on the stock exchange. Personnel of the Company must maintain the confidentiality of inside information and shall not disclose, exploit for self-gain or to affect the Company's benefit;

- 5) Personnel shall receive warnings notices and campaigns regarding the use of inside information via Company's channel of communication, especially in relation to important situations such as the issue of company shares or debentures;
- 6) When employing candidates who have previously worked with competitors or the government, the Company shall enquire and study any confidential agreements the candidates may have had with their previous employers. The Company shall not force the candidate to break their agreements with trade competitors or the government, which might give rise to consequent legal actions;
- 7) Information shall only be disclosed by authorized personnel of the Company. Unauthorized personnel shall not disclose the information to ensure the correctness and consistency of the disclosed information;
- 8) Directors, executives, and employees shall make copies, send facsimile, or store information properly and safely to prevent access of information or confidentiality by irrelevant persons.
- 9) Knowledge shall be provided to directors and management teams concerning report of securities holdings of themselves, their spouse and minor children. Penalty in relation to this as stipulated by the Securities and Exchange Act B.E. 2535 (1992), and as amended as well as the SET's requirements.
- 10) Executives shall report on the change of their securities holdings to the SEC in accordance with Section 59 of the Securities and Exchange Act B.E. 2535 (1992). The report shall be submitted to the Company the same day as submitted to the SEC.
- 11) Directors and top 4 executives shall prepare stakeholder report of themselves and their related persons to the Chairman of the Company's Board of Directors and Chairman of the Audit Committee according to the Securities and Exchange Act B.E. 2551 (2008). So as to ensure the transparency, fairness, impartiality, the reporting shall be submitted once every calendar year and within 30 days from the end date of December.
- 12) Executives shall not use undisclosed information to trade Company's securities before such information is disclosed to the public. They shall not also disclose the essence of such information to other persons.
- 13) Directors, executives, employees or designated persons shall not trade securities at least 1 month prior to the disclosure of quarterly and annual financial statements to the public.

- 14) It is prohibited to take opportunity or use of any information from being director, executive or employee for self-interest or running business in competition with or related to the Company.
- 15) Sanction will be imposed on any director, executive who violates this policy and causes defamation damage to the Company. The Company will cooperate with related governance entities for legal action to be undertaken.

## **7. Ethics for Procurement and Practices with Trade Partners**

- 1) Personnel of the Company who need to procure products and services shall consider needs, value, prices and quality. The procurement process shall be transparent. All vendors shall receive information equally and accurately. The vendor selection shall be made with fair treatment, fair competition and without bias. Selection shall be in accordance with academic standards, with care and suited to the circumstances. Trade partners shall obtain product and service testing as much as possible.
- 2) When contracting with suppliers, Company's personnel shall retain documents relevant to negotiations, drafting, contract making, and contract monitoring as supporting evidence for a specific period.
- 3) The Company promotes fair treatment with and among its suppliers. When procuring products and services. Personnel of the Company should not rush to completion, and shall allow suppliers adequate time for preparation. Contracts shall be fair and drawn up in the presence of a lawyer.
- 4) Negotiation shall be transparent and internal which allows executives to verify.
- 5) Personnel of the Company shall not request for or acceptance of benefit relevant to the procurement. They shall remain neutral, and refrain from close association with suppliers to the extent that might influence their decision making. The personnel must comply with the good practices outlined in the Ethics of being Stakeholder and Conflict of Interest.
- 6) The Company strictly adheres to contractual agreements. If found that either the Company or suppliers fail to comply with the agreement terms and conditions or circumstances arise that render compliance impossible. If possible and without detriment to either the Company or its suppliers, personnel of the Company shall discontinue their work and communication with the suppliers and promptly report to their supervisor to seek corrective action.
- 7) Directors, executives and employees should provide complete factual information for subcontractors, trade partners, suppliers, and co-workers.

- 8) Directors, executives, and employees should refrain from accepting gift; asset; invitation to party, reception, event held for a specific individual or group which the expense is paid by the customer. This is to prevent any hearsay and predisposition to giving privilege thereafter.
- 9) Directors, executives, and employee shall strictly comply with the Company's procurement processes for fairness to all.
- 10) In making public procurement; directors, executives, and employees must not offer or accept bribe in every business operation. Communication with government sector must be transparent, honest, and in accordance with legal requirements.

## **8. Ethics and Practice of Trade Partners**

Besides the aforesaid ethics for procurement and practices with trade partners, the Company has stipulated code of ethics and conduct for trade partners with reference to the compliant practices with national, regional and international related rules and regulations. Also, in alignment with corporate governance and social, economic and environmental responsibilities for business sustainability throughout the supply chain. Monitoring is undertaken to ensure compliance with this code of ethics.

Trade partner means producer, contractor, supplier of products and services, joint venture, dealer, distributor, advisor and/or service provider including juristic person and natural person.

Trade partners of the Company are expected to adhere to this ethics and code of conduct and applied to their business operations as well as their related companies as seen appropriate.

### **8.1. Business Integrity**

#### **8.1.1. Business Honesty, Anti-corruption, Anti-trust**

- Run business in compliance with related trade law and regulations.
- Run business on the basis of righteousness, transparency, integrity, ethics that is auditable.
- Promote fair competition, neither solicit nor accept any fraudulent/corrupt acts nor offer bribe by mean of promising to give money or item or other benefits for their trading advantages.
- Support and cooperate in the fight against fraud or ethical misconduct to government, private, or public sectors.
- Plan for risk management, set up reporting and monitoring mechanism and/or conduct training, for trade partners' employees, to instill awareness of damage stemming from fraudulent acts.

#### **8.1.2. Information Confidentiality**

- Do not disclose essential business information as well as confidential information of the Company or its stakeholders who work for the Company and may have the opportunity to access such information.
- Do not use information for any benefit without Company's permission.
- Do not misuse of the Company's inside information for self-benefit or for others.

#### **8.1.3. Information Disclosure**

- Disclosure personal information accurately, transparently, and completely according to legal requirements.

#### **8.1.4. Intellectual Property**

- Run business according to the law and related requirements concerning intellectual property rights.
- Be aware of the importance of respect for intellectual property rights and verify to ensure work practices do not violate intellectual property rights of others.

### **8.2. Labor Welfare & Human Rights**

#### **8.2.1. Fair and Equal Treatment**

- Treat employees with respect recognizing human rights equally regardless of origin of birth, race, age, skin color, religious, expression of thought, physical condition, social and family statuses, political will, and marital status.

#### **8.2.2. Protection of Labor or Worker Rights**

- Never employ under age child labor as specified by law, in the case of employing labor whose age exceeds as specified by law, such child labor shall be protected according to the law.
- Use of foreign workers shall be in compliance with the law.
- Proper accommodation that is safe and clean shall be provided for labor working at the construction site. Accommodation for children shall be away from the construction site.
- Employees shall have freedom to give recommendations concerning labor treatment according to the labor law, as well as to participate in a negotiation process as provided by law.

**8.2.3. Do not Use Forced Labor**

- Never treat workers as slave labor including physical punishment, intimidation, detention. Workers shall work voluntarily.
- Workers shall be able to take leave or terminate an employment as provided by law if such worker has given appropriate reason to trade partner in advance.

**8.2.4. Wages, Benefits, and Working Hours**

- Allocate appropriate wages based on competency and not less than the amount as specified by law.
- Allocate working hours, overtime, and leave as specified by law.
- Working overtime or during holiday shall be on voluntary basis.

**8.3. Occupational Health and Safety****8.3.1. Work Safety Environment**

- Ensure safety of employees and related persons by creating and promoting healthy workplace.
- Provide basic facilities and necessary equipment to reduce risks stemming from accident and any impact on health that may arise from work performances. Proper first aid equipment shall be also provided in the workplace.
- Emergency plan shall be in place including evacuation drill plan and regular training.

**8.3.2. Product & Service Quality and Safety Standards**

- Guarantee safety standards of the Company products and services taking into caution the safety of customers and related persons.
- Provide only quality products and services that are safe and environmentally friendly and conform with specification as agreed.
- On request during checking process, provide evidence or documents certifying the source of products and services as well as quality standards and safety of production process to the Company and related persons.
- Promote products and services of local suppliers as well as raw materials and standard local products so as to reduce cost and help creating jobs generating income for the locals.

## **8.4. Environmental Sustainability**

### **8.4.1. Avoidance of Hazardous Material and Product Safety Oriented**

- The Company shall be informed whenever the hazardous material or chemical substance are used with impact on the environment stemming from production and/or services provided to the Company. Clear relocation and disposal plan shall be in place as specified by law and shall not affect surrounding communities and societies.

### **8.4.2. Efficient Use of Resource and Reduction Waste & Pollution**

- Effective use of energy and resources.
- Effective waste management with suitable measures for environmental conservation.
- Promote the use of standard local raw materials and products.
- Promote cooperation in Company's activities concerning climate change, conservation of natural resources, and bio-diversity so as to help maintaining ecological balance.

## **8.5. Efficiency Improvement / Business Innovation**

Collective action to exchange knowledge and experiences aiming at continuously improving working process to increase business efficiency and innovation in the supply chain.

## **9. Ethics for the Community and Social Responsibilities**

1) The Company strives to run its business with care for stakeholders, economy, society, and environment in a manner that is fair, honest, ethical in compliance with good governance as well as recognizing impact on the organization, society, and environment.

To give back to the society and community, the Company is committed to continuously develop and improve environmental management standards (ISO 14001) as well as cooperate with other organizations in environmental quality development. The Company, hereby, defines environmental policy as follows:

- The Company's pollution prevention and control is strictly managed and practiced in accordance with the provision or law, rules, regulations, and environmental requirements.
- Focus and promote all employees to participate in pollution reduction with awareness to conserve resources and environment.

- Develop and improve the production process bearing in mind impact on environment.
- Evaluate and review to continuously improve environment in alignment with the set objectives and goal.

For every employee to be aware of environmental, occupational health and safety management as well as effective energy consumption with continuous work process improvement to reduce pollution and impact on environment and conserve natural resources; the Company, therefore, assess Carbon Footprint for Organization leading to management guidelines to effectively reduce greenhouse gas arising within the organization. Accordingly, the following policy guidelines are outlined:

- Set forth annually the objectives and plan for greenhouse gas management and communicate to all employees for cooperation;
- It is an obligation of every executive and employee to cooperate in the greenhouse gas management of the Company;
- The Company shall promote and support on various matters as appropriate including human resources, budget, training, and participation of employees in the present of ideas for development of greenhouse gas management;
- The Company shall convey environmental concept and guidelines for practice to its suppliers for environmentally friendly production processes that minimize energy use through the supply chain.
- Executives and the working group have the greenhouse gas management policy, plan and targets reviewed and evaluated annually.

2) The Company strives to run its business with social responsibility with its performances in various sustainable standard development. The Company, hereby, institutes the social responsibility policy and energy conservation as guidelines for social responsibility practices.

- The Company runs business following ethical principles and good governance coupled with caring for society and environment toward receiving Corporate Social Responsibility certification.
- The Company is committed to develop and improve system standards of environment, and occupational health and safety in the workplace. Operations following ISO 14001, ISO 45001, and ISO 9001 aim at enhancing organizational growth as well as social responsibility, environmental, and safety in the workplace.
- The Company shall promote and support as seen necessary human resources, budget, work hours, training, for the development of social responsibility in every aspect. Suggestions in relation to this is taken into further action for sustainable development of CSR.

· The Company review and assess the CSR objectives and plan at least once every year.

3) The Company is fully aware of the importance effective use of energy with continuous participation in energy management of all employees. The Company, hereby, defined as guidelines for energy conservation practices.

- Develop an appropriate energy management system as part of Company' operation in compliance with law and related requirements.
- Enhance effective use of energy in accordance with the business, technology used, best practice, and related law.
- Energy objectives and plan shall be communicated to every employee for understanding and compliance.
- Stipulate the energy conservation as responsibility of every executive and employee of the Company.
- Promote and support human resources, budget, work hours, training, for the development of energy conservation. Suggestions in relation to this is taken into further action for sustainable energy development.
- Review and assess the energy conservation objectives and plan once every year.

4) The Company apply the principles of Sufficiency Economy as suggested by the Standards and the Sufficiency Economy Guidelines for Industrial Sector (TIS 9999 volume 1-2556 B.E.) for sustainable development under 3 Rings, 2 Conditions, and 4 Principles as follows:

- |              |                                    |
|--------------|------------------------------------|
| Ring 1:      | Moderation                         |
| Ring 2:      | Reasonableness                     |
| Ring 3:      | Good immunity                      |
| Condition 1: | Knowledge                          |
| Condition 2: | Virtues                            |
| Principle 1: | Involvement of people              |
| Principle 2: | Respect of stakeholders' interests |
| Principle 3: | Holistic management                |
| Principle 4: | Systematic approach to management  |

5) The Company seriously and continuously strives to fulfill its social responsibilities regarding quality, safety, health and environmental protection, using natural resources efficiently with due regard to the safety and environmental awareness of its stakeholders. The Company also supports environmental conservations and the sustainable development of the quality of life in the community members.



6) The Company will publish information about the business, its social responsibilities and its environmental responsibilities without concealing disclosable information. The Company shall collaboratively and rapidly disclose information to shareholders and any interested parties.

7) The Company shall consider alternative use of natural resources to alleviate adverse effects on the community, environment and quality of life. The Company supports the reduction in consumption of energy and resources.

8) The Company shall instill awareness of social and environmental responsibilities in all personnel at all levels. The Company shall also associate with suppliers who share its concern for social and environmental responsibility. The Company shall lead the efficient conservation of energy for the benefit of future generations.

9) The Company shall use a portion of its profit to support appropriate social and environmental activities that actually benefit community, society and environment. In the case of donation, the Company shall review recipient information and ensure that any donation it makes is for charity purposes, effectively and efficiently used and adequately documented.

#### **10. Ethics for Treatment of Employees**

- 1) The Company treats its personnel equally without discrimination regardless of origin of birth, race, gender, age, skin color, religion, disability, financial status, family, or educational background, or other status that is not directly related to their working performance.
- 2) The Company shall provide all employees the opportunity to perform to their best ability with reasonable compensation. The Company shall motivate employees by determination of salaries, bonuses and operating expenses under the company's regulations. In addition, the Company shall provide its employees with opportunities for university education as well as short-term and long-term trainings.
- 3) The Company personnel shall perform their duties to the best of their ability and with integrity, fairness, morality and ethics, and responsibility. The Company personnel shall not assign any other person to complete their work, neither directly nor indirectly, except, when necessary, in specific circumstances or under time constraints when there is no concern over specific capability requirements.
- 4) The Company personnel shall perform their duties within the chain of command, receiving orders from and being directly responsible to their supervisor. The chain of command should only be crossed if absolutely necessary. The Company personnel shall refrain from making comments about their supervisors and colleagues that could have adverse effects on the person or the Company. Personnel shall be thoughtfully and reasonably open to the opinions of their subordinates and colleagues without prejudice.

- 5) The Company personnel shall use all Company resources, laborers, premises and other facilities to carry out their assignments. Their use for other purposes or beyond the benefit to which he or she is entitled is prohibited.
- 6) The Company personnel shall be polite and well-dressed and behave in accordance with their roles and the local customs without damaging the Company's image.
- 7) The Company personnel may use their name and position for charity fund-raising that the Company sponsors. The use of their position and the Company name for personal fund-raising is prohibited under any circumstances.
- 8) The Company personnel shall cooperate fully with Company activities organized to promote unity, harmony and cooperation, including those involving corporate social responsibilities.
- 9) The Company personnel shall not cause trouble, annoyance, assault, or demean other personnel or outsiders. Prohibited behaviors include: sexual assault, insults, verbal or visual obscenity and sexual harassment.
- 10) The Company promotes the use of employee rights according to the law on labor unions and state enterprise relations. The Company will not do anything that interferes the union's activity except such action is severely against the law, business ethics, or cause damage to the Company.

#### **11. Ethics for Political Support**

The Company is a politically neutral organization and does not give any form of support to any political party, group, or politician at the local, regional, or national level.

The Company upholds the democratic regime of government, and encourages its directors, executives, and employees to exercise their political rights in compliance with law. This is for the Company to operate business without pressure of political parties and public sector. Directors, executives, and employees shall adhere to the following practices:

- 1) The Company supports political activities in a democratic system. All personnel are prohibited from using the Company's authority or resources neither directly nor indirectly to support political activities of any political party, group, or politician;
- 2) The Company encourages its employees to exercise their rights as provided by law. They are prohibited to join any activity which may lead to misunderstanding that the Company has involved in or supported a political party;
- 3) The Company supports its personnel to express, join, support, exercise their political rights outside office hours, using their personal resources. All personnel are prohibited from using the Company's authority, resources, capital or reputation for fundraising or political purposes;

- 4) By all means, every authority and employee is prohibited from giving order or persuading other employees or subordinates to join political activities;
- 5) Directors, executives, and employees shall avoid making political comments in the workplace or during work hours as it may cause conflict of ideas.

“Political Support” means financial or other forms of support neither direct nor indirect to support political activities e.g., giving loan, items or services; advertising; donating money to the organizations having close ties with political parties in the manner that may induce wrongful reciprocal benefits.

## **12. Ethics for Internal Control and Internal Audit**

- 1) The Company shall establish a good control environment with a positive attitude towards internal control and appropriate assessment of significant risks that may impact the company’s objectives, goals and success. The Company shall set up appropriate controls for all levels and functions of the entity and provide adequate, reliable and appropriate information technology and communication to both internal and external parties. The Company shall create a monitoring and evaluation system to ensure that internal controls are being implemented appropriately, support the company goals and continually improve to reflect changing circumstances.
- 2) The Company shall establish dedicated unit directly responsible for risk assessment and risk management, internal control assessment and compliance monitoring reviews. The results in connection to this shall be used to improve the controlling measures to suit changing circumstances and risk factors. In this regard, top and middle executives shall cooperate.
- 3) The Audit Committee shall review the internal control system, risk management system and internal audit system, and report the results to the Company’s Board and shareholders.
- 4) The Company shall establish an independent unit which is well equipped with sufficient competent and ethical personnel directly responsible for effective internal audit.
- 5) The Company shall educate personnel to understand and cooperate with internal control and audit systems. Transaction reports shall be regular, precise, accurate, consistent, up-to-date and appropriately reviewed to ensure that the process is strictly followed.
- 6) Every personnel of the Company shall support and provide accurate information to the Internal Audit Unit as well as the Company’s auditor. Personnel are responsible for the accuracy of financial information and must report any mistakes or suspicious cases immediately.

**13. Ethics for Receiving and Offering Customary Gifts, Assets or other Benefits**

- 1) Directors, executives and employees must not solicit /accept pecuniary, favor or do anything dishonestly or beyond the norm of any party associate in the business with the Company.
- 2) Directors, executives and employees must refrain from soliciting/accepting pecuniary, favor, or other benefits from a person or juristic person running business with the Company neither for themselves nor others that might induce wrongful acts or lead to the carrying out/omission of their duties, or commit any wrongful act.
- 3) It is prohibited to give/receive/offer anything for the undue advantages of the third parties e.g., government official, broker, dealer, partner, or decision maker, that may induce particular person to illegally carry out or omit from their duties or professional services, or for exchange of undue privileges. Giving or receiving donation or sponsorship shall be transparent, lawful, and shall be made certain that such donation and sponsorship is not used as an excuse for bribery.
- 4) In the case of the juristic person or contracting party offering any gift or benefit to executive or employee as a reward, such executive or employee shall discreet if the offer is proper and/or bona fide. They shall also take into discretion the public rules and regulations as well as the impact on business relationship. However, the value of the gift shall not exceed the amount prohibiting public official to obtain.
- 5) Receiving gifts or assets shall be limited to reasonable and bona fide expenditures. Such gift or asset shall not be a contraband.
- 6) In either case, personnel and family members shall not solicit or receive gifts, assets, or any other benefits from contractors, sub-contractors, customers, business partners, or contracting parties that may improperly affect the recipient's independence of judgment towards the giver.
- 7) Personnel of the Company shall neither bribe nor give equivalent benefits of any form to other personnel of the Company or the third parties especially public officials. Giving gifts, assets or other benefits to public officials either local or international shall not breach any applicable local laws and customs.
- 8) Receiving and giving gifts between authorities and subordinates with value exceeding the norm are prohibited.
- 9) Directors, executives, and employees as well as family members shall neither receive from nor offer to partners or anyone anything or benefits being involved in the business with the Company. Except the receiving or offering is for the advantage of business operations or practices generally accepted as tradition.

- 10) The Company's joint business operations with other organizations e.g., public sector, enterprise, private sector either local or international shall be transparent, fair, and in compliance with applicable Thai and foreign laws as the case may be.
- 11) Directors, executives, and employees shall provide knowledge and understanding for customers, business partners, contractors, persons or juristic persons doing business with the Company, concerning the Company's intent to anti all forms of corruption. Those who found such actions shall report the Company promptly.
- 12) Directors, executives and employees are prohibited to give/receive bribery in any business operation. Contacting with government sector shall be transparent, honest, in compliance with applicable law.
- 13) Giving or receiving donations or sponsorships shall be transparent, lawful, and shall be made certain that such donations and sponsorships are not used as an excuse for bribery.

#### **14. Ethics for Prevention and Suppression of Money Laundering**

The Siam Steel Service Center Public Company Limited conducts its business in compliance with laws pertaining to the prevention and suppression of money laundering as well as international measures on prevention and suppression of money laundering and anti-sponsorship to terrorism. In respect to this, the Company establishes the policies on prevention and suppression of money laundering and anti-sponsorship to terrorism, customer acceptance, risk management concerning money laundering of the customers. The Company also stipulates the compliance oversight in accordance with the Prevention and Suppression of Money Laundering and Anti-sponsorship to Terrorism Policy.

##### **Prevention and Suppression of Money Laundering and Anti-sponsorship to Terrorism Policy**

It is ethical for the Company to articulate policies and guidelines for practicing the prevention and suppression of money laundering and anti-sponsorship to terrorism. The Company is committed not to be a source for money laundering and not to provide financial support to terrorism. The Company acts in compliance with the law pertaining to the prevention and suppression of money laundering and other related law as provided by the Anti-Money Laundering Office.

The Company defines the policies and measures to support the said policy including Customer Acceptance Policy, Risk Management of Customer's Money Laundering Policy, Examination Measure so as to acquire the customers' facts. The Company shall ensure the effective compliance of its personnel with the policies, measure and practices.

**Customer Acceptance Policy**

It is the responsibility of the Company to ensure customers identification are presented and verified prior to granting acceptance approval according to the law pertaining to the prevention and suppression of money laundering.

**Risk Management of Customer's Money Laundering Policy**

It is the responsibility of the Company to manage customers' money laundering risks prior to granting acceptance approval according to the law pertaining to the prevention and suppression of money laundering.

**Examination Guidelines for Customer Fact Finding**

It is the responsibility of the Company to regularly and continuously examine for fact finding of the customers, to the termination of relationship with such customers, according to the law pertaining to the prevention and suppression of money laundering.

**Compliance Oversight according to the Prevention and Suppression of Money Laundering and Anti-sponsorship to Terrorism Policy**

- 1) Directors, executives, employees, dealers, brokers of the Company shall comply with the policies and practices pertaining to the prevention and suppression of money laundering and anti-sponsorship to terrorism.
- 2) The Company entrusts the executive with an oversight authority to ensure the compliance with the law pertaining to the prevention and suppression of money laundering. Such executive shall act as a contact person with the Anti-Money Laundering Office.
- 3) Measure is in place to control money laundering and anti-sponsorship to terrorism risks incurred from the Company's services.
- 4) The Company promotes knowledge and understanding of directors, executives, employees, dealers, brokers of the Company regarding the prevention and suppression of money laundering and anti-sponsorship to terrorism to the extent that they are able to act in compliance with such law.
- 5) The Company establishes orders, regulations, and work performance handbook in alignment with the Prevention and Suppression of Money Laundering and Anti-sponsorship to Terrorism Policy.
- 6) Management of all levels, employees, dealers, brokers of the Company must comply to the policy and guidelines for practices concerning the prevention and suppression of money laundering and anti-sponsorship to terrorism.

**15. Ethics for Safety, Health and Environment**

- 1) The Company establishes work system focusing on proper safety, health and environment in the workplace. Workplace shall be clean and hygienic to ensure personnel and contact persons are safe from accidents and illness.
- 2) Directors, executives, and employees shall pay serious attention to any event or activity that promotes occupational safety, health and environment. Operations in this regard shall recognize environment and be carried out with sense of safety.
- 3) Strictly comply with law and articles of association concerning occupational safety, health and environment.
- 4) Safety is importance to the Company and will establish rules and standards for quality, safety, health and environment protection that meet legal requirements and international standards, and will require personnel to understand and strictly adhere to them.
- 5) The Company shall make every effort to avoid and prevent losses from accidents, fire, occupational illness and injury, loss or damage of assets, violation of safety measures, improper working practices and other errors. The Company will maintain a safe working environment and regularly train its personnel on safety and security plans. It is the responsibility of management and employees to report any accidents and incidents following the required procedures.
- 6) The Company shall have internal communications with employees, contractors' staff, and relevant stakeholders to educate them on policies, regulations, procedures and precautions related to quality, safety, health and the environment and shall act accordingly to protect their health, assets and environment.
- 7) The Company is committed to seriously and continuously demonstrating social responsibility by recognizing the importance of quality, safety, health and environment and will maximize the benefits of natural resources for the well-being and safety of all stakeholders. The Company will support social activities to protect the environment and enhance the quality of life in the community in accordance with the principles of sustainable development.
- 8) If the Company discovers non-compliance with the rules and standards regarding quality, safety, health, and environment, or if unsafe operations that severely affect the environment, are discovered, personnel will be required to temporarily cease such operations and notify colleagues, supervisors and related business units for further actions or plans for resolution. Continuing operations in these circumstances shall be strictly prohibited.

## **16. Ethics for Intellectual Properties and Use of Information Technology and Communication System**

- 1) Personnel of the Company shall use only the Company's information technology and communication to communicate with outsider for the benefit of the Company.  
Communication in this regard shall be with discretion, precaution, respect the copyright of the owner of the intellectual property.
- 2) Directors, executives and employees shall safeguard and maintain the Company's assets, intellectual property, respect the copyright of the owner of the intellectual property, use information technology and communication systems beneficial to the Company in conformity with applicable law.
- 3) The Company supports its personnel in conducting research and the researcher shall own the related rights and returns from their studies. However, the Company shall own the exclusive rights, patent submission rights, patent exclusive rights, and any benefits, associated with any such research commissioned and undertaken by the Company, based on the Company's information or knowledge within the Company.
- 4) Directors, executives and employees must disclose and provide the any return incurred from the invention and development undertaken by commission of the Company whether in whole or in part, and whether or not such intellectual property is already protected by law.
- 5) Personnel of the Company shall protect the confidentiality and prevent any leak of the company's trade secrets, secret formulas and secret business methods.
- 6) The Company encourages its personnel to use the Internet to support their work.  
Personnel shall not perform any act that might interfere with or cause disruption to others on the computer and Internet system in the office. Personnel shall not use the Company's computer system to release inappropriate information that is against the law, morality, culture or tradition; e.g., causing damage to reputation or property, propagating pornography, sending spam email, disrupting mail forwarding, or advertising merchandise or businesses that are irrelevant to the Company's products and services.
- 7) Personnel of the Company shall use only copyrighted computer software. In the case of performing duty using computer outside the office, such personnel shall make sure the computer is copyrighted and consultation with supervisor is required before using the computer. Either installing and operating invalid copyright computer software in the office; or piracy of copyright, patent, intellectual property and/or trademarks of any person are prohibited.



- 8) Any computer or software and information technology and communication systems are regarded as properties of the Company. The management and employees shall not use computer and information technology for self-interest.
- 9) The management and employees are prohibited from disclosing the Company's business information including the purchased information whether or not in the Company's database, or copying information on personal storage media without permission.
- 10) The management and employees are prohibited from changing, duplicating, deleting, or destroying the Company's information without permission.
- 11) The management and employees are prohibited from using illegal software, and copying copyrighted software for any reason without permission from the producer of such software.
- 12) The Company shall review, supervise, monitor, investigate and control the use of its information technology system by its personnel to ensure the Company's information system security.

#### **17. Ethics for Protection of Personal Data**

The Company ensures the personal data of customers, partners, employees, and/or the Company's business-related persons are correctly and confidentially kept, used, and retained. The use of personal data is bona fide with consent of data owner. The Company establishes Protection of Personal Data Policy as follows:

- 1) The Company extremely respects privacy of customers, partners, employees and related persons;
- 2) The Company collects only personal data necessary for administration or as required by law and shall obtain only from the data owner;
- 3) The Company shall inform of the objectives, usage, retention, rights concerning collecting of such data to the data owner for consent in the first place;
- 4) The Company shall establish the personal data using, processing, storing systems which shall be well safeguarded and confidential;
- 5) The Company shall entrust personnel in charge of personal data control, review/ approval so as to ensure the data is used according to the objectives and within the consent of or not cause any damage to the owner;
- 6) Data with special control e.g., ethnicity, political opinions, belief, religious cult, illness, criminal record, if necessary for use, the Company shall obtain consent from the owner.
- 7) Data owners shall have the rights to simply access, check, withdraw consent of the data throughout the period of data retention;

- 8) In case the foreign data owners, the Company shall keep, use, and retain as same as the Thai data owners;
- 9) In case of sending data to outside bodies or overseas, the Company shall strictly comply with applicable law;
- 10) The Company shall keep the aforesaid personal data as the Company's assets. Violating, disclosing, accessing for personal interest or destroy such data without permission from authorized personnel are prohibited. Failure to comply shall face maximum penalty and prosecuted as well as to pay full compensation for the damage incurred at the rate specified by law.

All related employees must comply with the said policy and practices.

Personal Data means any information relating to an identified or identifiable individual; an identifiable person is one who can be identified, directly or indirectly; excluding information of the deceased in particular.

#### **18. Compliance and Review**

It is a responsibility of every director, executive, and employee to strictly comply with the policies articulated in this code of ethics handbook. Oversight of the compliance in this regard shall be the responsibility of all level of management to their subordinates.

The Company's Board of Directors and the Corporate Governance Committee require the review of this Code of Business Ethics and Work Performance Guidelines Handbook annually.

#### **19. Amendments and cancellations**

The Company shall have the duty to amend this code of business ethics to be in alignment with related law, regulation, and business environment. Any employee sees terms and conditions in any clause that needs revision, he/she shall inform the management for further consideration and amendment.

\*\*\*This code of ethics may not cover all cases, if in doubt, employees shall consult their supervisors. If conflict arises, decision of the Executive Committee shall be final.

## **20. Whistleblowing**

The Company runs its business with transparency under legal framework, ethical principles, and good corporate governance. The Company supports the fight against all forms of corruption. It has established the whistleblowing policy to facilitate all directors, executives, employees, and stakeholders with channels for lodging/reporting complaints, comments, and clues of any wrongful acts, corruption, fraud, impartial acts, lack of diligence and care, and matters relating to corporate governance and code of ethics of the Company. The policy aims at encouraging all personnel to collectively improve or operate in the manner that create righteousness, proper, transparent and fair. Personal information of the whistleblowers and the reported clues are deemed confidential and shall not be abused.

### **Process after Receiving Complaints**

Channels and freedom for lodging complaints and giving comments are provided paving a way to development and sustainability of the organization.

- The recipient gathers and compiles facts relating to the violation or non-compliance with the code of ethics.
- The recipient reports all facts to the Corporate Governance Committee in charge of investigating fact finding for consideration. Contents of the report shall be separated into issues e.g., management, knowledge development, verification of facts.
- The recipient presents the compiling facts to the Corporate Governance Committee for investigation and further determination of measures to suppress the violation or non-compliance.
- The recipient is required to report the investigation results to the complainant for acknowledgement. In vital cases where the complainants reveal themselves, the recipient shall report to Chairman of the Board and/or the Board for acknowledgement.

## **21. Measures to Protect Complainants**

The Company establishes the protection measures for complainants based on the following criteria.

- 1) If the complainants feel unsafe to reveal themselves, in such case the revelation is optional. However, revelation is considered helpful as the Company would be able to inform the complainants of the progress and fact findings.
- 2) The recipient shall keep all information as confidential and well safeguarded. The protection measure is set up to safeguard employee lodging complaint and/or providing information and/or cooperating in an investigation process. They are protected from possible unfair treatments including being transferred, rotated, changed of workplace, suspended, intimidated, harassed, and terminated.

- 3) According to the policy, the Company will not impose relegation, disciplinary action, or any threat on employees who dissent over corruption although this would affect the Company to lose business opportunity. In connection to this, employees are informed through dissemination and campaigning conducted continuously via various activities.

## **22. Disciplinary Actions**

The Company's Board regards the code of conduct and work performance practices as a discipline to which every director, executive, and employee must comply. Violation or non-compliance is considered as disciplinary offense according to the personnel management regulation.

If such violation or non-compliance is considered illegal act, the Company will notify law enforcement official for further legal actions.

Every director, executive, and employee shall have duty to comply with the code of conduct and work performance practices and encourage others to do the same. The following acts are deemed as misconduct.

The Company has no policy to demote or impose any negative effect on employee who dissent over corruption although this would affect the Company to lose business opportunity.

- 1) Non-compliance with code of conduct and work performance practices.
- 2) Persuade, encourage, support others not to comply with this code of conduct and work performance practices.
- 3) Ignore, neglect a violation or non-compliance with the code of conduct and work performance practices.
- 4) Not cooperate, obstruct the fact-finding investigation.
- 5) Unfair treatment to a complainant stemming from the report of non-compliance.