



## **Business Code of Conduct**

**Pruksa Holding Public Company Limited and its Subsidiaries**

*(Translation)*

## **Table of Content**

	<b>Page</b>
<b>Message from the Chairman</b>	1
<b>Introduction</b>	2
<b>General</b>	
<b>1. Vision</b>	3
<b>2. Mission</b>	3
<b>3. Core Value</b>	3
<b>4. Strategy</b>	3
<b>5. Definitions</b>	4
<b>6. Scope and Compliance</b>	5
<b>Code of Conduct of Pruksa Holding Public Company Limited and its Subsidiaries</b>	
1) Compliance	7
2) Disclosure and Usage of Insider Information, and Confidentiality	7
3) Data and Information system security and Respect for Intellectual Property	9
4) Charter for Shareholders	9
5) Charter for Customers	9
6) Charter for Employees	10
7) Human Rights	12
8) Fair and Equal Labor Standard	13
9) Purchasing, Procurement, and Relationship with Suppliers, Contractual Parties, and Business Partners	13
10) Competitor Relations	14
11) Internal Control and Auditing	15
12) Political Rights	15
13) Community, Society, and Environment Responsibilities	15
14) Safety, Hygiene, and Environment Responsibilities	16
15) Conflict of Interest	17
16) Overseas Business Operation	18
17) Policy Review	18
18) Whistleblowing	18
19) Guidelines for Monitoring Code of Conduct	19
20) Anti-bribery and Corruption	19

### **Message from the Chairman**

Pruksa Holding Public Company Limited and its subsidiaries ("the Company") recognize the importance of conducting business with good governance, transparency, ethics, and responsibility toward shareholders, customers, employees, and stakeholders across all sectors. The Company is committed to developing the organization for stable and sustainable growth, with business ethics as the cornerstone of its success.

To foster a positive corporate culture and maintain high standards of transparent corporate governance, the Company has developed a "Business Ethics Code" to serve as a guide for all directors, executives, and employees. This manual has been systematically prepared, covering all dimensions of business operations and aligning with the principles of good corporate governance as outlined by the Stock Exchange of Thailand .Including nationally and internationally recognized standards.

The company's board of directors hopes this business ethics code will serve as a clear guideline and example for all directors, executives, and employees. Everyone is required to study, understand, and strictly adhere to it. Directors and executives should be role models for proper conduct, while employees can seek advice from their supervisors, the company secretary, or the secretary of the Corporate Governance and Sustainable Development Committee if they have any doubts. Business ethics is considered an integral part of the company's work regulations, which everyone must strictly follow.

In addition, the Company may establish supplementary policies on significant issues to communicate and emphasize the importance of conducting business ethically and based on the good morals of society, and to encourage relevant departments to disseminate and communicate this Code of Business Ethics to stakeholders such as customers, partners, and business allies, etc. This is to ensure that all parties understand and uphold the values that the Company prioritizes, which will help the Company achieve its set goals thru ethical business cooperation and joint oversight or reporting of behaviour that may constitute a violation of this Code of Business Ethics.

Announced and enforced from 17 October 2025, as per the approved amendment.

\_\_\_\_\_ - Signed - \_\_\_\_\_

( Roongrote Rangsiyopash)  
Chairman of the Board of Directors

## **Introduction**

PrukSA Holding Public Company Limited and its subsidiaries ("the Company") are committed to developing and operating our business for stable and sustainable growth under the principles of good corporate governance, upholding transparency, ethics, and responsibility toward shareholders, customers, partners, employees, communities, and society as a whole.

The Company is well aware that the conduct of directors, executives, and employees at all levels plays a crucial role in building the organization's long-term confidence, trust, and good reputation. To uphold these ethical and good governance standards, the Company has developed the "Code of Ethics for Directors, Executives, and Employees" to serve as a guide for appropriate, transparent, and fair conduct toward all stakeholders.

Code of Conduct is considered an integral part of our operations, reflecting the company's core values of integrity, responsibility, respect for others, and a commitment to becoming a leading organization.

In this regard, all directors, executives, and employees are required to study, understand, and strictly adhere to this Code of Ethics, as well as participate in communicating, conveying, and setting a good example, in order to collectively drive the Company toward becoming a leading organization thru sustainable development.

## **General**

### **1. Vision**

We are dedicated to championing the vision of “Better Homes and Healthier Communities” to propel sustainable growth for all, now and in the future.

### **2. Mission**

We are dedicated to delivering products and services that foster well-being, happiness, and sustainable growth of communities.

### **3. Core Value**

- 3.1 Customer Empathy - quality as a core
- 3.2 Drive for Synergy
- 3.3 Impact for Good
- 3.4 Forward Thinking
- 3.5 People First - trust, respect, and have fun

### **4. Goals and Strategy**

#### **4.1 Strengthening the Core & Enhancing Synergy**

The Company integrates its real estate and healthcare businesses with related entities, including Inno Precast and Inno Home Construction, to enhance group-wide synergy and promote internal collaboration aimed at delivering sustainable returns.

#### **4.2 Diversification & Differentiation**

The Company diversifies its investment portfolio to achieve sustainable income by investing in high-potential businesses that generate recurring revenue.

#### **4.3 Transformation**

The Company is enhancing its organizational culture and management by embracing new technologies to optimize operations. In addition, it is implementing lean processes, developing new capabilities, and focusing on improving the Net-Promoter Score (NPS) to ensure higher levels of customer satisfaction. To further its commitment to sustainability, the Company has also set ambitious decarbonization goals, aligning its efforts with long-term environmental responsibility.

## 5. Definitions

<b>Code of Conduct</b>	means	the Business Code of Conduct of PrukSA Holding Public Company Limited and its subsidiaries.
<b>Company</b>	means	PrukSA Holding Public Company Limited and its subsidiaries.
<b>Subsidiaries</b>	means	subsidiaries by the definitions of the Securities and Exchange Commission.
<b>Directors</b>	means	the directors of the Company.
<b>Executive</b>	means	Chief of Group Executive Officer / Managing Director / Executive Vice President / Senior Vice President / Vice President / Associate Vice President / Senior Manager / Manager / Assistant Manager / Senior Supervisors / Supervisor II / Supervisor I of the Company.
<b>Employees</b>	means	monthly employees/ daily employees/ temporary employees with fixed employment term. The employees are paid wages by the Company or the Company's representatives.
<b>Close relatives</b>	means	a person who has a relationship by blood or by legal status, such as parents, siblings, or spouses, either on de facto or legal status, including spouses of their children.
<b>Suppliers</b>	means	persons that have transactions with the Company to support or promote the Company's business, such as procurers, agents, and service providers.
<b>Customers</b>	means	people who buy the Company's products or services.
<b>Related parties</b>	means	any person or juristic person related to the Company or having a business relationship with the Company, such as the government, government agencies, government enterprises, private sector organizations, or public charity organizations.
<b>Stakeholders</b>	means	persons involved with the Company in various aspects, such as directors, executives, employees, shareholders, related parties, trading partners, customers, and society.
<b>Other benefits</b>	means	other benefits that are not specified in this Code of Conduct.
<b>Tradition</b>	means	festivals or holidays that may involve gifts and occasions to express congratulations, appreciation, greetings, condolences, or support in accordance with social etiquette.
<b>Insider information</b>	means	data that is yet to be revealed to the public, which can significantly impact securities price or value.

## **6. Scope and Compliance**

### **6.1 Persons Obligated to Comply with the Code**

All directors, executives, and employees must strictly adhere to the Code of Conduct with understanding, acceptance, and faith. They should also take care to avoid any violations of the Code of Conduct and set themselves as good examples.

### **6.2 Recommendations**

- 6.2.1 Read and understand the content of this Code of Conduct.
- 6.2.2 Learn about the sections related to your duties and responsibilities.
- 6.2.3 Regularly review the content of this Code of Conduct.
- 6.2.4 Educate other people whose works are related to the Company or may impact the Company.
- 6.2.5 If you have any questions about compliance with this Code of Conduct, please consult with your supervisor and/or the Human Resource Department and/or the corporate governance and compliance unit and/or the Secretary of the Corporate Governance Committee.
- 6.2.6 Inform your supervisor or a responsible person if you witness any violation or breach of this Code of Conduct.
- 6.2.7 Cooperate with entities or persons authorized by the Company in any investigation.
- 6.2.8 Supervisors of all levels must be good leaders and set good examples in complying with this Code of Conduct. They must also encourage the employees and all related parties to be aware of and strictly comply with this Code of Conduct.

### **6.3 Actions Violating the Code**

- 6.3.1 Failure to comply with this Code of Conduct.
- 6.3.2 Recommending or supporting others to breach this Code of Conduct.
- 6.3.3 Ignoring any breach or non-compliance with this Code of Conduct that one is aware of or should know because it is related to one's responsibilities.
- 6.3.4 Not cooperating or impeding an investigation of any complaint regarding breach or violation of this Code of Conduct.
- 6.3.5 Mistreating someone because that person has reported a breach of this Code of Conduct.

An individual breaching this policy will face disciplinary action according to the Company's rules and may also be subject to legal penalties if the action constitutes an offense.

#### 6.4 Duties and Responsibilities

- 6.4.1 The Board of Directors shall establish the Code of Conduct and oversee its implementation. The Board may delegate this responsibility to a sub-committee, who must regularly update the Board on important matters.
- 6.4.2 The Corporate Governance and Sustainable Development Committee is a sub-committee appointed by the Board of Directors to oversee compliance with this Code of Conduct. Its responsibilities include implementing measures and activities to promote awareness and compliance with the Code of Conduct, reviewing and updating the Code of Conduct to ensure compliance with relevant laws, regulations, and internationally and nationally accepted standards. In addition, the Corporate Governance and Sustainable Development Committee is responsible for addressing complaints regarding breaches of the Code of Conduct. The committee provides advice to management on investigating complaints, making improvements, and preventing future breaches of the Code of Conduct.
- 6.4.3 The Executives of all levels have the following duties:
- 1) To promote compliance with this Code of Conduct and set good examples.
  - 2) To disseminate policies and guidelines and listen to opinions about compliance with this Code of Conduct.
  - 3) To provide training to the employees to make them aware of their responsibilities and align the Company's administration with the laws and the Company's regulations.
  - 4) To ensure the Company's compliance with applicable regulations.
- 6.4.4 The Human Resource Department or the human resource unit has a joint duty with the corporate governance and compliance unit to communicate and explain to the employees the content of this Code of Conduct and their duties to comply with it.
- 6.4.5 The Internal Audit Department is responsible for establishing an effective internal control system to prevent any actions that could violate the Code of Conduct and potentially harm the Company. The department must also develop an internal audit system and strategy for assessing compliance with the Code of Conduct. Additionally, it is the department's duty to conduct preliminary investigations into any potential breaches of the regulations and the Code of Conduct.
- 6.4.6 The Risk Oversight and Sustainability Department is responsible for evaluating risks associated with compliance or non-compliance with the Code of Conduct. The department provides opinions to the Risk Oversight Committee and offers advice to management on developing risk minimization solutions.
- 6.4.7 The Corporate Governance and Compliance Department supports and promotes the performance of the Board of Directors, and the Corporate Governance and Sustainable Development Committee. The department is responsible for monitoring and improving the standards related to matters outlined in the Code of Conduct before proposing it to the Corporate Governance and Sustainable Development Committee. It also informs and promotes awareness and compliance with the Code of Conduct among directors, executives, employees, business partners, suppliers, customers, and future key stakeholders.



## **Code of Conduct of Pruksa Holding Public Company Limited and its Subsidiaries**

### **1. Compliance with the Law and Company Regulations**

- 1.1 The Company must comply with all applicable laws and regulations, including those of the Stock Exchange of Thailand, the Securities and Exchange Commission, the Capital Market Supervisory Board, and those of the Company itself. Additionally, the Company will not engage in illegal activities or activities that are contrary to public peace or good morals. The use of Company employees or property for illegal purposes is strictly prohibited.
- 1.2 It is not acceptable to claim that violating the law, shareholder resolutions, Board of Directors resolutions, regulations, rules, or orders of the Company can increase profits for the Company.
- 1.3 The Company must conduct its business operation with good faith, prioritizing its rightful benefits, even in the presence of loopholes in the laws, rules, regulations, and orders.

### **2. Disclosure and Usage of Insider Information, and Confidentiality**

- 2.1 The Company has a policy of transparent and accurate communication with shareholders and the public, free from any misleading intent.
- 2.2 The Directors, Executives, and employees are not allowed to disclose insider information without permission. They are also prohibited from trading securities of the Company or any company from which they are exposed to insider information, either for personal gain or for the benefit of a related party.
- 2.3 Any disclosure of insider information must be approved by the Group Chief Executive Officer in compliance with applicable laws, good governance principles, and this Code of Conduct. The Group Chief Executive Officer may personally handle this responsibility or delegate it to another person.
- 2.4 The Company's personnel shall not answer questions or express opinions to any third-party, unless they are specifically assigned to do so.
- 2.5 The central units, namely the Corporate Communication Department, the Investor Relations Department, and the Company Secretary Department, are responsible for providing information to the public, investors, and shareholders in a proper, equitable, and timely manner. A department in possession of relevant information is obligated to share it with these central units.
- 2.6 The Company ensures data security by classifying information according to its security level and by following confidentiality practices. All important documents and confidential information must be secured based on their classification levels. The Company also implements information and IT security policies that adhere to widely accepted international and national standards.

- 2.7 The Company's policy is to keep the information of its executives, employees, suppliers, customers, and trade secrets confidential unless disclosure is required by law for litigation purposes or approved by the Board of Directors.
- 2.8 When recruiting an individual who has previously worked for a competitor or the government, the Company must thoroughly research and review any non-disclosure agreements that the individual may have signed with their former employer or with the government before joining the Company. The Company shall not take any action that would cause the individual to violate their agreement with their previous employer or the government, as this could result in legal action.
- 2.9 All directors, executives, individuals holding positions in accounting or finance, individuals responsible for business operations, auditors, employees, and spouses and minor children of these individuals are required to report any changes to their securities holding to the Securities And Exchange Commission (the "SEC") pursuant to section 59 of the Securities and Exchange Act B.E. 2535 (1992) (as amended) and always submit the copy of this report to the Company on the same day as the SEC submission. The Company has assigned personnel to take care of the communication and education for these individuals about this matter.
- 2.10 The "blackout period" is the 30 days leading up to the quarterly and yearly performance announcement date, as well as for 24 hours after the announcement. During this time, all directors, executives, and employees who may have had access to insider information are prohibited from trading, transferring, and accepting securities of the Company.
- 2.11 The "quiet period" is the 14 days before the quarterly and yearly performance announcement date. During this time, the Company prohibits its personnel from disseminating information or giving interviews about the Company's quarterly and yearly performance.
- 2.12 The Company requires directors and high-level executives to provide advance notice to the Company Secretary at least one day before conducting any transactions involving the Company's securities, such as buying, selling, transferring, or accepting transfers.

### **3. Data and Information system security and Respect for Intellectual Property**

The company places great importance on data and information system management, as well as the protection of personal data and respect for intellectual property rights, which are considered essential components of good corporate governance, transparency, and accountability to all stakeholders. Therefore, the company is committed to and promotes a positive corporate culture as follows:

#### **3.1 Information and IT Security**

The company has established an Information Security Policy to provide guidelines for managing data and information systems to ensure they are secure, accurate, complete, and available, in accordance with

international standards such as ISO/IEC 27001 and internationally recognized information technology risk management practices.

The company has appropriate measures in place to control the access, storage, use, and transfer of data to prevent loss, unauthorized access, alteration, or improper disclosure of information, and to raise awareness among all employees about their roles and responsibilities in protecting the organization's data security.

### 3.2 Personal Data Protection

The company collects, uses, discloses, and retains personal data of directors, executives, employees, customers, partners, service users, and all stakeholders in accordance with the principles of the Personal Data Protection Act. Professor 2562 (PERSONAL DATA PROTECTION ACT B.E. 2562 (2019), with the following key principles:

3.2.1 Collect data only as necessary and for clear purposes.

3.2.2 Inform data subjects of their purpose and rights before or during data collection.

3.2.3 Do not use or disclose information for personal or other improper gain.

3.2.4 Implement measures to protect personal data from leakage and unauthorized access.

3.2.5 Appoint a Data Protection Officer (DPO) and a PDPA working group to oversee and provide guidance on compliance with the law.

### 3.3 Intellectual Property Respect

The Company does not support or condone any actions that constitute intellectual property infringement in any form, whether it be copyright, patents, trademarks, trade secrets, or any other intellectual property rights, belonging to the Company itself, its subsidiaries, partners, or third parties.

All employees must use software, documents, data, or various digital media legally and must respect the intellectual property rights of others. It is prohibited to reproduce, modify, distribute, or utilize the intellectual property of others without permission. Additionally, the company encourages its partners and business associates to comply with relevant intellectual property laws and regulations to foster a culture of integrity and responsibility within the business chain sustainably.

The company is committed to maintaining data security, protecting personal information, managing information systems, and respecting intellectual property. These are considered the "PILLARS OF DATA ETHICS," reflecting the company's commitment to conducting business transparently, securely, and responsibly in the digital age.

#### **4. Charter for Shareholders**

The Company is dedicated to effectively representing all shareholders. It is also committed to building long-term credibility and adding value through consistent returns on investment, as per the guidelines below.

- 4.1 To operate business with honesty and transparency and to make careful, calculated, and fair decisions for all shareholders.
- 4.2 To be committed to providing consistent returns and delivering long-term business value.
- 4.3 To ensure transparent, direct, and honest disclosure of important information without distortion or misleading statements, providing only reliable and reasonable information.
- 4.4 Never exploit any of the Company's non-public information or engage in any actions that create conflicts of interest with the Company.
- 4.5 To treat all shareholders equally and with respect.
- 4.6 To adhere to the Business Code of Conduct and fulfill the Company's responsibilities to stakeholders.

#### **5. Charter for Customers**

The Company focuses on providing a Live Well, Stay Well experience for every customer by delivering comprehensive products and services that meet customers' needs and integrating expertise and excellence throughout all business segments. The Company is committed to the following.

- 5.1 Honest business practices and fair treatment of customers.
- 5.2 Delivering high-quality products and services that are safe for our customers.
- 5.3 Providing complete, accurate, and sufficient information about products or services to help customers make informed decisions without any propaganda or omission of facts.
- 5.4 Assisting customers with a service-oriented mindset and a commitment to continuously improve our standards.
- 5.5 Listening to customers' opinions to develop and improve our services and assigning personnel and communication channels specifically for customer communication.
- 5.6 Protecting customers' personal data and not misusing it or using it without consent unless such data is required to be disclosed to a third party under applicable laws, such as the Personal Data Protection Act (PDPA) B.E. 2562 (2019).

## **6. Charter for Employees**

All employees are invaluable assets that propel the Company to success. The Company places emphasis on providing holistic care for employees, respecting their rights, and fostering a corporate culture that encourages the employees' personal growth alongside the growth of our business, society, and the environment.

### **6.1 Privacy**

Personal rights and liberty are safeguarded against all misuse, disclosure, or transfer of any personal data, such as biographical information, medical records, and employment history, to an unrelated third party, which could potentially damage the data subject or any other person, unless such use is in good faith and in line with the objectives for which the data subject has given consent, as mandated by laws, or for the public interest, as prescribed by the PDPA.

- 6.1.1 The Company protects the employees' personal data in the Company's possession.
- 6.1.2 Only when the employee approves can the personal data of that employee be disclosed or transferred to the public.
- 6.1.3 Disclosure and use of the personal data of the Company's employees and related parties are under need-to-know restrictions.

### **6.2 Equality and Equal Opportunities**

- 6.2.1 The Company treats the employees with respect and dignity.
- 6.2.2 The Company has a policy and practice of fairly recruiting and selecting personnel for each position based on the candidates' education, experience, and other relevant qualifications, without regard to their gender, age, race, religion, physical or mental disability, political views, or any other discriminating factors.
- 6.2.3 The Company ensures fair and equal compensation for all employees, based on their position, performance, and the Company's capabilities, without any discrimination. It also guarantees that employees receive at least the minimum rights and benefits required by law (or higher, as appropriate). Additionally, the Company actively seeks opportunities to extend these benefits to cover employees' family members as necessary and appropriate.
- 6.2.4 The Company supports its employees in pursuing external training and development, as well as offering internal training curriculum.
- 6.2.5 The Company offers career advancement and personal development plans, emphasizing employees' growth in their current career path or another career of choice. This leads to employees feeling proud of themselves and eager to learn new things continuously.

- 6.2.6 The Company always provides various communication channels and methods to ensure continuous and seamless communication with its employees.
- 6.2.7 All employees are encouraged to express their opinions, which can benefit both the employees and the Company. Additionally, the Company has established a welfare committee as required by law, providing employees with opportunities to discuss their benefits and welfare. The Company also has whistleblowing channels for filing complaints about situations that breach company policies, the Business Code of Conduct, contracts, and agreements. All recommendations and opinions are carefully considered to find the best solutions that benefit everyone and foster strong relationships in the workplace.
- 6.2.8 The Company encourages its employees to express their opinions as permitted by laws and on any significant changes in the Company that may impact them and their families. However, this right should not infringe upon the rights of others or cause damage to the Company.

### **6.3 Harassment**

- 5.3.1 The supervisors should set good examples for employees and the employees should not show disrespect towards their supervisors.
- 5.3.2 The employees shall not abuse or harass anyone, whether verbally, physically, or based on race, religion, gender, age, physical or mental disability, belief, etc.
- 5.3.3 All employees are always strictly prohibited from engaging in any form of sexual abuse, harassment, or assault towards their colleagues or any other individuals, regardless of gender, within the workplace and at any time.
- 5.3.4 Other people's dignity, rights, duties, and responsibilities must always be respected.

### **6.4 Termination**

In all cases of employment termination, the Company adheres strictly to all applicable employment laws and regulations, avoiding unfair termination and discrimination.

The Company will notify the affected employee of the termination within the time frame outlined in the Company's protocol and in accordance with all applicable laws and regulations.

## **7. Human Rights**

The Company places great value on human rights and promotes fair treatment of all stakeholders in compliance with human rights laws and practices both domestically and internationally. The Company is committed to eliminating discrimination and bias based on physical and mental conditions, race, nationality, origin, ethnicity, religion, gender, language, age, skin color, education, social status, culture, tradition, and other discriminating factors. This commitment extends to stakeholders who may be at risk of human rights violations in the Company's business activities and throughout the value chain, such as communities, business

partners, suppliers, and the environment. The Company expects its business partners to uphold these same principles. The Company conducts human rights due diligence for the Group's main business segments and key business partners at least every two years. The results of the due diligence, as well as any solutions or compensation, are disclosed to the stakeholders.

## **8. Fair and Equal Labor Standard**

### **8.1 No Forced Labor and Modern Slavery**

The Company unequivocally prohibits any form of forced labor or modern slavery within its operations. This includes any coercion of individuals through physical violence, sexual abuse, confinement, debt bondage, wage payment default, late payment, limitations on freedom of movement, isolation, charging money, or holding employees' identification documents. The only exceptions are actions that are not in violation of the law.

### **8.2 No Child Labor**

The Company strictly adheres to the minimum working age as per the country's laws and regulations. Additionally, the Company promotes child-friendly business operations in accordance with the Children's Rights and Business Principles (CRBP) of the United Nations. Business partners must not employ individuals under 18 for tasks that may affect their mental and physical well-being, ethics, and safety.

### **8.3 Respect for the Individual Rights and Liberties of Employees.**

The Company's policy is to treat everyone equally and to never discriminate.

The Company encourages its employees to respect others, not infringe on other people's rights, and accept each other's differences, as everyone is entitled to their own rights and liberty. In this regard, everyone must comply with the laws and not violate the peace and order of the country and the Company.

## **9. Purchasing, Procurement, and Relationship with Suppliers, Contractual Parties, and Business Partners**

9.1 The procurement process and all agreements with suppliers, contractual parties, and business partners must be direct and compliant with the governing policy. Suppliers, contractual parties, and business partners mean financial institutions, sales representatives, and all other suppliers, contractual parties, and business partners involved throughout the supply chain.

9.1.1 Competition must be fair and based on transparent procurement policies, sufficient information, and equitable evaluation criteria. The Company must also maintain open communication with its suppliers, contractual parties, and business partners.

- 9.1.2 Suppliers, contractual parties, and business partners throughout the supply chain must treat their workers fairly in accordance with applicable laws, contracts, agreements, and the Company's Business Partner Code of Conduct. The Company also encourages its suppliers, contractual parties, and business partners to uphold human rights principles and ensure transparency, honesty, and social and environmental responsibilities in their business practices.
- 9.1.3 The Company makes available management and monitoring systems to ensure complete compliance with all contractual provisions and to prevent corruption and misconduct throughout the procurement process.
- 9.1.4 The Company must ensure timely payments to suppliers, contractual parties, and business partners, as well as loan repayments to financial institutions and loan payment terms within the group.
- 9.1.5 The Company inspects, selects, and evaluates suppliers to cultivate long-term partnerships and eliminate below-standard partners that do not comply with the mutual agreements unless such failures can be rectified in the future.
- 9.2 The Company is dedicated to building and nurturing long-term, sustainable relationships with suppliers and contractual parties who prioritize product quality, valuable services, technical excellence, and trustworthiness. The Company also encourages knowledge sharing and capacity development with its partners.

## **10 Competitor Relations**

The Company's goal is to attain sustainable business success and maintain a reputation as a fair and ethical industry leader. This involves supporting and advocating for free and fair trade, avoiding market monopolization, and refraining from any actions that could be perceived as market manipulation. The Company's trade competition policy prohibits illegal or unethical acquisition of competitors' information. Below are the guidelines on competitor relations.

- 10.1 To always comply with the rules of fair competition.
- 10.2 Never use dishonest or inappropriate means to obtain secret information from competitors in order to gain business advantages.
- 10.3 Never discredit or aim to destroy the reputation of any competitors.
- 10.4 Never enter into any contracts or agreements that unfairly limit or eliminate competition without valid reasons.



## **11 Internal Control and Auditing**

- 11.1 The Company has an internal control and auditing system and ensures a good environment so that the employees have positive feelings about internal control.
- 11.2 The Company conducts proper risk evaluations to ensure compliance with corporate governance principles. This guarantees the achievement of objectives, efficiency, effectiveness, work success, accuracy of financial reports, and compliance with laws, regulations, and orders, as well as a robust control process in all aspects. The Company also carries out effective monitoring and evaluation processes to ensure proper and successful operations. These processes are updated at least once a year.
- 11.3 The Company has established an internal audit unit that reports directly to the Audit Committee. Their duties and responsibilities are clearly defined in writing to ensure effective internal audits. The members of the internal audit team are sufficient in number, highly skilled, and ethical.

## **12 Political Rights**

The Company is politically neutral and always supports its employees in exercising their civil rights as stipulated and permitted by law. However, the employees are prohibited from using the Company's name, time, or property for political gain or to support political movements. The employees must take precautions to ensure that outsiders do not mistakenly believe that the Company is not politically neutral. Being politically neutral means that the Company does not support any political party or politician and always avoids making comments or expressing opinions on politics.

## **13 Community, Society, and Environment Responsibilities**

The Company values the rights of people in the community and encourages community engagement at both the local level (such as around the workplace) and the broader level (society as a whole). The Company has established guidelines and a dedicated team to gather community opinions before and after each project. The Company also supports joint activities to foster strong relationships and enhance the quality of life in the community. In addition, the Company educates its employees about environmental conservation and efficient resource use. It is important to note that the Company never exploits environmental initiatives for the sole purpose of enhancing the Company's reputation or promoting products or services (no greenwashing).

The Board of Directors has established a comprehensive Sustainable Development Policy and clear guidelines on environment, society, and corporate governance. The Company's personnel are encouraged to strictly adhere to these policies. Business partners throughout the supply chain are also informed about the policies. The main objective is to benefit both the Company and the stakeholders in the long term. Below is a summary of these policies and guidelines.

- 13.1 To prioritize environmentally friendly innovation and materials and to efficiently use resources through effective manufacturing processes and technologies.

- 13.2 To promote environmental awareness, responsibility, and action among the Company's employees to minimize environmental impact effectively.
- 13.3 To ensure resource efficiency and proper waste management in accordance with the criteria specified by laws.
- 13.4 To respect the traditions, culture, and customs of each country where the Company operates businesses.
- 13.5 To engage with communities in understanding issues and needs that the Company can address in order to improve their quality of life. To consider working with government agencies, the private sector, and community representatives to tackle these matters.
- 13.6 To cooperate with communities in the nearby area where the Company operates businesses, as appropriate.
- 13.7 To develop projects that can practically promote benefits for communities and to monitor the results and progress in the long term.

#### **14 Safety, Hygiene, and Environment Responsibilities**

The Company has clear and tangible policies on safety, hygiene, and the environment, prioritizing the safety and hygiene of surrounding communities and societies. The Company understands it is a part of society and is ready to contribute to sustainable social and environmental development. Therefore, the Company has continuously conducted activities for communities and society, as well as fulfilling community and social responsibilities, as follows.

- 14.1 To support compliance with safety laws and other relevant regulations in the Company's business activities.
- 14.2 To prescribe that every employee must prioritize workplace safety in their everyday work.
- 14.3 To prescribe that supervisors of all levels must set good examples and educate their employees on workplace safety.
- 14.4 To encourage all employees to always prioritize their own safety and that of their colleagues and the Company's property while working.
- 14.5 To prescribe that all employees must always keep the workplace clean and orderly.
- 14.6 To support activities that promote the employees' awareness of workplace safety.
- 14.7 To support continuous improvement of safety procedures and systems.
- 14.8 To aim at seeking ways to minimize environmental impacts by monitoring and controlling pollution and effectively managing hazardous and non-hazardous waste in order to protect the natural environment.

- 14.9 To efficiently use resources and energy and minimize pollution from the Company's activities in order to minimize impacts on the environment and community.

## **15. Conflict of Interest**

### **15.1 Internal Transactions**

When conducting internal transactions, the Company ensures fair transactions without any transfer of interests between the companies in the Group. This is always done in compliance with applicable laws and regulations, the Company's rules, local rules and conditions, as well as the Company's policy and procedures on related party transactions. Additionally, the Audit Committee is responsible for regularly examining internal transactions to ensure transparency, as if they were conducted with non-interested third parties.

### **15.2 Transactions with Third-party Individuals or Companies**

Transactions with third-party individuals or companies must be fair and comply with agreed-upon conditions. Any transaction that may cause damage or trouble to the Company or the third party should be avoided.

- 15.2.1 The Company must prioritize fair market prices without discrimination or obstruction of businesses using undue or unlawful methods.
- 15.2.2 The Company should refrain from engaging in transactions that could damage its reputation, even if they offer potential business benefits.
- 15.2.3 The Company's personnel are strictly prohibited from using the names of the members of the Board of Directors or the executives to enter any transactions that are not related to the Company, even if such transactions do not directly impact the Company.

### **15.3 Transaction with the Government**

When conducting transactions with the government, the Company must avoid any action that could influence a government entity or officer to engage in misconduct. However, it is acceptable to have appropriate interactions with government officers in a friendly manner, such as greeting each other in a public space or visiting on special occasions.

- 15.3.1 All communication with government agencies or entities must be professional and transparent.
- 15.3.2 The Company's personnel must be aware of the differences in local laws, regulations, and customs.
- 15.3.3 The Company complies with the laws and regulations of each country regarding the engagement of government employees, whether as consultants or as the Company's employees. The hiring or employment conditions must be transparent and appropriate.

## **16 Overseas Business Operation**

When conducting business activities overseas, such as establishing companies, factories, branches, agents, distributors, export/import businesses, joint ventures, or any other business transactions, it is important to comply with local laws and regulations. The Company must also consider the local environment, customs, traditions, and culture.

- 16.2 Employment of locals must follow the local labor laws.
- 16.3 All transactions must be regularly inspected.
- 16.4 The Company must monitor and stay updated on any changes in the laws of that country.
- 16.5 The Company must adhere to the international trade control laws of the countries in which it operates.

If one witnesses any ambiguous conduct or potential violation of the law, they should report it to their supervisor or legal counsel.

## **17 Policy Review**

Policy review will be conducted once a year or when a situation has the potential to significantly impact this policy.

## **18 Whistleblowing**

If a business partner suspects that any action might violate the business code of conduct or a supplementary policy, they can file a complaint with the Chairman of the Board of Directors, the Chairman of the Audit Committee, the Internal Audit Department, and other authorized parties using the channels and methods prescribed by the Company in its whistle-blowing policy, which is available on the Company's website. The complainant/whistleblower will be protected under this policy.

- 18.1 The individual acting as a whistleblower or cooperating in the investigation may opt to disclose their identity or remain anonymous if doing so would compromise their safety or result in any form of harm. In this context, opting to disclose one's identity allows the Company to more effectively and promptly provide updates on the progress of the case, explain the facts, and mitigate any damage.
- 18.2 The Company will not disclose any identifiable information about the whistleblower or any person cooperating in the investigation. And the Company will conduct a thorough investigation.
- 18.3 The recipient of the complaint must keep all relevant information confidential and only disclose it as necessary, taking into account the safety and potential harm to the whistleblower, the person cooperating in the investigation, informants, or any other involved parties.

- 18.4 If the whistleblower or the person cooperating in the investigation perceives that they may be at risk or in jeopardy, they are entitled to request the Company to provide them with appropriate protective measures. The Company may also implement protective measures proactively if there is a reasonable belief that trouble or danger is imminent.
- 18.5 All affected parties will receive equitable and just compensation for any incurred damages.

## **19. Guidelines for Monitoring Code of Conduct**

The company places importance on continuous monitoring and evaluation of compliance with the code of Conduct to prevent actions that are inconsistent with ethical principles. Appropriate penalties are set and legal action is taken, along with strict adherence to internal company policies.

The Company has an effective internal control system and anti-corruption measures. The Company also regularly monitors, inspects, and evaluates compliance with the Code of Conduct to ensure effective, transparent and accountable governance.

The Company also prioritizes promoting knowledge and understanding of ethics, policies, and anti-corruption measures among employees and stakeholders on a continuous basis to foster a corporate culture that upholds honesty, transparency, and responsibility at all levels of the organization.

## **20. Anti-bribery and Corruption**

The Company recognizes the importance of preventing bribery and corruption. Therefore, it has implemented the Anti-corruption Policy as a supplementary policy to this Code of Conduct. This policy serves as an additional guideline for all personnel across the organization. The Company also urges its partner companies to establish similar policies and join in collective efforts against corruption both domestically and internationally. The Anti-corruption Policy will be publicly available on the Company's website.