

Corporate Governance Policies and Guidelines Under the “Empathy, Gaining Access, Equality” Frameworks

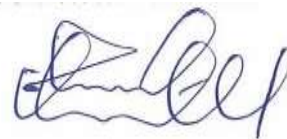
The Company’s Board of Directors realizes the significant of the management and good corporate governance principles. The Company, therefore, applies as considered suitable to the Company’s business context, the new Corporate Governance Code for Listed Companies 2017: CG Code suggested by the Securities 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 accountability that is transparent, fair, just, efficient, and auditable leading to business growth recognizing environment, society, and governance: ESG considered as a crucial fundamental to continually and sustainably strengthen business potentiality and growth with long terms benefit to investors.

The Board has instituted the Company’s governance mechanism and entrusted the Corporate Governance Committee with responsibility for oversight of management principle and business operation in compliance with Corporate Governance Policies 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, strategy, operation process; assessment and reporting. The setting facilitates the committee members as framework for the oversight of operation process with social and environmental responsibility while creating sustainable business value.

This Corporate Governance Policies and Guidelines is regarded as an important tool making the good corporate governance implementable. The Board, therefore, draw up the guidelines for practices in accordance with respective duties and tasks of directors, executives, and employees at all levels to perform their duties with integrity, honesty and fairness both to the Company and all stakeholder groups. It is an obligation of all employees to acknowledge and strictly attach to these guidelines.

The 1/2023 Board’s meeting held on 28 February 2023 considered and approved the Corporate Governance Policies and Guidelines to be effective since 1 March 2023 until further changes.

Announced on 28 February 2023



(Mr. Surasak Kunanantakul)
President

Corporate Governance Policies

The Company's Board of Directors realizes the importance of the management and good corporate governance principles. The Company strictly adheres to the principle of good corporate governance practices for listed companies to ensure the Company's sustainable growth and promote trust among stakeholders i.e., shareholders, investors, customers, business partners, creditors, employees, and general public leading to business value creation and sustainable growth. In compliance with the new Corporate Governance Code for Listed Companies 2017: CG Code issued by the Securities and Exchange Commission and the Stock Exchange of Thailand; the CG Code is applied as seen suitable to the Company's business context. The Board, as agreed by the Corporate Governance Committee, establishes this policy for the directors of the Board as top leader of the organization to adhere to the following 8 principles:

Principle 1 Establish Clear Leadership Role and Responsibilities of the Board

- 1.1 Oversight of corporate governance to ensure the presence of good governance including:
 - (1) Defining objectives and goals;
 - (2) Determining means to attain the objectives and goals through defining strategies, policies for implementation, resources allocation;
 - (3) Monitoring, evaluating, and reporting on performances.
- 1.2 Oversight of corporate governance to achieve the followings:
 - (1) Competitiveness and performance with long-term perspective;
 - (2) Ethical and responsible business;
 - (3) Good corporate citizenship;
 - (4) Corporate resilience.
- 1.3 Oversight the performances of all directors, committee members, and executives to ensure their duty of care and loyalty in compliance with applicable laws, articles of association, and resolution of shareholders' meeting.
- 1.4 Awareness and understanding scope of duties and responsibilities as director of the Board; determination of scope and assignments appropriately given to the CEO and the management with according monitoring.

Principle 2 Define Objective to Promote Sustainable Value Creation

- 2.1 To define and oversee business implementation to ensure the attainability of the defined objectives and goals that promote sustainable value creation for business, customers, stakeholders, and society as a whole.
- 2.2 To ensure that the Company's annual and medium-term objectives, goals, strategies, and plans are consistent with the Company's ultimate goal; and to ensure innovation and technology are applied suitably and safely.

Principle 3 Strengthen Board Effectiveness

- 3.1 To be responsible for determining and reviewing the Board structure, in terms of size, composition, and the proportion of independent directors so as to ensure its leadership role in achieving the Company's objectives and goals.
- 3.2 To select an qualified person as the chairperson of the Board and ensure directors' determinations are independent.
- 3.3 To ensure that the policy and procedures for the selection and nomination of directors are clear and transparent.
- 3.4 To consider whether the remuneration structure is appropriate for the directors' respective roles and responsibilities.
- 3.5 To ensure directors' accountabilities and dedication.
- 3.6 To ensure policy framework and mechanism are in place to appropriately govern the operations of the Company's subsidiaries and business investments.
- 3.7 Conduct annual performance assessment of the Board and committees.
- 3.8 To ensure each individual director of the Board understand the nature of the business, relevant laws; to support all directors in updating and refreshing their skills and knowledge necessary to carry out their roles as directors of the Board.
- 3.9 To ensure operation of the Board is effective with access to required information and supports of directors' line and staff.

Principle 4 Ensure Effective Executive Office and People Management

- 4.1 To ensure proper mechanism is in place for the nomination and development of the CEO, the management and executives.
- 4.2 To ensure an appropriate compensation structure and evaluation are in place.
- 4.3 Understand shareholder structure and relationship which may impact business operation and management.
- 4.4 To monitor the suitability of human resources management and development to the organization.

Principle 5 Nurture Innovation and Responsible Business

- 5.1 To promote innovation creating business value that responsible for society and environment.
- 5.2 To ensure the management ethical operation with care for society and environment.
- 5.3 To ensure the management allocates and manages resources efficiently and effectively throughout the value chain.
- 5.4 To oversee information technology management in alignment with the Company's business.

Principle 6 Strengthen Effective Risk Management and Internal Control

- 6.1 To ensure risk management and internal control systems are in place.
- 6.2 To appoint effective and independent Audit Committee.
- 6.3 To oversee and manage conflicts of interests between the Company, the management, directors of the Board, and shareholders.
- 6.4 To oversee the compliance with the anti-corruption measures.
- 6.5 To ensure a mechanism for complaint acceptance is in place.

Principle 7 Maintain Financial Reliability and Information Disclosure

- 7.1 To ensure accurate, adequate, and timely financial reporting and information disclosure system in alignment with related requirements, standards, and guidelines for practice.
- 7.2 To monitor the Company's financial liquidity and solvency.
- 7.3 To ensure financial solution and management plan is in place
- 7.4 To conduct sustainability report as seen appropriate.
- 7.5 To establish dedicated Investor Relations function.
- 7.6 To promote information dissemination applying information technology.

Principle 8 Support the Participation and Communication with shareholders

- 8.1 To encourage shareholder participation in a Company decision-making on key matters.
- 8.2 To oversee the organization of Shareholders' Meeting to be transparent, effective and on schedule.
- 8.3 To ensure disclosure of AGM resolutions and preparation of the minutes of the meeting is accurate and complete.

(The 1/ 2023 Board's meeting held on 28 February 2023 considered and approved this Corporate Governance Policies and Guidelines to be effective since 1 March 2023 until further changes.)

"Continuing Sufficiency toward Sustainability Success" In addition, the Company's Board has employed as its business operation guidelines, the principles of **Sufficiency Economy Philosophy** as specified in the Guidance on Sufficiency Economy for Industries (TIS 9999 volume 1-2556 B.E.):

- 3 Pillars** : - Moderation, Reasonableness, Self-immunity
- 2 Conditions** : - Knowledge, Virtues
- 4 Principles** : - Participation of Personnel, Respecting Stakeholder's Interest, Holistic Management, Systematic Management

toward balanced economic, social, environmental development for sustainable growth and happiness as well as readiness for uncertainties and changes both internal and external.

The Board entrusts the Corporate Governance Committee as corporate mechanism with responsibilities for oversight of compliance management and business operation with good corporate governance policy and the principles of good corporate governance set forth by the Organization for Economic Co-operation and Development (OECD), the SET's regulations, and the Corporate Governance Code for listed companies 2017: CG Code. The governance policy and other related policies e.g., information disclosure; stakeholder, social and environment treatment; use of Company's internal information and securities trading; internal control; risk management; anti-fraud and corruption; whistleblowing; charter of the Board and committees; code of conduct; and work practice have been considered by the Board at least once a year. The consideration allows the Board to review the Company's corporate governance to ensure the following governance outcomes:

1. Competitiveness and performance with long-term perspective
2. Ethical and responsible business, respecting rights of shareholders and stakeholders
3. Good corporate citizenship
4. Corporate resilience

COMPLIANCE POLICY

For each director, executive and employee to adhere to best practice and to ensure full compliance of the Siam Steel Service Center Public Company Limited with internal and external laws, rules, regulations, orders and articles of association. Director, executive and employee are expected to strive for full compliance with the policy as follows:

1. The Siam Steel Service Center Public Company Limited includes every director, executive, and employee wishing the business to go smoothly and comply with applicable laws and regulations while maintaining righteousness; social, environmental, health safety responsibilities; fight against all forms of corruption so as to fulfill sustainable development. The Company adheres, respects, and comply with domestic and international business-related laws, rules, regulations, and orders. The Company's personnel shall diligently perform their respective duties and be alert for any potential damage resulted from non-compliance or not in alignment with the applicable law, rules and regulations.

2. Executives and employees shall strive for full compliance with laws, rules, regulations as prescribed by external entities as well as with the Company's articles of association, rules, regulations, orders and work practices.
3. The Company, with its obligation to comply with domestic and international laws, rules, regulations concerning trade competition, antitrust in every country where the Company operates; thereby, shall avoid any act including antitrust or unfair competition.
4. The Company strictly complies with laws related to anti-corruption. Offering or receiving any item of value to influence the actions of an official or other person as a bribe is illegal. Thereby, the Company stands firm to its business governance with zero tolerance to such illegal actions.
5. The Company respects and complies with human rights law and presses an importance on human dignity, rights, liberty, and equality of any person being certified or protected by the Thai and international laws.
6. The Company is strongly committed to protecting intellectual property of the Company's and its subsidiaries i.e., copyright patent, petty patent, specialized knowledge and trade secrets from any violation or use without permission. The Company also respects for intellectual property of others and never violate or use without permission.
7. The Company is strongly committed to safeguard its organization from being used by money launder or never give financial support to any terrorist. In connection to this, business guidelines are defined stressing an importance on constant observation and give clue to official concerned whenever non-compliance action is detected as well as on the oversight of financial or property fact finding report to ensure the compliance with domestic and international laws.
8. The Company presses great importance to strictly keep confidential information within the possession of the Company by adhering to the law, business ethics and will not disclose or use such information for any benefit that would induce damage to other person or the Company except in the case where permission is granted or provided by legal obligation.
9. Executives and employees shall strictly commit themselves to act according to the policies of the Company and its group of companies including business frameworks and strategies e.g., human resources management, management of quality of work life, good corporate governance, Industrial Product Standards and the Sufficiency Economy Guidelines for Industrial Sector (TIS 9999), occupational health and safety, environment, quality standard, and other key policies as defined by the Company.

PROCESS MONITORING

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. The Company has no desire of any unlawful act or act in contrary to the ethical principles be committed.

In 2023, the Company reviewed and stipulated the Corporate Compliance Policy constituting part of duties of every director, executive, employee, and any other person working on behalf of the Company to comply with the said policy.

The policy binds executives of the Company to behave as role model whereas every employee shall comprehend and strictly comply with. Any director, executive, and employee act in non-compliance with such policy and code of ethics shall face prompt disciplinary and regulatory penalties.

COMPLIANCE UNIT

Monitoring process is in place to ensure full compliance with code of business ethics, anti-corruption, and laws relating to e.g., environment, energy, occupational health and safety, and employment conditions. The Legal Department as an Compliance Unit is responsible for compliance monitoring and evaluation against code of ethics, anti-corruption measures. The responsibilities include:

1. Compiling, drafting, and revising the Compliance Checklist, law, government rules and regulations, and business agreement for all departments to comply with.
2. Preparing, no later than 15 January each year, the annual assessment plan in alignment with the applicable laws, regulations, code of business ethics, and anti-corruption measures; monitoring the compliance in this regard.
3. Assessing risk incurred as a result of the amended laws and regulations which may affect the operational practices of the Company as well as seeking alternatives to avoid possible negative impacts.
4. Cooperating with responsible unit for alternatives and preventive measures, and presenting the results to concerned units.
5. Monitoring, reviewing and amending legal information and other related information inducing negative impact, assessing risk and other obstacles affecting the Company.
6. Concluding the aforesaid assessments, presenting the assessment results at the management meeting on a quarterly basis for acknowledgement and consideration prior to submitting to the Company's Board.

SUMMARY OF MONITORING RESULTS

The 2023 monitoring and assessment findings have shown that no violation or non-compliance was found according to policy and/or Code of Business Ethics and Work Performance Guidelines, and good corporate governance principles.

In addition, the Board promoted the dissemination of good corporate culture and code of business ethics and work performance guidelines to be well perceived and implementable under the principles of good corporate and ethical business operation. In connection to this, the Code of Business Ethics and Work Performance Guidelines Handbook is prepared and disseminated via E-mail, intranet, and the Company's website.

Throughout the year 2023, trainings on introduction to Corporate Governance were provided for all employees including the new recruits for them to be able to transfer to their actual works in a manner that is responsible, transparent, honest, deliberate, and ethical for their own selves, organization, shareholders, and stakeholders. The Board also supports the events organized to promote work related knowledge and virtues under the Corporate Governance Policy, and Code of Business ethics and Work Performance Guidelines.

ANTI-CORRUPTION PROCESS INDICATOR 2023

The Anti-corruption Process Indicator of the Thai Listed Companies Association whereby the SEC and the Thaipat Institute has certified the Company's good anti-corruption system encompassing anti-fraud and corruption policy and measures which are made known including training to its employees for compliance. As a result, the Company has been certified membership of **"Private Sector Collective Action Coalition against Corruption."** The Company's Board has a strong intension to develop its good corporate governance as it belief that adhering to good corporate governance system and process shall enable the Company to attain sustainable growth.

AGM QUALITY ASSESSMENT 2023

Having been assessed under the "Annual General Meeting: AGM's Quality Assessment Program" jointly carried out by the SEC, the Thai Investors Association, and the Thai Listed Companies Association; the Company received a perfect score of 100 points or "Excellent and Exemplary" **for 13 consecutive years (2011-2023).**

CORPORATE GOVERNANCE REPORT OF THAI LISTED COMPANIES 2023

The Company was assessed under the survey program “Corporate Governance Report of Thai Listed Companies 2013” jointly carried out by Office of the SEC, the SET, and the Thai Institute of Directors. The Company received “Excellent or Five Stars” CG Scoring (CG score 90-100) for **8 consecutive years (2016 – 2023)**. In 2023, **there were 786 listed companies entered for the assessment** whereby the Company received average 98% while the total average of the participated listed companies was 81%.

Corporate Governance Report of Thai Listed Companies Year 2023				
Total Average of Participated Listed Companies	Industry Group	Market Cap. 1,000-2,999 Million Baht	SSSC	SSSC
			2022	2023
81%	74%	74%	93 %	98%

The Company remains in the Top Quartile Company in the market-capitalization group of Baht 1,000-2,999 Million.

SUSTAINABILITY INVESTMENT ASSESSMENT 2023

The Company had been listed on Thailand Sustainability Investment by the SET for 8 consecutive years (2015-2022) reflecting the Company as listed company with an outstanding ESG performance recognizing social and environmental factors of its stakeholders, having in place the management for sustainability e.g., risk, supply chain, and corporate social innovation development.

For 2023, SET announced the assessment result of sustainable stocks of Thailand (SET ESG Rating) and the Company has successfully met the criteria to be included in the final list and received the SET ESG Ratings at BBB level.

In order to uplift the Company’s good corporate governance standard and practice to be in accordance with the ASEAN Corporate Governance Scorecard (ASEAN CG Scorecard), throughout the year 2023, the Board and the Corporate Governance Committee stipulated the policy encompassing principles of the new Corporate Governance for Listed Companies 2017: CG Code as issued by the SEC, shall be applied as seen suitable to the Company’s business context. The policy shall be applied as frameworks for development and improvement covering the following 5 sections as hereunder concluded.

1. Rights of Shareholders
2. Fair and Equitable Treatment of Shareholders
3. Role of Stakeholders
4. Disclosure of Information and Transparency
5. Accountability of Directors

For more details, please visit the Company’s website at www.ssscth.com

Section 1. Rights of Shareholders

The Company strongly recognizes shareholder rights by safeguarding and encouraging the exercise of shareholder rights as follows:

- As owner dictating the Company through the election of directors to manage the Company on their behalf.
- To make decision concerning any significant changes of the Company.
- Be provided with opportunity to propose meeting agenda and to authorize representative to attend meeting.
- Be provided with opportunity to pose question both in advance and during the meeting.
- In due cause and before the meeting date, be provided with adequate documents containing detailed and supporting information for decision making against each agenda item.
- Be informed, in due cause, of the meeting rules and procedures.
- The Company shall encourage the exercise of shareholder rights and not abuse or deprive the rights of shareholders.

Apart from the basic or legal rights of shareholders, the Company also realizes the rights and equities of every shareholder. The Company, therefore, promotes the exercise of shareholders' rights.

Section 2. Equitable Treatment of Shareholders

© The Company firmly attaches to the principles of corporate governance that each shareholder shall be treated with equal treatment to assure shareholders investing with the Company that:

- Every shareholder including shareholder being executive and non-executive, or major shareholder and minor shareholder, and foreign shareholder are treated equally and fairly.
- The Company provides supervision to ensure basic rights of shareholders are equally treated and protected, minor shareholders being violated shall be compensated.
- There is no connected transaction made with relevant companies that may cause significant conflict of interest.

The Board articulates the policy stating **“Transaction shall be executed according to actual fair market value and fair at arms’ length”**

© The Company's Board of Directors provides a policy to eliminate conflict of business interests. A structure and composition of the Board is clearly and transparently defined incorporating a declaration of, in an annual report, the personal securities of directors and the management.

(Additional details could be found in topic 6 Corporate Governance Policy, sub topic 6.1.2 Policy and Guidelines of Shareholders and Stakeholders, and (2) Entering into Connected Transaction)

© The Company's Board articulates policy concerning information disclosure prohibiting the use of opportunity or information benefitted from being a director, executive, or employee for personal advantages; or running business or associated business to compete with the Company. Neither use nor give internal information for sell/purchase of Company's share. Violation or non-compliance with the said policy, shall be strictly prosecuted. The policy is published in the Code of Business Ethics and Work Performance Guidelines Handbook for employees, executives, and directors to acknowledge and strictly comply with. The policy is also available on the Company's website at www.ssscth.com to assure shareholders, investors, general public, and stakeholders that the information is disclosed in an accurate, clear and fair manner and in compliance with applicable laws.

© The Board stipulates the policy that directors and executives shall notify the Company at least 1 day in advance, via the Company's Secretary, prior to trading their securities, and report at the Board Meeting on a quarterly basis for acknowledgement.

© Directors and executives must report their security holdings, and the holdings of their spouses and minor child/children of the Company's securities. Any change related to sell, purchase, transfer, or receive of the Company's securities must also be reported to Office of the SEC according to section 59 of the Securities and Exchange Act B.E. 2535 within 3 business days from the date of the change in such holdings.

No action of violation or non-compliance with the SET and SEC regulations was reported neither trading securities using internal information to carry out connected transaction nor trading assets. There was no connected transaction with any related company possibly induce any significant conflict of interest, and no transaction providing financial assistance to any non-subsidiary of the Company.

Section 3. Recognizing Roles of Stakeholders

The Company's Board of Directors fully recognizes stakeholder rights as stipulated by law or terms of agreement. The Board realizes the relationship and cordial cooperation between the Company and its stakeholders by encouraging cooperation for prosperity, job creation, and the Company's sustainable growth based on financial stability.

The Company, therefore, implements the policy with fair and accountable treatment to all stakeholders including shareholders or investors, employees, customers, business partners, competitors, creditors, communities where the Company's plants are located, society, environment, government sector, and other concerned agencies. The policy is prescribed clearly in the Code of Business Ethics and Work Performance Guidelines Handbook for all personnel of the Company to adhere to.

The Company recognizes an importance of social responsibility in various aspects. Stakeholders are assured that their legitimate rights as provided by laws and agreements are fairly taken care of. The implementation guidance is stipulated based on honesty, integrity, and transparency without any wrongful act against stakeholder rights. Compensatory measures are enforced for stakeholder being violated. The practice of not seeking personal gains that induce conflict of interest to the Company and stakeholder, is defined including keeping and safeguarding the business confidentiality of stakeholders, and cooperating in the fight against corruption.

Measures relating to the provision of clues to the Board is established concerning wrongful act, accuracy of financial report, deficient internal control system or misconduct. The mechanism for whistleblower rights protection is articulated in the Code of Business Ethics and Work Performance Guidelines Handbook and on the Company's website.

3.1 Equality and Respect for Human Rights

The Company fully recognizes basic human rights and dignity of every individual regardless of race, color, gender, language, religious, political will, creed, nationality or social background, property, birth or social status.

The Company has never violated or undermined human rights. It pays great respect for laws, culture, tradition, and international principles of human rights, especially supports and adheres to the United Nations Global Compact: UNGC, and the International Labor Organization Declaration on Fundamental Principles and Rights at Work.

- Avoid action or involvement that would impact on human rights wherever the Company's operates its business with proper rectification to eliminate any impact (if any) stemming from the Company's operation regardless of condition.
- Accept the conduct that beneficial to society and constantly monitor to ensure the Company's operation not involve in any human rights violation.
- Prevent or lessen impact on human rights stemming from business relationship even though the business itself has nothing to do with the impact.

The Company treats all employees equally and fairly without discrimination against race, nationality, religion, gender, age, educational background, vulnerability, disability or disadvantaged. Every employee receives payment based on equal opportunity. The Company's Board sees the respect for human rights as a fundamental of human resources development with direct relation to business added value and productivity.

In 2023, the Company, therefore, has reviewed, revised and approved its Code of Business Ethics Policy on Human Rights as guidelines for ethical business conduct and set forth the whistleblowing process as follows:

Human Rights and Labor Treatment Policy (2023 Revised Version)

Rational

The Company fully realizes that human rights is an equal basic rights and dignity living of every individual regardless of race, nationality, religion, gender, age, educational background, vulnerability, disability or disadvantaged; they shall receive payment based on equal opportunity. The Company never involves in any violation of human rights. It pays great respect for law, culture, tradition, and international human rights, especially supports and adheres to the United Nations Global Compact: UNGC, and the International Labor Organization Declaration on Fundamental Principles and Rights at Work.

To ensure the Company's business is free from human rights violation, the Board institutes the policy and guidelines concerning human rights aiming at protecting human rights from any violation that might arise from activity of the Company (Direct Activity). This also covers its business partner in business value chain, joint venture, that is to say, supplier and contractor.

Scope of Application

This policy shall be applied to every business operation of the Siam Steel Service Center Public Company Limited, its subsidiaries, business partners and the applying of these guidelines by its business partners. The Company also promotes participation of those involved in the supply chain who have given priority to respect for human rights.

Definition of Terms in the Human Rights Policy

Human rights are rights inherent to all human beings, regardless of physical and mental conditions, race, nationality, country of origin, ethnicity, religion, gender, language, age, skin color, educational background, social status, culture, tradition, and other matters according to the law of respective country as well as treaties to which each country is committed to perform. Human rights include the right to life and liberty, freedom from slavery and torture, freedom of expression and association, the right to work and education, and many more. Everyone is entitled to these rights, without discrimination.

Policy

Every director, executive, and employee shall recognize the respect for human rights and place priority on human dignity, liberty, and equality as well as shall act in compliance with related international laws and principles. This is to ensure all business activities of the Company and its stakeholders in the value chain are human rights violation free. The Company encourages its trade partner and business associate to apply this policy to their business operation with respect for human rights. It is stated in the policy that:

1. The Company treats all employees and stakeholders in all sectors equally and impartially without discrimination against origin of birth, race, gender, age, skin color, religion, disability, disadvantaged, family status, education, or any other status not directly related to work operation. Every employee are entitled to rights required by respective laws and has equal opportunity to work; receive wages, compensation, welfare; career advancement; fringe benefits; freedom of association and collective bargaining according to the Company's rules, regulations, orders, safety and occupational health at workplace.
2. The Company has an intention to foster and promote basic human rights in an applicable manner which is stipulated in the Company's policy.
3. The Company strictly adheres to the human rights principles, trainings are provided for employees to be able to apply the principles to their actual work and does not support any activity that would violate human rights.
4. The Company respects the rights of consumers/customers with fair treatment and safeguards personal information of employees, traders, customers and all sectors of stakeholders as confidential; distributing, revealing, transferring of such information to irrelevant person without permission is prohibited.
5. The Company respects the rights of business partners with fair treatment and arranges for a transparent purchasing/procurement for a fair competition as well as encourages its business partners to follow the human rights principles.
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. The Company accepts social, environmental, legal, cultural diversities; ability to communicate; experiences; training; educational background; disability; others.
8. The company opposes the use of violence, child labor and forced labor in all forms, both internally and externally, throughout the organization's supply chain and will not engage with any agency, organization or person that violates human rights or commits human trafficking in all cases.
9. The company supports equal rights of people of diverse sexualities and genders (LGBTQI+) and opposes unfair gender discrimination.
10. The Company recognizes and supports community rights by listening to their voices and participation of community.
11. The company is open to criticisms, comments and suggestions from all stakeholders and does not prevent activities of human rights defenders.
12. The Company organizes human rights due diligence at least once a year and instigates penalties for human rights offenders.
13. The Company assures the aforesaid rights of stakeholders and customers are guaranteed and protected.

Guidelines

To promote respect for human rights and labor rights at work, and to ensure every employee and stakeholder of all groups is protected and respected equally and fairly, the following guidelines are defined thereof.

1. Pay respect to human rights, treat each other with honor and respect on equality basis regardless of physical and mental status, race, nationality, country of origin, ethnicity, religion, gender, language, age, skin color, education, social status, culture, tradition, or any other.
2. Use caution when performing task and monitor human rights related matters so as to prevent any human rights violation risk stemming from business operation.
3. Support and encourage activities to protect human rights.
4. Communicate, disseminate information to cultivate knowledge and understanding; set guidelines; and give support to partner in business value chain, supplier, contractor, and joint venture; for cooperation in an ethical business operation with respect for human rights and treat others in line with this policy guidelines.
5. Oversee and monitor matters relating to respect for human rights, neither ignore nor overlook whenever find action of human rights violation relating to the Company. Informant of such violation action must report to supervisor or person in charge and cooperate in the investigation of truth. In case of any doubt, consult supervisor or person in charge via assigned channel.
6. The Company takes care and protects any whistleblower who reports matter of human rights violation involving the Company by implementing protection measures for whistleblower or informant as stipulated in the Company's Whistleblower Protection Policy.
7. In the case of human rights violation, the Company shall continuously develop and implement the due diligence process of human rights so as to identify and assess risk and its impact for according mitigation and protection measures and plan as well as monitoring and evaluation.
8. The Company shall track and monitor the operation to resolve the human rights violation, follow the tracking and monitoring process as well as provide support and cooperation to mitigate any impact stemming from or relating to the Company.
9. The Company is committed to create and maintain corporate culture with respect for human rights as stipulated by this policy.
10. Whoever violates human rights shall be deemed acting against the Company's Code of Conduct and shall face disciplinary action and may be subject to legal punishment if the act is against the law.

3.2 Intellectual Property or Copyright

The Company articulates policy and guidelines prohibiting wrongful act on breach of intellectual property or copyright of goods which are indicated clearly in the revised Code of Business Ethics and Work Performance Guidelines Handbook 2021 as approved by the resolution of the Company's Board and the Corporate Governance Committee on 25 February 2021 and disclosed on the Company's website.

Policy on Non-violation of Intellectual Property or Copyright

1. It is the responsibility of every director, executive, and employee to safeguard and maintain assets and intellectual property of the Company, respect the copyright of the intellectual property owner, use information technology system and communication media beneficial to the Company in compliance with applicable laws.
2. Personnel of the Company have duty to keep trade secret, trade formula, or business methods as most confidential and no leakage whatever.
3. Personnel of the Company shall use only copyrighted computer software. In the case of performing duty using outside computer, such personnel shall make sure the computer is copyrighted and consultation with supervisor is required before using the computer. Installing and operating invalid copyright computer software in the office; using piracy of copyright, patent, intellectual property and/or trademarks of any person are prohibited.

3.3 Anti- Corruption

Anti- Corruption Policy

The Company conducts its business according to fair competitive strategies focusing on good quality product. Any form of corruption i.e., offering, promising to give, requesting, demanding, giving or receiving bribes, inducing illegal acts or sabotaging trust is not accepted whatever. This shall apply to all businesses and transactions in every country and entity, individual person and group of persons. Such person or group of persons could be executive, or employee of the Company or any outsider involves in illegal act for personal or partisan advantage not limited to the monetary form.

The Company became a member of **Thailand's Private Sector Collective Action Coalition Against Corruption (CAC)** so as to demonstrate its intent and determination to combat all forms of corruption.

The anti-corruption is defined thereof.

1. Directors, executives and employees shall never solicit or receive the benefits or property neither direct nor indirect that would induce the Company's loss or damage resulted from their action or negligence of action under their responsibilities.
2. Directors, executives, and employees shall never offer or give any benefit to outsider and stakeholder that would induce such person to act wrongfully or omit to perform his responsible duty.

3. Any act construing fraud/corruption shall be deemed serious offense and shall face disciplinary action or legal proceedings. This anti-corruption policy shall be applied to every business in every country or agency doing business with the Company. Implementation of this policy shall be carried out regularly including the review of performance guidelines and requirements in alignment with the changing business, regulations, articles of association, and legal requirements.

The Company defines anti-corruption detailed procedures to ensure the compliance with the policy to fight against fraud and corruption. The procedures are reviewed constantly in order to keep track with changing laws, business, and maintain the Company's reputation. This policy shall bid every director, executive, and employee of the subsidiaries, associate companies to comply the same.

Definition of Terms in the Anti-corruption Policy

"Fraud" is intentional deception to secure unfair or unlawful gain for oneself or other including the followings acts:

1. **Asset Misappropriation** is the intentional, illegal possession of the property, of another person or of another person being co-owner, for one's own or third parties.
2. **Embezzlement** is an act of depriving other person by giving false statement or concealing facts for the purpose of conversion of the assets of whom the assets were entrusted and of the third parties, either to be held or make them to do, withdraw, or destroy any document of right.
3. **Financial Statement Fraud** means adjusting accounting numbers by taking advantage of the accounting loopholes and other options in measuring and disclosing accounting data in order to change the information in the financial statements from what should be to what they want to be in the financial report.
4. **Corruption** means bribe giving irrespective of any forms whatever by offering, giving a covenant, promising to give, giving, demanding, or accepting money, properties or other benefits to government officials, government agencies, private sector, or those with duty, whether directly or indirectly in order to persuade such persons to act or omit to perform their duties. The purposes of giving bribe could be for inappropriately and unfairly acquiring or maintaining the business or any other benefits, self-interest or others, any acts in conflict with business ethics which cause damage on the benefits of others. Except in the case provided by law, regulation, notification, local tradition, or trade custom.

Bribery is the offering, giving or receiving gift, award, or any item of value to influence the actions of another person in charge to act or omit to perform his duty or for self-interest or to achieve what they want in a manner that is dishonest, illegal, and against business ethics of the Company.

Giving Assets or any other Benefits is a bribe given or offered in any form of privilege such as cash, property, items of value, gift, hospitality, touring, entertaining, or any others as a reward, persuasion, returns or building good relationship or any other which are considered corruption e.g., nepotism, giving internal information or wrongful assistance, collusion.

State Official means a person holding political position, a government official or a local officer holding a permanent position or salary, an officer of a person performing work in a State enterprise or a State agency, a local administrator and a member of a local council who is not a person holding political position, an official under the law on local administrative procedures, and shall include committee and a person or a group of persons who exercise power or entrusted to exercise State administrative power in the conduct of a particular act under the law.

Stakeholder means related person e.g., shareholder, employee, customer, trade partner, trade competitor, government sector, and other social entities e.g., local community.

Political Contribution means providing financial support, or other forms of support either direct or indirect for the purpose of supporting political activities e.g., lending money, giving item or service, advertising in support of political parties, donating money to participate in activities of the organization having close relationship with political parties in a manner that could induce unfair benefits.

"Facilitation Payment" means a small fee unofficially paid to government officials to ensure they will carry out according to the process or expedite the performance in which the process does not require the discretion of the government officials as it is the fundamental rights of juristic persons making the payment are legally entitled to receive such as requesting a license, certificate, and public services.

Personnel of the Company means director, executive and employee at every level of the Company.

Person relating to the Company means employee, representative, advisor or any person acts on the Company's behalf either with or without power of duty provided by policy.

Duties and Responsibilities

1. Company's Board of Directors approves the Anti-corruption Policy and supervises the implementation of the policy through an effective system supporting the anti-corruption practices. So as to ensure the management is fully aware and give priority to an anti-corruption which is instilled to become a corporate culture. The Board shall have the policy reviewed yearly.
2. Audit Committee reviews financial report, internal control, internal audit and risk management systems to be concise, up to date, and effective according to the international standards.
3. Risk Management Committee regularly assesses potential corruption risks of every process e.g., sale and marketing, procurement, contracts, human resources service, finance and accounting; finds solutions to eliminate or mitigate the impacts.
4. Executive Committee, vice president, executives shall have the responsibilities to institute the system to promote and support the Anti-corruption Policy and have the policy made known to all employees and concerned parties; to review the appropriateness of the systems and measures in compliance with changing business, regulations, articles of association, and legal requirements.
5. Corporate Governance Committee oversees, gives advices, monitors, examines, and reviews the compliance of work performance with the policy guidelines, regulations, and related laws to ensure the suitable and adequate control systems to manage corruption risk with subsequent report to the Board.

Anti-corruption Guidelines

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 dealing business with the Company neither for themselves nor others that may 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 contractor, sub-contractor, customer, business partner, or contracting party 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 neither solicit nor receive nor pay any form of bribery. Those who detects such actions shall report the Company immediately.

12. The Company articulates that the said policy shall be implemented by the subsidiaries companies, affiliate companies, or the Company's controlled companies including those associated in the business with the Company.
13. Directors, executives, and employees not binding to the policy are charged as malfeasance and shall be reported to the authority for legal proceedings.

Terms of Operations

1. This Anti-corruption Policy shall also apply to human resource processes, including nomination or selection, promotion, training, performance assessment, and remuneration. Supervisors at all levels shall communicate the policy to their line and staff personnel so that they can apply it to business activities within their scope of responsibilities and supervise the implementation according to the policy to ensure efficiency.
2. Any implementation of the Anti-corruption Policy shall be in compliance with guidelines set forth in the Corruption Risk Management Handbook, Code of Business Ethics and Work Performance Guidelines Handbook, Corporate Governance Handbook, stakeholder engagement policy and guidelines, as well as relevant rules and work performance handbooks, and additional guidelines to be formulated in the future.
3. To ensure clarity regarding activities involving high corruption risks, personnel of the Company shall perform with caution and comply with the Company's code of ethics and guidelines as follows:

3.1. Gift and Hospitality

Any offering or accepting of gifts and hospitality shall comply with the Company's Code of Business Ethics and Work Performance Guidelines.

3.2. Donation or Sponsorships

Any offering or accepting of donations or sponsorships shall be transparent and legal. It must be made certain that such donations or sponsorships shall not be used as a pretext for bribery.

3.3. Facilitation Payment

All facilitation payment to government employee is prohibited.

3.4. Political Contributions

- (1) The Company shall maintain political neutrality and shall not act in the interest of or provide financial or other support to political parties, political coalitions, political figures, or political candidates, either directly or indirectly, either at the local, regional, or national level.

- (2) Personnel of the Company shall strictly comply with the Company's code of conduct in relation to political action.

3.5. Revolving Door

The hiring of government employees who may create a conflict of interest or perform an unfair governance duty to benefit the Company is prohibited.

3.6. Business Relation and Procurement with the Government

Any offering or accepting of bribery is prohibited in all business activities. Dealing with the government shall be transparent, honest, and in compliance with relevant laws.

Communication and Training

1. The Company shall communicate and disseminate the Anti-corruption Policy to its personnel through various channels, such as orientation for new director and employee, training or seminar, internal public relations within the workplace, and electronic systems. The Company shall also periodically communicate to its personnel to be well perceive and according implementation on various forms of corruption, risks of being involved in corruption, and whistleblowing.
2. The Company shall communicate and disseminate the Anti-corruption Policy as well as the whistleblowing channels to the public, subsidiaries, and stakeholders via various channels, such as websites, annual reports, and annual registration forms, to foster an understanding and support anti-corruption efforts.
3. The Company's personnel who have any inquiries about this policy may consult their supervisors, Senior General Manager, the management/CFO, the Company's Secretary/ Deputy Senior Manager of Legal Department, or the Audit Committee.

Disciplinary Action

The Company's personnel who fail to comply with this policy are subject to disciplinary action and may also be subject to legal punishments if they commit an offense under the law.

Whistleblowing Measures and Channels

The Company has established mechanisms for whistleblowing, complaint handling, and processing violation cases against laws, rules, and the Company's code of conduct or any case in suspicious of corruption. The Company has also prescribed appropriate whistleblower protection measures according to the Whistleblowing Policy to provide a clear guideline and enhance the efficiency of complaint handling.

This Anti-corruption Policy has been revised according to resolution of the Board's Meeting on 11 August 2021 and effective on that date of resolution. In 2023, the Policy is reviewed and no revision is made.

Anti-corruption Plan and Targets (2018-2023) Throughout 2023, the Company has governed and carried out campaigns through communication and training sessions for all levels of its personnel including main suppliers as subcontractors to understand the said guidelines stipulated in the policy and Code of Business Ethics and Work Performance Guidelines Handbook.

The Compliance Unit is responsible for monitoring and assessing the compliance with laws, and the said measures. **In 2023, there was no report or wrongful act of corruption in relation to the Company.**

Receiving and Offering Gifts, Assets or Other Benefits

Gift, asset or other benefit can lead to corruption risk or embarrassment affecting decision making and posing negative impact on the Company.

In this regard, a set of guidelines for receiving and offering gifts, assets, or other benefits has been developed and prescribed in the Good Corporate Governance Handbook and Code of Business Ethics of the Siam Steel Service Center Public Company Limited for practices in compliance with the Company's Anti-corruption Policy.

Guidelines

1. Offer of Gifts, Souvenirs, or Other Benefits

- 1.1. Offering gifts or customary gifts on some special occasions is acceptable but must not contravene relevant laws. The gift value shall be in compliance with regulations and not extravagant. Personnel shall refrain from offering gifts if such offering would influence business decision making. On some occasions, offering gifts in the form that enhance image of the Company is acceptable.
 - 1.1.1. Calendars or diaries.
 - 1.1.2. Gifts that bear the Company's corporate logo/corporate brand.
 - 1.1.3. Products from projects under the royal initiatives, products from local communities nearby the Company's operating areas, or products intentionally made for charity of those that support sustainable development.
- 1.2. Giving gifts and souvenirs should be based on a single standard to avoid discrimination.
- 1.3. It is prohibited to offer gifts, souvenirs, assets, or other benefits to spouse, children, or those having acquaintance with government officials, customers, business partners, and those come into contact with. This will be considered receiving gifts via an intermediary.

- 1.4. It is prohibited to giving bribes or the likes to the Company's personnel or outsiders especially government officials to motivate misconduct.

2. Receiving Gifts, Souvenirs, or Other Benefits

- 2.1. Personnel of the Company shall avoid accepting gifts, souvenirs, or other benefits under any circumstances. In connection to this, they are required to inform outsiders about the Company's policy.
- 2.2. In the case whereby refusal to accept gifts, souvenirs, or other benefits is not appropriate while such gifts, souvenirs, or other benefits cannot be returned to the giver, the Company shall assign personnel to collect all the items received and donate them to persons or organizations outside the Company for charity or for the common good. Exceptions are made for the followings:
 - 2.2.1. Consumables should be at the discretion of direct executive overseeing department receiving the goods.
 - 2.2.2. Personnel are allowed to receive calendars or diaries made as a company's corporate gift for personal use.
 - 2.2.3. In the case of receiving item of value not exceed 3,000 Baht but not in alignment with local custom whereby refusal to accept gifts may induce dissatisfaction or negative impact on business relationship, such personnel shall inform their direct supervisor/executive for discretion and fill in the gift receiving form sent to Corporate Governance Department.
 - 2.2.4. If the supervisor/executive discretion is concluded not to accept the item received, such item shall be returned to the giver immediately. If the item cannot be returned to the giver, it shall belong to department receiving the item who is required to seek alternatives to manage the gift received such as charitable donation.
- 2.3. In any circumstance, the Company's personnel and families are prohibited to solicit or receive gifts, assets, or other benefits from customers, or those dealing business with the Company. This shall include any action inducing non-compliance with ethical or professional standards which may affect authorized decision making or induce conflicts of interest.

Personnel of the Company is required to comprehend and comply with good practice concerning receiving and offering gifts, assets, or other benefits. If in doubt or any information be required, contact the Compliance Unit of the Legal Department at Tel: 02 394 2897 or E-mail: hiran@ssscth.com.

Whistleblowing Policy

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.

Scope of the Policy

The policy is established to encourage employees to disclose information regarding violation of law, rule/regulation, and code of business ethics of the Company concerning to followings:

- Corruption;
- Fraud, misappropriation, theft;
- Fraud for the benefit of oneself or others;
- Harmful acts to health, safety, and environment;
- Intentional acts causing damage or loss to the Company;
- Obvious violation of business ethics;
- Fostering violation of law, rule/regulation, business ethics including concealing or helping to conceal such actions.

Safeguarding Confidential Information

The policy in this regard is established to assure employees or complainants that the Company takes all complaints seriously without any suffer on the employee or complainant who honestly files or reports the complaint. Information of employee or complainant is always confidentially kept. However, employee or complainant shall take cautions that right information is gathered before making complaints.

Channels for Lodging Complaints and Clues

- Independent Director, e-mail: id@ssscth.com
- Mr. Nawarat Chanamoon, Senior General Manager, Production Department/ CFO
e-mail: nawaratc@ssscth.com.
- Mr. Hirun Komolhirun, Manager Legal Department, and the Company Secretary,
E-mail: hiran@ssscth.com.
- By post to Legal Department, Siam Steel Service Center Plc., 51/3 Moo 2, Poochao Road, Bangyaprak District, Amphur Phrapradang, Samutprakarn 10130.

3.4 Shareholders

The Company attaches importance to the rules and regulations of the SET and Office of the SEC, and other related laws in signifying the rights of stakeholders.

- The Company operates its business with transparency, commitment to growth and advancement, and continual and long run good returns of investment to shareholders.
- All duties are performed with honesty, integrity, fairness, with concerns of major and minor shareholders for the best returns to all related groups.
- The Company maintains and safeguards all assets to prevent them from lost, damage or waste.
- The Company earnestly and constantly discloses adequate, transparent, reliable, and timely information of financial report and other matters concerning business and performances of the Company.

3.5 Employees

The Company regards every employee as valuable asset and significant factor driving the business to attain its goals. For all employees to be competent and happy at work which adversely affect the continuing development of the Company. In this regard, the policies and guidelines in relation to employees are defined and stipulated.

1. Policy on Compensation and Welfare

- Fair recruitment that is lawful and comply with rules and regulations under labor law (e.g., employment, termination of employment), welfare, and equal treatment of employees.
- Provision of opportunity for all employees to maximize their talents with fair and appropriate competency-based remuneration.
- Regular performance and career advancement assessment by which the results are used as inputs for development and improvement of work processes. The development and improvement are in line with vision, strategy map, key performance indicators, objective, target, as well as short- and long-term action plans that lead to sustainable growth of the Company and attainable returns for employees.
- Policy for fair compensation to employees is based on short - long term performances of the Company; expertise, knowledge, competence, experiences, position, responsibility, and work performance of individual employee; performance of the Company; and socio-economic circumstances.
- Policy on fair compensation and equal opportunity; no privilege or deprivation of rights of employees against race, nationality, tribe, skin color, class, religious,

social status, gender, age, disability or handicapped, political ideology, marital status; measures on protection from and solution for sexual abuse.

- The compensation is paid based on the KPI as defined by each employee and incorporated in the Action Plan submitted to their respective line of command.
- The long-term compensation is paid in the form of provident fund.
- Appointing, transferring, rewarding, and punishment are carried out in good faith based on knowledge, competency, suitability, fairness, and impartiality.
- Benchmarking the benefits and welfares given to employees with other firms in the same or similar industry and in accordance with applicable laws e.g., medical expenses, monthly/yearly diligent allowance, uniform cloth, shuttle, financial assistance, etc.
- Personnel development is continuously and constantly promoted to enhance knowledge, skill, and potential of all employees beneficial to their career advancement.
- Safe and healthy work environment for life and property of employees are regularly maintained.
- Proper facilities and welfare for employees with disability are provided.
- Employees are encouraged and fostered to live better life qualities and self-reliance following sufficiency economy guidance.
- The Board establishes clear policy and guidelines to promote learning and training for employees concerning environment, conservation, energy saving, safety and health in the workplace.
- Employees' participation and association rights are promoted and respected concerning comments or recommendations in relation to operational guidelines and/or work agreement. This shall be beneficial to all as well as create good relationship and collaboration. Channels to receive complaints and clues are available including fact finding guidelines and whistleblower protective measures.
- Work culture and norm toward good cooperation and unity in the organization are promoted.
- Business operation is managed with deliberation to avoid any unfair action that might cause negative impact on job stability of employees.

2. Policy on Management System of Quality of Work Life

- Appropriately and continuously implements and develops Management System of Quality of Work Life according to 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 in various dimensions for according mitigation and/or prevention measures.
- Develops human resources to become valuable assets of the organization.
- Ensures regular performance assessment according to the policies.

3. Policy on 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 and improvement shall continuously be conducted including other related activities to prevent any accident in the workplace. Key Performance Indicator-KPI shall be identified for every employee to Completely Check Completely Find out - CCCF. In connection to this, every employee shall observe and look for any danger incurred from his/her work operations (CCCF for factory =2 items/person/year, for office = 1 item/person/year). Whereas KPI of every unit/department shall be at zero accident.
- Campaign shall be conducted to promote of life quality and good health for employees.
- The Company shall support sufficient and suitable resources to bolster compliance with standards and practice concerning occupational safety, health and environment in the workplace
- The Company welcomes delegations paying study visit to observe safety, occupational health, and working environment as well as disseminates related information in this regard to public and concerned parties.

4. Policy on Industrial Sufficiency Economy (TIS 9999)

The Company has applied, to its business management and operations, the principles of Sufficiency Economy: the Moderation, Reasonableness and Self-immunity. In this regard, personnel shall possess knowledge and virtue promoting development that balances social, economic, and cultural aspects so as to sustain growth, stability, happiness, ability to take on all internal and external changes as well as environmental uncertainties. Implementation in respect to this includes:

- Encouraging employees' participation through instilling awareness of learning with morality in order to live life that 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 so as to uplift the spirit, living and interdependence.

5. Policy on Environmental Management

So as to exhibit its commitment to future environment, the Company's management articulates the policy on Environmental Conservation and Rehabilitation dedicating to social and environment. Actions in this regard are within the frameworks of Environmental Management System ISO 14001 to prevent the continuing exploitation of environment, and to cooperate with other organizations. The policy was revised in 2020 as followings:

- Implements according to the objectives, context, nature, size of the Company's activities, products and services on environment;
- Commits to protection of environment, prevention and control of pollution;
- Ensures the practice is in accordance with the mission and regulations in relation to environmental management;
- Emphasizes and promotes the participation in pollution reduction, resource conservation and environmental protection;
- Develops and improves environmentally friendly manufacturing process;
- Continuously assesses, reviews and revises according to the set objectives and goals.

3.6 Community and Society

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

1. Environment and Corporate Social Responsibility for Sustainability

The Company is committed to conduct its business with social and environmental responsibilities for sustainable development with clear operational guidelines. The Company, therefore, articulates the Corporate Social Responsibility and Environment for Sustainable Development Policy as follows:

- The Company strives to conduct its business recognizing Environmental, Social, Governance (ESG) as well as promoting effective management that is transparent, auditable, fighting against all forms of corruption, respecting for human rights, and caring for all sectors of stakeholders;
- The Company continuously strives to improve quality of work life; environment management; management of occupational safety, health and environment of the workplace in compliance with relevant laws, rules/regulations and international practices. The Company attaches its business practices to various standard systems including MS-QWL, ISO 14001, ISO 45001, ISO 9001, IATF 16949, ISO 5001 and ISO 56002; related laws and legal requirements or international standards; and the Industrial Standard Following Sufficiency Economy in Industrial Sector (TIS 9999). Such standard systems have been integrated and applied inside and outside the organization toward achieving sustainable development goals (SDGs);
- Promotes the integration of vision, mission, and goal as well as work practices for sustainable business operation;
- Ensures the presence of strategies, work practices and operating results are effectively and efficiently responsive to organization challenges;
- Promotes analytic study of causes, driving forces, risks, and possible opportunities contributing to sustainability;
- Reviews and assesses sustainable social environmental business development goals and plans, at least once a year.

2. Policy on Energy Conservation

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 key objective is to promote employees' awareness of effective and efficient use of energy as well as to constantly and sustainably lower energy costs. The Company, therefore, improves its energy management system by:

- Appointing the energy management working group comprising representatives from various units within the organization;
- Preliminary reviewing energy management;
- Articulating energy conservation policy;
- Assessing capacity on energy conservation;
- Setting targets and action plan for energy conservation, and reviewing and analyzing the implementation accordingly;
- Implementing energy conservation plan, reviewing and analyzing operations against the set targets and plans;
- Monitoring and assessing energy management;
- Reviewing, analyzing and revising energy management plan and targets.

In 2023, the company has commitment to continual improvement in energy management in accordance with Thai laws and the international standard ISO50001 and continuously received ISO50001 certification for its energy management standard.

The Policy on Energy Conservation is revised and enacted on 29 August 2023 to serve as an implementation guideline for energy conversation. Implementations under the Policy encompasses continuous training of energy conservation to the management and responsible employees, and activities to raise energy savings awareness of employees of all levels. Accordingly, the company can continuously save energy throughout the organization.

Policy guidelines are articulated for energy conservation of the Company.

- The Company determines energy conservation as part of its operation through development for proper energy management system in line with related laws and regulations.
- The annual energy conservation plan and targets shall be formulated and made known to every employee for common understanding and actions.
- The Company shall support the purchase of energy saving products and services designed for energy capacity improvement.
- The Company shall continuously improve technology and energy consumption for effective and proper use in the business.

- The Company regards energy conservation as duty and obligation of executives and employees to cooperate and comply with the stipulated measures.
- The Company shall promote and provide resources as needed including personnel, budget, work hours, training, awareness instillation, idea sharing of employees for efficient development of energy related work operations.
- The energy conservation plan and targets shall be revised every year by executives and the Working Group.

All personnel cooperate and act actively in compliance with the policy and mission statement that says:

“Safety First, Satisfaction, Social Care, Continual Improvement”

As results of good relationship of the Company’s executives and employees with surrounding communities, the Company has received the certificates as follows:

- Standard for Corporate Social Responsibility (CSR-DIW) from the Department of Industrial Works and has been certified Green Industry recognizing the Company’s systematic environmental management, and monitoring, evaluation and review for continuous development;
- Standard on Workplace Prevention and Solution of Drugs related Problems from the Department of Labor Protection and Welfare;
- Safety Standard ISO 45001
- Quality Management Standard ISO 9001 and IATF 16949;
- Environmental Management Standard ISO 14001;
- Energy Management Standard ISO 50001;
- Certificate of Standard on Workplace Prevention and Solution of Drugs.

3. Policy on Sustainable Procurement

In an effort to ensure that the Company’s procurement system is efficient and productive with transparent, fair, and accountable process which will lead to the Company’s sustainable growth and confidence for all groups of stakeholders, and the employee works along the same procurement guidelines, in 2023, the Company revised and formulated its policy on sustainable procurement as follows:

1. Procure products by considering their value for money, efficiency and effectiveness in terms of quality, price, quantity, punctuality in products delivery, environment friendly aspect, service, and responsibility of environmental, social, and governance.
2. Procure products focusing on ethical business by providing customers with clear and accurate information, fair business treatment as well as welcoming customers’ ideas and suggestions.

3. Procure products with integrity, transparency, and accountability in strict compliance with related laws, and regulations as well as consider measures of anti-corruption, good risk management and internal control.
4. Provide sustainable procurement and management to business partners taking into account environmental impacts; environmental, social and governance (ESG) as well as supervise their operations to be in accordance with the Company's guideline for business partner which is part of sustainable supply chain management.
5. Support and promote knowledge and skill development of business partners to jointly reach sustainable growth in business.
6. Select suppliers or service providers with certified environmental standard along with giving first priority for fair labor in accordance with human rights principles.
7. Promote environmentally friendly procurement and support of products made from renewable resources; or products certified by Thai Industrial Standards (TIS) which do not cause environmental pollution such as global green tag products etc., including help to reduce green grass effect and raising awareness of occupational health and safety.
8. Manage the Company's knowledge and push for harnessing technology to develop procurement potential aiming for the Company's excellence.

In this regard, the executives and employees of the company has to support, encourage and strictly act as defined in the policy, and procurement management framework.

Section 4 Disclosure of Information and Transparency

To ensure the important information of the Company including financial status, performances, ownership, and corporate governance process are disclosed as accurate, adequate, timely, and transparent; accordingly, the following guidelines for practices are instituted by the Board.

- The disclosure of Company's important information including financial and non-financial e.g., market shares, customers' satisfaction, shall be accurate, adequate, timely, transparent, and conformed to the notifications of concerned government offices.
- The Company regularly reports, in Thai and English, important data and information using Form 56-1 and annual report, to shareholders and general investors via various channels e.g., electronic media (SET Community Portal – SCP), website of the SET (<http://www.set.or.th>), and the Company's website at www.ssscth.com.
- Not only disseminating the Company's Good Corporate Governance Policy on the Company's website, but also the Company's memorandum, certified letter, and the Company's articles of association.
- The Company establishes Audit Committee comprising 4 independent directors not being executives, to oversee the quality of financial report and internal control system.

- There shall be the disclosure of roles and duties of the Board and of the Audit Committee, number of meetings held, and number of meetings attended over the previous year of each director/committee member as well as opinions on the execution of duties.
- There shall be the disclosure of securities holdings of the directors and executives, and to institute the policy binding directors and executives to report the followings:
 1. Sale-purchase of Company's shares/securities holdings;
 2. Connected transaction and report of stakeholding of directors and executives.
- In order to avoid potential conflict of interest, directors and executives are required to report to the Chairman of the Board and present such report at every quarterly Board's meeting for acknowledgment.
- Any sale-purchase of the Company's shares, the directors and top executives shall report to the Board at least 1 day before the day of selling or purchasing.

Use of Inside Information

Policy on Confidentiality, Safeguarding and Use of Inside Information

The Company's Board is committed to conduct business in manner that is honest, transparent, fair, and impartial to all stakeholders. The policy to safeguard confidential information from leaking to irrelevant persons is in place especially information that may affect the Company and its stakeholders. Directors, executives, and employees must not use information of the Company for self-interest.

This has been in alignment with Code of Ethics for Confidentiality, Safeguarding and Use of Inside Information illustrated in the revised the Code of Business Ethics and Work Performance Guidelines Handbook 2023 as approved by the resolution of the meeting of the Company's Board and Corporate Governance Committee on 25 February 2023.

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 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 is 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. Besides the disclosed information to the public, the Company assumes that all information is only for internal use. Directors, executives and employees must use such information within their scope of assigned duties and responsibility.
10. 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.
11. 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.

Policy and Guidelines for Safeguarding Personal Data

The Company's Board gives an utmost importance and respect for the privacy of customers, shareholders, business partners and persons related to the Company's business and will appropriately keep and safeguard the data from being misused in agreement with Thailand's Personal Data Protection Act. This is to provide safe business transaction with the Company and no damage caused to the data subject by illegal data misuse for personal benefits.

Scope

This policy and guidelines for safeguarding personal data applies to the Company, employees of the Company and its subsidiary and/or companies related to the Company.

Definition

Personal Data means the data that enable us to specify the identity of an individual person directly or indirectly such as names, family name, e-mail, telephone number, address, picture, race, religion, political viewpoint, genetic and biometric data.

Data Subject means any individual person who can be identified, directly or indirectly.

Data Source means the source from where personal data of its owner is obtained:

- Business transaction; form filling; praise and complaint; inquiry via website, application, telephone, e-mail; direct contact and/or any other means.
- Participation of business activity, event, and/or others
- Service via website, application or provider of E-Commerce
- Personal data collected from public, business, commercial, social media sources regardless of whether the disclosure is by consent from data owner or by consent given to someone from such owner.
- Personal data collected from third party such as family member, contact person in case of emergency, beneficiary, work guarantor, recruitment website/ office, reference person, government agency, educational institution, depository institution, bank or financial institutions regardless of whether the disclosure is by the consent from data owner or by consent given to someone from such owner.
- Delivery of supporting documents for business contracts. or employment contract with the company.
- Delivery of supporting documents for recruitment.
- Recording of still images or moving images by closed circuit cameras (CCTV) within the controlled areas of the Company
- Visiting the Company's website intentionally or not

Data Protection Officer: DPO is a person appointed for giving advice, inspecting, and supervising data controller involved in the processing of personal data in accordance with personal data protection laws.

Data Controller is a person or juristic person whose duty and authority are to make decisions regarding the collection, use, or disclosure of personal data.

Data Processor is a person, or juristic person who collects, keeps, use or disclose personal data by the order of or on the behalf of data controller. Data processor must not be the same person as data controller.

The Company means Siam Steel Service Center Public Company Limited, its subsidiaries as stated in the Company's financial statement.

Responsibilities**1. Executives**

To supervise that the Company's operation is in compliance with set policies and guidelines as well as to increase the operation's effectiveness.

2. Data Protection Officer: DPO

- 2.1 To investigate that all departments of the Company operate in accordance with the system, related law and the Company's policy regarding personal data protection.
- 2.2 To give advices on personal data protection system and its improvement of practices to be up-to-date and conforming to related laws.
- 2.3 To report to the executives of operations regarding personal data protection and suggest for activities in order to raise awareness of the importance of personal data protection and how to accurately act in accordance with the Company's guidelines.

3. Employees

- 3.1 To carefully use personal data and strictly follow the Company's work procedures, work instructions, policies, guidelines and other related document involving personal data protection.
- 3.2 To inform data protection officer (DPO) at once of any incidents of personal data violation and/or any leakages of the data.

Guidelines

1. Personal Data Collection and Safeguarding

- 1.1 The Company collects personal data only as necessary with fairness and caution in compliance with related laws and the Company's missions. The Company will directly inform the data's owners of the collection's purpose and seek their consents unless the law permits to collect without the consent of the data owners.
- 1.2 If it is required for a collection of sensitive personal data such as ethnicity, political opinions, religious beliefs, illness record, criminal history which might affect the data owner, the Company will clearly inform and seek consent from the data owner in a careful and secret handling of the data.
- 1.3 The Company will update personal data to make it accurate and present by updating the related data base once a year and requires the data owner to report for inaccurate personal data to be corrected.
- 1.4 The Company formulates measures for personal data protection to safeguard damages, corrections, data accessing without owners' consent and data leakage.

The Company sets up both technical and administrative measure for personal data protection as well as reviewing of such measures particularly when an interruption of processing technology occurs so as to maintain the effectiveness of the data protection as required by the Company's mission.

- 1.5 The company arranges for a record of personal data that is accessible or verifiable by its owner and establishes guidelines for reporting data violation incidents to the data protection officer and data owner once the violations are discovered.

2. Usage and Disposure of Personal Data

- 2.1 The Company uses or discloses personal data for its purposes as agreed by the data owner. In the event of data is disclosed to the third party, the Company will supervise to ensure that the data serve the notified purposes except for the disclosure as specified by related laws.
- 2.2 Sending personal data collected by the Company to foreign countries can be done if the data receiver has an adequate protection. If not, but due to the necessity of the data, the Company will notify and ask the data owner for consent before such action.
- 2.3 The Company will transfer personal data in preventing or suppressing danger to the life or health of a person, if the data owner is incapable of giving consent.

3. Personal Data Destruction

- 3.1 The Company will destroy personal data when the intended use period has expired or when the data owner objects or withdraws consent except that when the data retention complies with related laws.
- 3.2 The Company will set up safe way to destruct and delete personal data from the system to prevent data leakage.

4. Rights of the Owner of Personal Data

The company respects the rights of personal data ownership. Data owners still have every right to their personal data covering accessing data, requesting a copy, requesting to send or transfer information, objecting the processing, requesting disclosure of the source of data, correction to update data, suspending data usage, deleting data, or data destruction including the rights to complain when the data usage is not in accordance with specified purpose.

5. Whistleblower and Penalties

- 5.1 In case that doubt arises from action that may violate measures, regulations, laws, policies and guidelines for personal data protection, the company specifies that it is possible to seek recommendations from the data controller before any action taken.
- 5.2 The company sets up complaint or reporting channels when someone witnesses an action believed to be a violation of personal data protection policies and practices. The identity of complainants or whistleblowers will be protected and kept secret and this will not affect their work and position both during and after the investigation process.
- 5.3 In the event of an investigation, all employees must cooperate fully with related internal and external agencies. If executives or employees directly or indirectly violates or fails to comply with the Company's personal data protection policies and practices, disciplinary actions will be considered according to related regulations.

Contact

Siam Steel Service Center Public Company Limited, 51/3 Moo 2 Poochaosamingprai Road, Bangyaprak, Samutprakarn 10130, Tel.02-385-9254-56 Ext. 138 –139, Email: dpo@ssscth.com

Securities Trading Policy of Directors, Executives and Employees

So as to ensure securities trading of directors, executives, and employees are carried out in a transparent manner and under good corporate governance principles; the Company's Board has prepared and put in place the Securities Trading Policy of Directors, Executives and Employees (Trading Policy) as guidelines for practices.

Scope

This Policy shall be enforced on directors, executives, employees and any other designated persons as specified by the Company including spouses or cohabitating persons, minor children or adopted children of such person. This policy shall cover trading of the Company's securities which are registered in the Stock exchange of Thailand.

Definition

Any statement or wording being used in this policy shall have the following meanings unless such statement is being displayed or explained in other contexts.

- (1) "Securities" means shares (common and preferred), debentures, stock options, derivatives (e.g. futures and options), warrants and any other financial instruments which is eligible for trading, transferring, accepting transfer and/or exchanging in the financial market.
- (2) "Trading" means purchase, sell, transfer or accept transfer of any benefits under the law including exercise the rights under stock options or warrants.
- (3) "Inside Information" means any material facts, which could influence any changes in securities prices, and is not being disclosed to the public. Examples of Inside Information are, for instance:
 - a) Financial status and operating results of the Company;
 - b) Business plans including strategic plan, marketing plan, and fundraising plan;
 - c) Joint venture, merger & acquisition, acquisition of business and/or material assets;
 - d) Announcement of payment or non-payment of dividend or announcement of profit or losses;
 - e) Changes in par value;
 - f) Acquisition or loss of material commercial contracts;
 - g) Launching of key new products;
 - h) Changes to controlling power or material changes to the Board of Directors and executives;
 - i) Redemption of securities;
 - j) Taking out significant amount of loan which has material impact to financial status and operating results;
 - k) Issuance of right offerings in significant amount by offer for sale to the public or specific persons;

- l) Material legal disputes;
 - m) Acquisition or disposal of material assets;
 - n) Significant changes to investment capital;
 - o) Amendment to the Company's objectives;
 - p) Tender of other listed company's securities;
 - q) Material changes to accounting policy.
- (4) "Executive" means executive as defined by the Capital Market Supervisory Board TorChor 23/2551 shall mean the manager or the next four executives succeeding the manager, the persons holding equivalent position to the fourth executive and shall include the persons holding the position of manager or equivalent in accounting or finance departments. Such persons shall be entrusted by the Company's Board with responsibility for the management of the Company.
- (5) "Designated Person" means an employee holding a position, or having a duty that permits them to retrieve or possess the inside information of the Company (including spouses or cohabitating persons and minor children or adopted children).
- 1) Directors.
 - 2) Top four executives or equivalent.
 - 3) Executives and employees of the key units of the Company including but not limited to finance and accounting, business development, investor relations, internal audit, risk management, and Company's Secretary.
 - 4) Any persons who participated in the Board's meeting and/or committee's meetings, which engage in discussion or negotiation about the financial and inside information of the Company and its subsidiaries.
 - 5) Other persons as designated by the Board.

The Company's Secretary is responsible for keeping the name list of the designated persons and informing any person being added in/deleted from the list.

Duties and Responsibilities

1. Board of Director shall supervise this policy so as to ensure every director, executive, employee, and any other as designated by the Company are in compliance with the specified requirements and practice guidelines concerning trading of Company's securities.
2. The Company's Secretary has a duty to enforce and implement this policy including conduct a follow-up on the efficiency of this policy as well as clarifying any issues, responding to questions and providing interpretation in case of doubts.
3. All executives have duties to ensure that their subordinates recognize the importance, understand and abide by this policy.

4. All directors, executives, employees, any others as designated by the Company shall strictly comply with this policy concerning trading the Company's securities. They shall also communicate to their spouses, cohabitating persons, and minor children or adopted children to acknowledge and comply with this policy.

Policy and Guidelines

1) Prohibition on Using Inside Information to Trade Securities

All directors, executives, employees, any others as designated by the Company shall comply with the requirements concerning prohibitions to use inside information to trade securities which is prescribed under Section 242 of the Securities and Exchange Act B.E. 2535 that "Any persons, who are aware or possess any inside information related to issuer, are prohibited to undertake the followings:

- (1) Purchase or sell securities or enter into futures contract related to securities whether for themselves or others.
- (2) Discloses any inside information to third parties, whether directly or indirectly, or by any other means provided that such person is aware or should be aware that the recipient may use such information to purchase or sell securities or enter into contract to purchase or sell relating to securities, whether for themselves or others, except such person is acting in the manner deemed as not taking advantage of others or in the manner specified by the Notification of the Securities and Exchange Commission."

2) Blackout Period

- (1) Designated persons are prohibited from trading Company's securities within the period of 30 days prior to the disclosure of quarterly and annual financial statements and during the period as specified by the Company. They are allowed to trade the securities at least 24 hours after the disclosure of such information.
- (2) In special circumstances, designated person may sell Company's securities during the blackout period if being in critical situations, for instance, serious financial difficulties or compliance with legal requirements or subject to court's orders provided that such designated persons shall prepare a written memo stating reasons for approval from the following persons:
 - (1) Chairman of the Board of Directors (in case the seller is the director, executive, or Company's Secretary);
 - (2) Chairman of the Audit Committee (in case the seller is the Chairman of the Board of Directors);
 - (3) Chairman of the management (in case the seller is a designated person).A copy of the record of such a request must also be sent to the company secretary.

- (3) The Company's Secretary shall announce the blackout period in advance along with annual meeting date. In this regard, advance notice shall be provided before the blackout period of each quarter. This is to ensure the designated persons have known about the Company's blackout period and act accordingly.

3) Reporting of Securities Holdings

- (1) For the first-time reporting, directors and the top 4 executives or equivalent shall prepare and submit the report of their securities holdings (including securities holdings of their spouse, cohabitating persons, minor children or adopted children, and juristic person in which such persons are joint shareholders with the holdings exceeding 30%) via the electronic filing system of the SEC within 7 working days from the date of purchasing, selling or transferring the securities under the Securities and Exchange Act B.E. 2535 (Section 59).
- (2) Reporting on changes to securities holdings, directors and the top 4 executives shall prepare and report such changes of themselves (including the changes to securities holdings of their spouses, cohabitating persons, minor children or adopted children, and juristic person in which such persons are joint shareholders with the holdings exceeding 30%) via the electronic filing system of the SEC within 3 working days from the date of purchasing, selling or transferring the securities under the Securities and Exchange Act B.E. 2535 (Section 59)

Trading Exemptions

Reporting on changes to securities holding is not required in the following circumstances:

- (1) Rights offering;
- (2) The exercise of the conversion rights of the convertible bonds;
- (3) Accepting the tender offer of stocks or exercising stock option warrants which are obtained under the Employee Stock Option Program "ESOP", or the Employee Joint Investment Program EJIP;
- (4) Inheritance;
- (5) Transferring and receiving of securities from placing as collateral for futures contracts.

In Case of Doubts

If any director, executive or employee has any questions or doubts regarding this policy or is unclear whether or not the inside information which is material or has been disclosed to the public or whether such securities are eligible for trading under certain circumstances, such person may consult the Company's Secretary prior to taking any action.

Violation of Policy and Related Laws

Any director, executive or employee who violates this policy shall face disciplinary action. This may include civil and criminal liabilities.

Pursuant to Securities and Exchange Act B.E. 2535 (Section 275) providing that “Any person who has the duty to prepare and disclose the reports under Section 59 contravenes or fails to comply with Section 59 or the rules or procedures as prescribed thereunder shall be liable to a fine not exceeding THB 500,000 (five hundred thousand baht) and a further fine not exceeding THB 10,000 (ten thousand baht) for everyday during which the contravention continues.”

This Securities Trading Policy was considered and approved by the Board of Directors on 28 August 2023.

Section 5. Responsibilities of the Board of Directors

The Company’s Board of Directors consists of those well-versed and experienced with competent in vision and strategy formulation, be able to devote time and perform duties with full dedication to the Company. The Board governs business operation via the management team and committees recruited and assigned for particular matters. The Board also provides efficient systems to monitor and evaluate the management performances.

The Company’s Board Diversity Policy

The Company recognizes and embraces the benefit of having diverse Board to create equilibrium of thought and performance quality, effective decision making of the Board to further benefit the Company’s business performances. The Company’s Board diversity aims at:

1. Promoting discussion at the Board’s meeting;
2. Promoting creative thinking of the Board’s directors beneficial to the Company;
3. Enhancing effective performance of the Board;
4. Applying for recruitment to diversify the Board of Directors.

The Company specifies the Board’s composition to include and make good use of persons with differences in knowledge, skills, experiences, and background in alliance with business strategies and operations. Such persons shall possess personal virtue, good attitude of the Company, broad perspective, leadership; be dedicated, impartial; nondiscriminatory against origin of birth, race, gender, age, skin color, religious, family status, educational background, or other statuses irrelevant to work operation, professional skills, and expertise.

The Company also specifies the Board Skill Matrix in 13 areas for the recruitment of directors of the Board:

1. Business and Management;
2. Direct and Indirect Industrial Corporation;
3. Engineering and Civil Engineering;
4. Strategic Planning for Competitive Advantage;

5. Business Related Laws;
6. Accounting and Auditing;
7. Economics;
8. Finance and Investment Management;
9. International Marketing;
10. Information and Digital Technology;
11. Risk and Crisis Management;
12. Good Corporate Governance;
13. Environmental, social, and governance (ESG)

The said Board Diversity Policy is instituted to maintain the best interests of the Company with transparency and to building trust among employees, customers, shareholders, stakeholders, society, and domestic and international investors.

Nomination of Directors and Chief Executive Officer

Nomination of Directors

The Company's Board designates the Nomination and Remuneration Committee to set forth the criteria and policy for recruitment of directors, committee members, taking into the determination an appropriate number to be recruited, structure and composition of the Board/committees, and qualifications. With respect to the selection process, high priority is given to the competent nominees with knowledge, competent, experiences, board diversity, high work profile, leadership skills, broad vision, integrity, positive attitude to the organization, and be able to dedicate time to act in the Company's best interest and transparency.

The Nomination and Remuneration Committee selects and nominates, qualified person to fill the terminated or vacated or new director position, taking into determination skills being required by the Board and criteria set by the Company. The nomination is proposed to the Company's Board and/or shareholder meeting as the case may be. In this regard, details suffice to decision making shall be provided for the Board and shareholders.

Nomination Policy and Criteria for Director of the Board

The Nomination and Remuneration Committee nominates qualified knowledgeable person as required by the Company, applicable laws, and governing bodies to replace either retiring director or director being retired by termination of terms of office or by other means. The determination takes into account knowledge, diversity of experiences relating to e.g., financial, management, strategic, legal, investment aspects. Qualified person shall also possess skills and expertise relating to business nature of the Company including leadership, ability to express idea, rational decision making, be ethical with clean and high work profile. This is to ensure the strength and diversity of the Board capable of driving the Company toward business goals through international accepted good corporate governance.

Nomination and Election of Director of the Company's Board

The nomination or selection of director of the Company's Board, the Nomination and Remuneration Committee shall take the following criteria into consideration.

1. Determining appropriate number, composition, and diversity of Board structure compared to nature and size of the business. Board Skill Matrix is drawn to demonstrate qualifications as required taking into conditions the qualifications being needed by the Board in alliance with business operation strategies.
2. Nominee either from within or outside the Company shall be executive possessing qualifications as required. Nominated person can be either a person selected from the data base of IOD Chartered Director or qualified person nominated by shareholders at the AGM. Shareholders are informed of the nomination information via the SET and the Company's website in advance.
3. The Nomination and Remuneration Committee approaches a qualified person, conducts interview, and consults with such person to seek confirmation for director position once approval is granted by the Board or the AGM as the case may be.
4. The Nomination and Remuneration Committee nominates individual person passing selection criteria to the Board for appointment or concurrence prior to submitting to shareholders' meeting for appointment.
5. Follow -up director appointment process according to the Company's articles of association.

Election of the Audit Committee/Independent Directors

The Board of Directors and/or the shareholder meeting elects Audit Committee/independent director among persons with qualifications according to the Notification of the SET. One-third, and no less than 3 persons of all members of the Committee shall be independent committee members. The Committee must have at least 3 Audit Committee members all of whom are independent committee members. At least 1 Audit Committee member shall possess knowledge and experiences suffice for reviewing the reliability of financial statements. The Audit Committee shall be in service for 2 year per term as from the date appointed. Once the term of appointment is expired, the Audit Committee member is eligible for re-appointment. The current Audit Committee /independent director comprises 4 members.

Succession Plan

The Board sets up a succession plan for the management and line positions taking into determination the performances and potential of each individual.

The employee performance assessment applies the Management by Objective model. Employee key performance index (KPI) are cascaded from the Company's KPI to allow employees to realize the importance of self-defined work targets. Such targets serve as criteria for performance and competency assessment. The assessment results are subsequently used to justify the compensation and career advancement planning.

Pre-promotion programs are in place for the development of potential persons to acquire skills and competencies required for any key position when needed e.g., President of the Company, Vice President, and executive so as to strengthen the continuity of management and performance of the Company.

Succession Policy

The Company assures the selection of personnel to fill key positions is appropriate and transparent to ensure professionalism. The Nomination and Remuneration Committee is entrusted with formulating the succession plan for the positions of President, Vice-president, and executives for submission to the Board for consideration and appointment.

The Nomination and Remuneration Committee monitors and evaluates the succession plan on the following positions.

1. Recruitment Criteria for the Positions of President or CEO/Vice President

To fill the positions of the Company's President and Vice-president either when the position is vacant or the person in the position is unable to perform duties, executive of the similar level or deputy to the vacant position shall perform as Acting President or Vice-president as the case may be. The acting shall remain until the recruitment and selection of qualified person according to the criteria set by the Company is done. The selected person shall possess qualifications of broad vision, be competent with experiences suitable for corporate culture. The Nomination and Remuneration Committee is responsible for selection process and submission the selection result to the Company's Board for consideration and approval.

In connection to this, the Nomination and Remuneration Committee taking into determination the following criteria:

- Being director according to the Company's Articles of Association;
- Possession of knowledge, business management competencies, skills, experiences, a wide range of profession, and specifications most needed and beneficial to the Company's business.
- Possession of direct and indirect experiences of related business industries and organization management;
- Experiences in corporate leadership;
- Be approved by the Board;
- Be able to deal with conflicts of interest.

Qualifications of the President or CEO

The President or CEO of the Company shall possess qualifications of the Board of Directors as mentioned in para. 5.1, as well as the following specifications:

- 1) Characteristic;
 - Integrity and accountability,
 - Informed judgment,
 - Leadership maturity and stability, be a good listener, take on challenges with appropriate independence,
 - Commitment to working principles,
- 2) Knowledge and competency of business operations; a wide range of professional skills, experiences, and other specifications most needed and beneficial to the corporate business,
- 3) Qualifications as specified by the SEC and SET,

- 4) Experiences in business of metal fabrication and parts manufacturing used in various industries, management of organizational capacity buildings to enhance effective business operation and competitiveness for the Company,
- 5) Excellent leadership skills, and a broad vision,
- 6) High competent in strategic planning and organization management,
- 7) Professional in personnel management, be able to motivate individuals to fully use their own potential,
- 8) Soft skills for work,
- 9) Wide range of professions, finance, IT etc.,
- 10) Well recognized by peer companies.

2. Executive

When the executive position is vacant or person in the position cannot perform duties, the Company shall nominate the selected successor to the Board. Process of succession plan formulation is as follows:

- 1) Situation analysis of the Company concerning strategy, policy, investment and expansion plans.
- 2) Manpower availability and compatibility assessment against the Company's short- and long-term strategies.
- 3) Manpower plan formulation for development and recruitment of employee to replace the retiring personnel.
- 4) Recruitment plan formulation and provision of training prior to retirement or early retirement.
- 5) Competency description illustrating required knowledge, skills, personality, and attitude for certain positions, and individual development plan (IDP) formulation.
- 6) Selection, competency-based performance assessment.
- 7) Personal testing and evaluation tools for potential analysis.
- 8) Successor identification based on potential and performance assessment whom shall be notified in advance so as to prepare for the assignment and job learn, reserved person for the position is also identified just in case.
- 9) Personnel development and performance appraisal of potential successor to ensure expected performance is fulfilled or else recruit the reserved person into the position.

Development of Directors and Executives

The Board recognizes an important of being a knowledgeable director with full understanding of respective duties, responsibilities, and the Company's business characteristics. Therefore, trainings are provided continuously and constantly to the newly appointed directors and the existing ones, coupled with the dissemination of rules, regulations, and guidelines provided by the SET and Office of the SEC as well as applicable laws and principles to facilitate the execution of director and executive functions.

(1) Orientation of New Director

The Company's orientation policy aims at providing training for every new director to be well equipped with knowledge and understanding of the Company's business nature and operations. The training contents are inclusive of business policies and characteristics, business overview, and performances.

The orientation provides essential information for director including:

- 1) Matters binding the Company to act according to the applicable laws e.g., sale-purchase of Company's shares, personal stake and the holdings of spouse and next of kin being major shareholders, managing directors of other businesses, and relationship with the companies;
- 2) Memorandum and Articles of Association;
- 3) Scope of duties and responsibilities of the Board and committees;
- 4) Minutes of the meetings and meeting schedules;
- 5) Corporate Governance Policy;
- 6) Safeguarding the use of inside information;
- 7) Risk Policy;
- 8) Internal Control;
- 9) Connected Transaction;
- 10) Code of Business Ethics and Work Performance Guidelines Handbook;
- 11) Whistleblowing;
- 12) Legal Dispute (if any);
- 13) The Company' improvement as recommended by the corporate governance bodies;

The Company's Secretary is in charge of compiling related documents in this regard.

(2) Knowledge Development

All directors possess qualifications as required by the SET. They are knowledgeable and competent. However, various trainings are provided to enhance the continuing work performance improvement. The Company facilitates directors, executives, and Company's Secretary to attend various trainings e.g., trainings as conducted by the Thai Institute of Directors (IOD), the SET, and Office of the SEC including Director Accreditation Program (DAP), Director Certification Program (DCP), Anti-Corruption Course: The Practice Guide (ACPG), Refreshment Training Program (RFP) and Company Secretary Program (CSP). Other trainings include training programs conducted by the Vocational Institute under the Patronage of His Majesty the King, independent agencies, and /or other educational institutes e.g., the Thai Listed Companies Association, the Thai Investors Association.

Remuneration Policy for the Company's Board, Committees, and Top Executives

On 28 February 2012, the Company's Board resolved for the approval of nomination and remuneration criteria for directors of the Company, and have the criteria reviewed yearly since then. The 1/2023 Board's Meeting on 28 February 2023 resolved for the Nomination and Remuneration Committee to review the policy concerning the compensation and other benefits of the Board of Directors, committees, and top executives in accordance with the SET's guidelines, the Company's operating results as compared with its peer companies of a size and complexity comparable to the Company, and the performance of each executive. The Nomination and Remuneration Committee also take into determination the IOD's Director Compensation Survey as well as the following guidelines:

1. Remuneration for Directors

Compensation for the Board of Directors shall be considered taking into account scope of responsibilities of the Board and performance of each director with approval from shareholders.

The Nomination and Remuneration Committee determines the type, payment criteria and amount of compensation and other benefits. As for the remunerations for the Board, Committees, and top executives; there are considered in respects of appropriation of respective responsibilities, the Company's operating results, performance of top executive, and market conditions prior to submission to shareholder meeting for approval.

The annual remuneration in cash and non-cash of each director of the Company's Board, the Nomination and Remuneration Committee takes into determination the alignment of the remuneration package with respective responsibilities, dedication of director, peer companies of a size and complexity, market conditions and competitors. Nonetheless, remuneration in this regard shall be in appropriation of respective duties and responsibilities, performance, and sufficient to attract and retain qualified directors.

2. Types of Remuneration

- 2.1 Meeting allowance paid to, non-executive director or non-salaried director, to reflect performances of the director and to incentivize non-executive director to regularly attend the meetings.
- 2.2 Monthly compensation paid only to executive director to reflect duties and responsibilities of director.

3. Payment Methods

- 3.1 Meeting attendance fee paid to non-salaried directors including audit committee member, independent director, and member of committees.
- 3.2 Fix compensation paid monthly to director to reflect duties and responsibilities as executive and director.

Conflict of Interest

The Board sets forth the policy concerning conflicts of interest and published in the Code of Business Ethics and Work Performance Guidelines Handbook binding all directors, executives and employees to perform their duties with integrity and fairness for the Company and all group of stakeholders. The Company regards this policy as essential for directors, executives, and employees not to seek for personal gains.

The Company also establishes the policy concerning connected transaction that "any connected or related transaction made in non-compliance with the general accepted trade practice shall seek consent from the Audit Committee along with rationality and appropriateness of such transaction to be made. In this regard, approval from the Company's Board is required prior to making the transaction.

In the case whereby the connected or related transaction is made in accordance with requirements and principles provided by the SET & SEC, the Company strictly complies accordingly.

So as to prevent any conflict of interest, the Company stipulates the requirements of the following reports:

1. Report of disclosure of connected transaction with possible conflict of interest

The Company's Board stipulates that there shall be the disclosure of any transaction with possible material conflict of interests. Reporting in connection to this shall include profile of persons having interests, relationship, transaction characteristics, conditions, price policy, total value, rationality, and opinion of the Audit Committee/the Company's Board. The said information shall be disclosed in the 56-1 Form and the Company's annual report as details shown under "Connected Transaction" heading.

In 2023, there was not any non-compliance with the SET principles on making connected transaction in relation to the Company.

2. Report of stake of directors, executives, and connected persons

The directors and executives shall report, to the Company, the description and scope of their stake and stake of the connected persons in relation to corporate management of the Company and subsidiaries. The reports serve the Company as information for its operation concerning the execution of connected transaction that may cause conflict of interest and lead to siphoning of interest of the Company and its subsidiaries. They also serve as information for monitoring the interest of the Company's Board and executives. The reports must be made and submitted once every calendar year and within 30 days as from the end date of December. Resubmitting is required whenever changes incurred which portrayed differences from the report previously submitted. The reports shall be sent to the Company's Secretary who shall compile and deliver to the Audit Committee Chairman and Chairman of the Company's Board.

3. Report of securities holding and changes in securities holding

The Company's Board set forth the policy binding the directors and executives (as defined by the SEC and the SET), including securities holdings of their spouses or minor children and/or connected persons according to Section 59 of the Securities and Exchange Act, shall report the Company's securities holdings as follows:

- First-time reporting using the 59-1 Form within 30 days from the date appointed as director or executive;
- Reports of changes in the Company's securities holdings using 59-2 Form within 3 working days as from the date of purchasing, selling or transferring of the securities. They shall also send copies of the reports to the Company the same day as sending to the SEC.

The directors are required to report of securities holdings to the Company's Board via the Company's Secretary every quarter. The Company's Secretary shall summarize and present, on a quarterly basis, the reports of securities holdings as well as changes in securities holdings of the directors and executives to the Company's Board for acknowledgement. Such reports shall be disclosed in the 56-1 Form and the Company's annual report.

Director or executive having stake in making connected transaction or any employee involved, they are not allowed to involve in the decision-making process of transaction made between the Company and the said stakeholder person or employee involved.

The Company's Board stipulates that director and executive shall disclose any transaction with potential conflict of interests on a yearly basis.

Internal Control and Internal Audit

Internal Control

The Company's Board of Directors gives high priority to a good internal control system. The policy is in place to ensure the adequate and appropriate systematic and holistic internal control management. The practices based on corporate management focusing on righteousness and transparency in alliance with good corporate governance principles regarded as solid foundation of the Company's effective and efficient internal control.

The Audit Committee is entrusted with the consideration of the examination, control, and governance plan, independence of the Internal Audit. Other duties include giving consent on appointing, transferring, terminating of the Internal Audit Head as well as ensuring independency of the Internal Audit concerning the checks and balances standard of performances. The internal auditing report shall be submitted to the Internal Audit Committee at least once every quarter to ensure circumspection of the internal system and control without any negative effect on shareholders.

The Company's Board arranges for evaluation of the adequacy of the internal control system at least once a year with extra review where irregularity occurred that may affect significantly on the Company's operation. The Audit Committee and the Board exchange views and give recommendations for suitability and adequacy of internal control system to help designing appropriate practical guidelines for the Company. In connection to this, the Internal Control Sufficiency Evaluation Form as suggested by the SEC is applied. The form is divided into 5 sections and 17 headings as shown on the Company's website at www.ssscth.com

The 1/2023 Company's Board meeting and the 1/2023 Audit Committee meeting on 28 February 2023 evaluated and came up with the conclusion that the Company has in place the internal control and risk management systems which are adequate, suitable and efficient. In connection to the systems, no material defect has been detected.

Code of Business Ethics and Work Performance Guidelines Handbook
2023 Revised Version

(As approved by the resolution of the Board's Meeting on 28 February 2023)

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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 continually 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 28 February 2023.

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 ecosystem 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.

6. 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.

Audit Committee Charter

(Revised Version 2023)

(Approved by the Resolution of the Company's Board of Directors Meeting 1/2023 on 28 February 2023)

The Audit Committee serves as a sub-committee of the Company's Board of Directors. The Committee plays as a key tool or mechanism to ensure the Company's good corporate governance. The Audit Committee comprises independent directors for management flexibility and independent opinions against financial report and internal audit as well as providing consultancy to the management team and the auditor concerning potential risk management. The Committee shall make sure the disclosure of financial report is complete and accurate in accordance with related standards and requirements which results in reliable financial report.

1. Objectives

The Audit Committee is established aiming at promoting effective operation and adding value to the organization efficiency on the followings:

- (1) Reliability of the financial report
- (2) Performance of the Company's Board

The Committee recognizes its accountability on the following matters:

- Financial report
 - Accounting policy
 - Financial management
 - Internal control and internal audit
 - Business policy and strategy formulation
 - Compliance
 - Business risk management and control
- (3) Improvement of internal and external auditing function and process, and communication between the Committee, Internal Audit Unit, and the auditor.
 - (4) Official meeting between the Committee and the Finance Department.
 - (5) Independence of the auditor and the Internal Audit Unit concerning the expressing of opinion for effective execution of function.
 - (6) Independence and scope of work of the auditor concerning ability to express opinion freely in the event that may induce conflict of interest.
 - (7) Quality of internal audit report.
 - (8) Roles and power of external director.
 - (9) Director's understanding of the defined audit scope.

2. Composition

- 2.1 The Audit Committee shall consist of at least three members appointed by the Company's Board or the AGM. Every member of the Committee shall be independent director.
- 2.2 At least one member possesses knowledge and experience sufficient to review the reliability of financial statement.
- 2.3 The Company' Board shall select one of the Committee members as chairperson of the Committee.
- 2.4 The Audit Committee shall appoint the Company's Secretary or one of the Company employees as Secretary of the Audit Committee. The appointed secretary shall assist the Committee in preparing meeting invitation and organization, delivering supporting documents required by the meeting, and record the minutes of the meeting.

3. Qualifications

- 3.1 The Audit Committee shall be Board's director and independent director with qualifications as specified by the requirements of the Securities and Exchange Commission, and the Stock Exchange of Thailand.
- 3.2 All members of the Committee shall be independent from the management of the Company, subsidiaries, associate companies in the same tier, major shareholders, or persons with power to control the Company.
- 3.3 All members of the Committee shall not be director of the parent company, subsidiaries, associate listed companies in the same tier.

4. Terms of Appointment

- 4.1 The Audit Committee's term of office is 2 years.
- 4.2 Member of the Audit Committee who vacated office may be reappointed.
- 4.3 Member of the Audit Committee vacates office upon:
 - Retiring from the position of director of the Company's Board;
 - Being disqualified by law;
 - Resignation;
 - Death;
 - Being dismissed by the resolution of the Company's Board.

5. Duties and Responsibilities

Scope of duties and responsibilities of the Audit Committee as entrusted by the Company's Board include:

- (1) Review financial reports to ensure adequacy and accuracy;

- (2) Review the appropriateness and efficiency of the internal control system and internal audit, consider the independence of the Internal Audit Unit, give concurrence on the determination of appointment, transfer, termination of employment of the Head of Internal Audit Unit or any unit responsible for internal audit function;
- (3) Review the compliance with law pertaining to securities and exchange law and requirements, and the Company's business-related laws;
- (4) Consider, select, propose for the appointment of independent person as the Company's auditor including compensation fees, convene meeting with the auditor at least once a year without the presence of the management team;
- (5) Consider connected transaction or any transaction with potential conflict of interest to ensure its compliance with law and requirements pertaining to securities and exchange;
- (6) Prepare report of the Audit Committee and have it disclosed in the Company's annual report. Such report shall be signed by chairperson of the Audit Committee and shall include the Committee's opinions on the matters concerning the Company as follow:
 - (a) Completion, accuracy, and reliability of the financial report;
 - (b) Adequacy of internal control system;
 - (c) Compliance with law and requirements pertaining to securities and exchange, and law related to the Company's business;
 - (d) Suitability of the auditor;
 - (e) Transaction with potential conflict of interest;
 - (f) Number of Committee meetings and the attendance of each Committee member;
 - (g) Opinions or observation the Committee received as per the Committee performance according to the charter;
 - (h) Any transaction that should be made known to shareholders and investors;
- (7) Performs other duties as assigned by the Company's Board with consent of the Audit Committee.

6. Meeting

- (1) The Committee shall organize a meeting at least four meetings a year as seen necessary and suitable to a particular circumstance as well as beneficial to the operation of the Committee's function toward achieving the set objectives.
- (2) The Committee may invite the management, internal auditor, compliance personnel, auditor, or related parties involving with the meeting agenda to attend the meeting.
- (3) The Committee may invite external consultant or specialist, at the number the Committee deems appropriate, to give advice or opinion using expense of the Company.
- (4) A quorum shall consist of at least half of the total members of the Committee.

- (5) In an event the chairperson of the Committee cannot attend the meeting, the Committee members who are attending that meeting shall elect one of the Committee members to chair the meeting.
- (6) In the case of voting for a resolution, the majority vote shall be required. In case of tie vote, the chairperson of the Committee shall have a casting vote.

7. Reporting

The report of the Audit Committee is considered importance to the Company's Board, shareholders, and general investors as it demonstrates the independent and straight forward opinions of the Committee which ensures the Board of the circumspect management recognizing the shareholders' equity.

(1) Report to the Company's Board

1.1 Routine activities

- Minutes of the Committee meeting demonstrating clearly the opinions of the Committee on various matters.
- Summary of annual activities.
- Opinions on financial report, internal audit, and internal auditing process.
- Other matters that should be made known to the Board.

1.2 Matters required immediate reporting to the Board

- Transaction with conflict of interest.
- Suspicion or presumption of fraud, or significant irregularity or deficiency of the internal audit system.
- Suspected violation of SET law or requirements.
- Other matters that should be made known to the Board.

(2) Report to Public Entities

In the event the Audit Committee had reported to the Company's Board of the significant impact on the financial status and performance of the Company which the Board and the management have been discussed and jointly resolved for improvement to be carried out within a specified period. In connection to this, if no action as yet to be undertaken without justifiable reason, one of the Committee members may report such event to the SET or SEC.

(3) Report to Shareholders and General Investors

Activities undertaken during the year as per duties and responsibilities assigned by the Board, such report shall be signed by chairperson of the Committee and disclosed in the Company's annual report.

(4) Report to the Thai Private Sector Collective Action Against Corruption Committee

Arranges for the sufficient and appropriate methods for the conformance review of self-assessment form concerning anti-corruption measures to ensure the information filled in the form is accurate and adequate prior to sending to the Thai Private Sector Collective Action Against Corruption Committee for membership certification.

8. Evaluation

To ensure the effective operation of the Committee to achieve the assigned objectives, the Committee is required to conduct self-assessment or other appropriate means for performance improvement.

9. Compensation

The Company's Board shall determine compensation fees for chairperson of the Audit Committee and of the Committee members and present to the AGM for approval.

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Risk Management Committee Charter

(Revised Version 2023)

(Approved by the Resolution of the Company's Board of Directors Meeting 1/2023 on 28 February 2023)

1. Composition and Qualifications

The Board appoints the Risk Management Committee selected among the Company's directors and executives and/or knowledgeable persons. The appointed Committee members shall select one Committee member as chairperson of the Risk Management Committee.

2. Terms of Appointment

The Committee's term of office is in accordance with the tenure of the Board, ending at the annual general meeting of shareholders. The retiring Committee's member is eligible for re-appointment. The retiring member shall retain in the position until the replacement is done, except, the retirement is upon the expiration of term and such member is not re-elected.

In the case of vacancy, the Nomination and Remuneration Committee shall select one of the Company directors and/or knowledgeable person presented to the Board for consideration and appointment. The substitute member shall hold office only for the remaining term of office of the member whom he/she replaces.

3. Duties and Responsibilities

- (1) Provide risk management policy and framework covering key risks i.e., strategic risk, operational risk, financial and accounting risk, corruption risk, compliance risk, and information system risk.
- (2) Lay down strategies, cascading from the risk management policy, to assess, monitor and control Company risks to be within the Company risk appetite.
- (3) Support an encourage cooperation in the management of the Company overall risks, review the adequacy and effective implementation of risk management policy and system.
- (4) Regularly and systematically conduct the assessment and analysis of potential damage occurrence in both normal and critical circumstances so as to ensure risk survey covering every procedure of business operation.
- (5) Continuously support and develop risk management to be in alignment with international standards.
- (6) Report to the Board on any improvement in alignment with the set policy and strategies.
- (7) The Committee is entitled to hire external consultant to provide advices using expense of the Company with consent from the Board.
- (8) Perform other duties as assigned by the Board.

4. Meeting

- (1) The Committee shall convene a meeting once annually as necessary and appropriate.
- (2) Meeting agenda and supporting documents shall be delivered to the Committee members prior to the meeting date.
- (3) A quorum shall consist of at least half of the members of the Committee.
- (4) In the case of voting for a resolution, the majority vote shall be required. Any Committee member who has a conflict of interest in a matter for consideration is not allowed to attend the meeting.

5. Reporting

The Committee shall report on its operation to the Board, and on the operation during the previous year to the AGM covering the followings:

- (1) Number of meetings held;
- (2) Number of meeting attendance of each member of the Committee;
- (3) Performance as per the charter.

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Nomination and Remuneration Committee Charter

(Revised Version 2023)

(Approved by the Resolution of the Company's Board of Directors Meeting 1/2023 on 28 February 2023)

1. Composition and Qualifications

The Board appoints the Nomination and Remuneration Committee selected among the Company directors and executives and/or knowledgeable persons, and appoints an independent director as chairperson of the Nomination and Remuneration Committee.

2. Terms of Appointment

The Committee's term of office is in accordance with the tenure of the Board, ending at the annual general meeting of shareholders. The retiring Committee member is eligible for re-appointment. The retiring member shall retain in the position until the replacement is done, except, the retirement is upon the expiration of term and such member is not re-elected.

In the case of vacancy, the Committee shall consider and select one of the Company directors who possesses the required qualifications and has no prohibited characteristics as Committee member. The substitute member shall hold office only for the remaining term of office of the member whom he/she replaces.

3. Duties and Responsibilities

3.1 Nomination

- (1) Consider nomination policy and criteria for directors of the Board and members of committees including appropriate number, structure and composition, qualifications of the committees to be presented to the Board or the AGM as the case may be.
- (2) In the event of vacancy or other cases, screen and select qualified persons to fill the positions of Board director, committee member, and Secretary of the Company to be presented to Board's meeting and/or the AGM for approval.
- (3) Perform other nomination duties as assigned by the Board.

3.2 Remuneration

- (1) Propose remuneration policy and payment methods for directors of the Board, members of committees, and top executives in appropriation with duties and responsibilities and in accordance with the Company's operating results and market sentiment.

- (2) Determine necessary and reasonable annual compensation fees in the forms of cash and non-cash bases for each director of the Board taking into determination duties and responsibilities, performance, and compared with the companies in the similar business as well as benefits expected from each individual director. Result in this regard is presented to the Board for consideration and subsequent submission to the AGM for approval.
- (3) Responsible for the Board and provide clarification and answer to the inquires at the AGM in relation to remuneration of the Board.
- (4) Report on policy and rational concerning remuneration for directors, executives as required by the SET, and disclose the report in the 56-1 Form and the Company's annual report.
- (5) Perform other remuneration duties as assigned by the Board, determine Company's business strategy, policy, plan and budget to be presented to the Board for concurrence.

4. Meeting

- (1) The Committee shall convene a meeting once annually as necessary and appropriate.
- (2) Meeting agenda and supporting documents shall be delivered to the Committee members prior to the meeting date.
- (3) A quorum shall consist of at least half of the members of the Committee.
- (4) In the case of voting for a resolution, the majority vote shall be required. Any Committee member who has a conflict of interest in a matter for consideration is not allowed to attend the meeting.

5. Reporting

The Committee shall report on its operation to the Board, and on the operation during the previous year to the AGM covering the followings:

- (1) Number of meetings held;
- (2) Number of meeting attendance of each member of the Committee;
- (3) Performance as per the charter.

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Corporate Governance Committee Charter

(Revised Version 2023)

(Approved by the Resolution of the Company's Board of Directors Meeting 1/2023 on 28 February 2023)

1. Composition and Qualifications

The Board appoints the Corporate Governance Committee selected among the Company's directors and executives and/or knowledgeable persons.

2. Terms of Appointment

The Committee's term of office is in accordance with the tenure of the Board, ending at the annual general meeting of shareholders. The retiring Committee's member is eligible for re-appointment. The retiring member shall retain in the position until the replacement is done, except, the retirement is upon the expiration of term and such member is not re-elected.

In the case of vacancy, the Nomination and Remuneration Committee shall consider and select one of the Company directors and/or knowledgeable persons to be presented to the Board for consideration and appointment. The substitute member shall hold office only for the remaining term of office of the member whom he/she replaces.

3. Duties and Responsibilities

- (1) Propose good corporate governance policy guidelines, and code of ethics and work practices to the Board for consideration and approval.
- (2) Oversight of the operations of the Board, Executive Committee, committees, and the management in compliance with good corporate governance principles, Code of Business Ethics and Work Performance Guidelines Handbook as well as anti-corruption measures.
- (3) Constantly review the policies, principles, and work practices in alignment with international practices and/or as suggested by related institutes and/or government bodies to be presented to the Board for consideration and approval.
- (4) Give recommendations concerning code of business ethics and work performance guidelines for directors, executives and employees including opinions on work practices and recommendations for improvement.
- (5) Promote and disseminate good corporate culture to ensure the culture is applicable and comply by all personnel of the Company.
- (6) Consider, appoint, and determine duties and responsibilities of the Company committees in support of, as deemed appropriate, the operations of the corporate governance and business ethics.

- (7) The Committee is entitled to hire external expert as consultant to attend the meeting with the Committee using the expense of the Company.
- (8) Perform other duties as assigned by the Board.

4. Meeting

- (1) The Committee shall convene a meeting once annually as necessary and appropriate.
- (2) Meeting agenda and supporting documents shall be delivered to the Committee members prior to the meeting date.
- (3) A quorum shall consist of at least half of the members of the Committee.
- (4) In the case of voting for a resolution, the majority vote shall be required. Any Committee member who has a conflict of interest in a matter for consideration is not allowed to attend the meeting.

5. Reporting

The Committee shall report on its operation to the Board, and on the operation during the previous year to the AGM covering the followings:

- (1) Number of meetings held;
- (2) Number of meeting attendance of each member of the Committee;
- (3) Performance as per the charter.

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Sustainability Committee Charter

(Revised Version 2023)

(Approved by the Resolution of the Company's Board of Directors Meeting 1/2023 on 28 February 2023)

1. Objectives

The Company's Sustainability Committee was established to support the operations of the Board of Directors regarding organizational sustainability so as to create value for the business, develop the organization to be responsible to society, the environment, and stakeholders for mutual sustainable growth.

2. Composition and Qualifications

The Company's Sustainability Committee consists of at least 7 members: the Chairperson and its members. The Company's Board of Directors appoints members of the Sustainability Committee from directors and/or other persons who can be employees and/or outsiders. Those appointed members must have adequate knowledge and experiences to perform their duties with regard to the sustainability of the organization.

3. Term of Office

- 3.1 The Sustainability Committee serves a term of two years starting from the date of resolution of the meeting of the Company's Board of Directors. Upon completing a term and without resolution for new appointment of the Sustainability Committee, the remaining Sustainability Committee shall maintain their duties until the Company's Board of Directors appoints the new Committee. The appointment should be done within three months starting from the expiry of the old Committee's term.
The member who completes its term of office is eligible for re-appointment.
- 3.2 In case of a vacancy in the Sustainability Committee for a reason other than completion of a term and there is still not less than 3 months remaining in the term, the Board of Directors may appoint the qualified persons as a replacement at the next Board of Directors meeting. The replacement member may hold only the remaining term of office of the member whom he/she replaces.
- 3.3 The members of the Sustainability Committee shall vacate office upon:
 - (a) Completing a term
 - (b) Dismissing or termination of employee status
 - (c) Death
 - (d) Being removed from the Company's Board of Directors
- 3.4 Member who resigns before the completion of his/her term of office needs to write a notice with reason to the Company one month in advance.

4. Meeting

4.1 Meeting Agenda

The date, time, venue and meeting agenda are to be set at least seven days prior to the meeting day with sufficient supporting documents. A written minutes of a meeting should be done after the meeting.

4.2 Meeting Frequency

There shall be at least two meetings per year. Additional meetings can be called as deemed necessary.

4.3 The Quorum

The quorum for the meeting of the Sustainability Committee shall consist of no less than half of the members. The Committee may invite involved persons to participate in the meeting to provide related information. In a case that the Chairman of the Committee is not present at the meeting or unable to perform his/her duties, the members present at the meeting may choose one of the members as the Chairman for such meeting.

4.4 Voting

In the case of voting for a resolution, the majority vote of the members of the Sustainability Committee present at the meeting shall be required. Each Committee member shall be entitled to one vote. However, any Committee member having a personal interest in any matter shall have no right to vote on that particular matter. In the case of an equal number of votes, the chairperson of the Committee shall have a casting vote to resolve a tie.

5. Authorities

- 5.1 To be able to request the presence of the management or employees of the Company to provide opinions or request for documents for additional consideration of related matters as deemed appropriate.
- 5.2 To be able to seek opinions from any other professional experts or advisors of the Company (if any) as deemed necessary at the Company's expenses.
- 5.3 To be able to appoint working groups to implement matters related to sustainability of the Company.

6. Duties and Responsibilities

- 6.1 To formulate, consider, review and improve the policy and guidelines on sustainable development of the Company to stay up-to-date with business changes and in compliance with related regulations, announcements, laws and international standard.
- 6.2 To formulate and revise strategies for the Company's sustainability as well as give related advices to the Board of Directors.
- 6.3 To support and push for the cooperation regarding the Company's sustainability.
- 6.4 To monitor and assess the performance and progress of the sustainability development of the Company in line with the policy and specified goals.
- 6.5 To report its performance to the Company's Board of Directors on a regular basis.
- 6.6 To revise and amend the Sustainability Committee Charter and propose it for the approval of the Company's Board of Directors.
- 6.7 To perform any other duties as assigned by the Company's Board of Directors.

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