



BUSINESS CODE OF CONDUCT

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Article 1. Code of Conduct of Directors

Directors play the key role as the ones who lead the company to success in sustainable business by determining the policies and directing behaviors of the personnel, as well as governing the company business to ensure transparency, verifiability, without corruption, and good corporate governance. Directors shall be qualified morally and ethically with integrity and knowledge of management and operation control. They shall also comply with the laws and rules determined for maintaining of the benefits of the company, customers, shareholders, and all stakeholders.

Therefore, directors shall maintain the high level of morals and ethics, behave appropriately, and perform their duties with integrity and prudence in accordance with applicable law and regulations as the role model for employees at all levels. The main principles are as follows:

Leadership and vision

- The Board has strong leadership skill and vision. They are independent in terms of decision-making for the utmost benefit of the company and the overall shareholders. The Board arranges clear division of their roles and responsibilities and the management's roles and responsibilities. The management is responsible for searching information for consideration and the Board shall consider the proposed matters.
- The Board aims at strengthening the company's business for stability and sustainable success in the long run. Therefore, they collaborate with the management in reviewing and determining vision and mission which are suitable for the changing environment. Also, the Board determine the targets, business plans, and budget plans by taking account of the increase of economic value to the fullest extent and the long-term stability of the company and the shareholders on annual basis. Moreover, the Board is responsible for governing and monitoring the management performance to ensure efficiency and effectiveness in accordance with the business plan.
- The Board fosters the corporate governance system in organizational management by determining the corporate governance guidelines, code of conduct, measures, and approval procedures, intercompany transactions, or persons who may have conflicts of interest. The scope of powers and duties is also clearly divided between the shareholders and the Board, the Board and the management and the sub-committees for checks and balances and independent audit.



Conflicts of interest

The Board shall consider the intercompany transactions which may result in the conflicts of interest between the shareholders and the management in the careful, honest, reasonable, and independent way under the framework of code of conduct. Complete disclosure of information shall also be ensured for the overall benefit of the company under the rules and regulations, notifications, or requirements of the Stock Exchange of Thailand. In addition, the Audit Committee shall give opinions on necessity and appropriateness of the intercompany transactions.

The Board has determined the measures and procedures for approval of the intercompany transactions with the related companies or persons who may have the conflicts of interest. The persons who have direct or indirect interest shall not be allowed to take part in consideration of the transactions. The Audit Committee is determined to take part in the consideration and give suggestions on necessity and appropriateness of the proposed transactions for the utmost benefit of the company. Also, the intercompany transactions are disclosed in the note to financial statements in accordance with the generally acceptable accounting standard in the annual report.

Anti-corruption

The company regards corruption as illegal and it can ruin reliability of business operation of the company. Therefore, the company has the policy to prevent all kinds of corruption, whether direct or indirect, which applies to all business and transactions related to the company to prevent any damage to the company and the society. ethics, transparency, verifiability, especially in the processes in connection to or at risk of corruption within the company. The anti-corruption policy is as follows:

Directors, executives, and employees of the company shall not demand or accept the interests or property, whether direct or indirect, which may lead to performance or omission of performance of their duties in the wrongful way which may cause the company to lose such interest.

Directors, executives, and employees of the company shall not offer any interests to the third party and the stakeholders of the company to persuade that person to perform or omit performing any illegal or wrongful actions which are not their own duties.

Any corruptions shall be deemed as serious wrongdoings, and the actions shall be strictly taken against the person who commits such acts in accordance with the company's rules and regulations and/or the law.



Article 2. Code of Conduct of Management

The company has the policy on conducting business by considering of the stable and sustainable growth of the company on the basis of integrity, morality, and ethics to ensure legality of the business in accordance with the corporate governance principles. Therefore, the Code of Conduct of Management has been established as follows:

Code of conduct for shareholders

- (1) Perform duties honestly and fairly for the utmost benefit of all shareholders
- (2) Comply with the applicable laws, rules, and regulations, as well as the article of association of the company
- (3) Perform management duties for the utmost benefit of the company
- (4) Report data, information, and the company status completely without distorting facts to all shareholders equally
- (5) Do not do anything which may cause conflicts of interest to the company
- (6) Do not use any data which has not been publicly disclosed or information which affects the company business to seek benefit for themselves and other related persons.
- (7) Do not disclose any confidential information to the outsiders.
- (8) Report the shareholders of the company trends both positive and negative with sufficient supporting evidence

Code of conduct for employees

- (1) Treat employees fairly and equitably. Employment, appointment, consideration, and transfer shall be conducted honestly based on knowledge, ability, and eligibility.
- (2) Strictly comply with the laws and regulations related to employees.
- (3) Treat employees politely and do not disclose the employee information without permission to outsiders.
- (4) Give fair compensation to employees, including welfare and benefits, such as provident fund, medical expense, dental expense, etc.
- (5) Put importance on development of potentials in the employee field of work on fair and equitable basis.
- (6) Put importance on maintaining work environment to ensure safety to life and property of employees



- (7) Provide channels for employees to express their opinions, suggestions, and complaints in case of unfair treatment, or report the case which seems to violate the laws, rules and regulations of the company, or report any concerns about behaviors which may lead to unethical or illegal actions, financially inappropriate behaviors or fraudulent acts, or report any illegal actions or any actions which are against the company policies. All complaints may be submitted to the persons/units designated by the company which shall be kept confidential.

Code of conduct for customers

- (1) Treat all customers fairly and equitably.
- (2) Deliver products/services having the quality as required or higher than customer expectation under fair condition.
- (3) Disclose correct and complete information related to products and services to the customers without distorting facts which may mislead the customers about the quality, quantities, or conditions of the products or services.
- (4) Procure confidentiality measures to protect confidential information of the customers. Do not use the data or confidential information of the customers for benefit of self or other related persons unless such disclosure is required by the law.
- (5) Arrange channels for filing complaints and suggestions about the products and services.

Code of conduct for partners

- (1) Treat all partners fairly and equally on the basis of mutual fair compensation.
- (2) Do not demand, accept, or pay any commercial benefit in bad faith.
- (3) Strictly comply with agreed conditions. In case of inability to comply, the partner shall be notified immediately to seek appropriate solutions.

Code of conduct for trade competitors

- (1) Behave under generally accepted competition rules.
- (2) Do not violate secrecy or try to obtain confidential information of the trade competitors with dishonest or illegal method.
- (3) Do not destroy reputation of trade competitors by slandering them



Code of conduct for society and environment

- (1) Be responsible for environment, traditions, local customs of the place where the company is located.
- (2) Support and encourage the effective use of resources to reduce effects to the society and environment.
- (3) Raise awareness of social and environmental responsibility to employees
- (4) Quickly and effectively respond to the incidents which affect the environment and community due to the company operation by fully collaborating with government officers and related agencies.

Article 3. Personal Conduct and Our Work Environment

Basic mission

The company shall be aware that the work environment in which conduct, safety, and respect are observed starts from all employees. Therefore, employees shall be responsible for their own actions and conduct business with integrity and ethics. Employees shall strictly comply with the policy in “**Ethics and Work Practices**” manual, failing which employees may receive disciplinary actions.

Code of practice

1. Employees shall honor, collaborate, and assists customers, contractors, or partners, contractual parties, other employees, and the general public.
2. Employees shall not insult, slander the company or other employees and shall not falsely claim that they represent the company and other employees for personal benefits.
3. Employees shall not insult, despise threaten, discriminate, sexually harass, or molest other employees or any persons whom they contact for business.
4. Employees shall not smuggle, search, use, or disclose records, funds, property, or information of the company whether it is proprietary or not unless permitted by the superior.
5. Employees shall not use resources or funds of their colleagues and customers, search, use, or disclose information or details about other employees or the third party such as partners and customers who contact the company with trust.
6. Employees shall not intervene, eavesdrop, pry, or record conversations, transmit data, or voiceless contact, or disclose information or statements on the phone or communication devices of the customers or companies unless the customers or companies give consent or the law requires so.
7. Employees shall not behave illegally or dishonestly or fraudulently.
8. Employees shall not drink alcohol or take illegal drugs or be under influence of alcohol while working.
9. Employees shall not sell, use, possess, distribute, or produce narcotic drugs or illegal controlled substances.
10. Employees shall not give false statements or health information for absence.
11. Employees shall not possess, hold, use firearms or any weapons while staying at the company area or while working for the company.

12. Employees shall not gamble at the company premises or while working for the company.
13. Employees shall not use the company's resources and work hours to do other business.
14. Employees shall not accept or make the customers, partners, or contractual parties to understand that they must give gratuities to employees. If customers or partners offer gratuities, employees shall politely refuse and say that it is against the company policy.
15. Employee shall always wear the employee badge while being at the company premises and shall show this badge to customers when representing the company at customer site.
16. Employees shall respect, obey, and honor the superiors.
17. Employees shall not take side and shall build relationship with colleagues.
18. Employees shall work honestly and prioritize their duties.
19. Employees shall improve their knowledge of work and duties.

Clause 1. Harassment

Employees shall maintain work environment to be free from harassment as it destroys and reduces work potential. Harassment includes sexual harassment which is illegal, so employees shall be responsible for their behaviors and shall not allow other to harass them.

Code of practice

1. Employees shall honor others and avoid doing anything to ridicule, insult, threaten, coerce, or bluster.
2. Employees shall not provoke, slander, or mock others which may lead to disharmony.



Clause 2. Sexual Harassment

Definitions

“Sexual Harassment” means any action or behavior that shows or makes other understand that sexual relation is being offered, which influences the decision-making in relation to personnel management, including hiring, performance assessment, pay raise, career advancement, assignment, work scheduling, employment condition, or professional development, sexual discrimination, and sexual harassment at work.

Examples of sexual harassment are unwelcome courtship, use of sexual words or gestures, display of things, images, or anything in the way that invites sexual relation.

Code of practice

Employees shall not do anything which is considered sexual harassment. If sexual harassment is known or found, it must be reported to the superiors without delay.

Clause 3. Non-Discrimination and Equal Opportunity

Employees shall always be aware that for the business to succeed, value must be accepted and competence must be promoted equally. Employees shall create and maintain harmony at work and do the same to all partners under the company policy and applicable laws.

Definitions

“**Discrimination**” means unfair treatment of others using personal discretion or relationship regardless of knowledge and ability to work.

“**Equal Opportunity**” means giving the same opportunities regardless of age, skin color, race, nationality, disability, sex, religion, origin, marital status, sexual orientation, or social status.



“**Employment Requirements**” include recruitment, permission to take leave, employment benefits, compensation, promotion opportunity, transfer, performance assessment, training, dismissal and re-employment, participation in social activities and recreational activities, compliance with the rules, termination of employment, etc.

Code of practice

1. Employees whose duty is to select the candidates shall consider knowledge and abilities without employment discrimination and shall not do anything which affects the employment status of colleagues or prospective employees.
2. For business dealing, employees shall not discriminate customers, suppliers, competitors, government officials, or other persons, which is illegal.
3. Employees shall support the disabled persons, women, minors, veterans, or others to have equal opportunity in job application or dealing with the company.

Clause 4. Personal Interests

Outside Activities, Financial Interests, Personal Relationships, and Conflict of Interests

The company encourages employees to participate in any activities which give personal benefits to employees outside of their work. At the same time, employees shall be aware that such activities shall not affect work or unbiased decision and shall be in accordance with the company objectives. If any conflict of interest occurs, the company work and employees may be in trouble, leading to low quality service. The company business will be outstanding if employees focus on the benefit of customers, shareholders, and the company. Therefore, abuse of power and authority must be avoided.

Definition

Conflict of interest means any activities causing conflicts between the employees’ personal interest and the company’s interest, which may lessen efficiency and cause bias at work. Personal interest may include activities or external activities, financial benefit, or personal relationship.



- Employees' personal activities
- Activities of the families or family members which may influence the decision for business benefit of the company
- Activities of the persons having close relationship or personal relationships with the employees which may influence the decision for business benefit of the company

Code of Practice

The employees shall not conduct any business which may cause the conflict of interest with the company, whether directly or indirectly. The employees shall not use their opportunities received from their positions to seek benefit for themselves and their friends and shall avoid initiating any transactions which may have the conflict of interest that influences the decision, including conducting any business in the name of the employees themselves or the juristic person in which they have interest.

Clause 4.1 Outside Activities

Code of Practice

1. To avoid conflicts between personal interest and company interest, employees shall not be hired to provide consultations or assistance to the companies or organizations which are the company competitors.
2. Employees shall not use the company resources (e.g. property, time, data, record, intellectual property, or proprietary data, computer software, and company name) to do outside activities without approval from the authorized person.
3. Employees shall be approved by the higher-ranked person or officer supervising "work ethics and practices" before exercising powers as employees of the company in doing outside activities or business.
4. Employees shall not use the company resources (e.g. property, time, data, record, intellectual property, or proprietary data, computer software, and company name) to do outside activities without approval from the authorized person.
5. Employees shall be approved by the higher-ranked person or officer supervising "work ethics and practices" before exercising powers as employees of the company in doing outside activities or business.



4.2 Financial Interests

Code of Practice

1. When directors and employees at management level (as defined by the requirements of SEC), spouse, or legitimate minor child trade or invest in the company stocks, it shall be reported to the Company Secretary Department immediately.
2. Employees shall not offer or accept personal loan offer, guarantee, discount, or benefits from suppliers and competitors of the company.
3. Employees shall not force or pressure colleagues to financially support political organization and shall not use the company resources for such activities.

4.3 Personal Relationships

Code of Practice

1. Employees shall avoid the chain of command with their family members whether directly or indirectly.
2. Acceptance of new employees or transfer of employees who are family members or close relatives of employees, including spouse, child, siblings, etc., to work in the chain of command shall be transparent and in accordance with the company policy.
3. Employees shall differentiate relationship between family members or close relatives from assigned missions in assessment, promotion, decision on remuneration, and employment plan.
4. Employees shall not collaborate with their family members or close relatives in doing business which may have conflict of interest with the company. To avoid problems, employees shall disclose relationship of their family members or any persons who may cause conflict of interest with the company to the superior.

Code of Practice

Employees at management level shall declare in the questionnaire on conflict of interest as determined by the company or when the conflict of interest with the company occurs.



5. Employee Privacy

Employees shall respect privacy of each other and shall not breach the privacy of their colleagues since it may cause disharmony and affect work efficiency. Employees shall understand that normally the company does not inspect personal communication, use of computer, and shall not search employee work place. However, the company may do so at any time to protect its benefit.

Code of Practice

1. Employees shall search or use personal data of other employees for the company business only upon approval.
2. Employees shall disclose personal data of other employees to the extent permitted only and shall disclose it to the assigned person for the business benefit under the company policy or under the laws.
3. Employees shall collect personal data of other employees as necessary for effective business operation only.

Remarks:

In some occasion, it may be necessary for the company to search the employee workplace to ensure safety of life and property of other employees and the company. The company reserves the right to search the company property at any time, including workplace, tables, cabinets, vehicles, email, voice mails in computers, diskettes, and telephone logs of the company, as well as the property used for communication outside of the workplace.

Normally, the company shall not involve in personal behaviors outside work hours unless it adversely affects work and destroys the company reputation or benefit.

6. Workplace Safety

Alcohol and Drug Use, Workplace Violence, Weapons

Health and safety of employees, customers, partners, contractual party, contractors, and visitors may be prioritized. Employees shall consider effects of daily work on the company operation and avoid getting involved in the risky situations without acceptable reason. Moreover, employees shall feel safe at work or while working. Therefore, all employees shall pay attention to work safety.



Code of Practice

1. Employees shall comply with regulations on work safety of the company regarding the use of tools, equipment, and work environment. In addition, employees shall not use or assign other people to use the equipment without training.
2. Employees shall use personal protective equipment as required by the company.
3. In case of possession of hazardous substances, employees shall manage, keep, and use those hazardous substances in accordance with the company rules and applicable laws. Employees shall understand hazardous substances they use.
4. Employees shall report their superiors and the agency supervising work environment and safety of unsafe condition or actual or possible danger, including the unsolved case. Moreover, employees shall report accidents immediately as required by the law, especially the accident which result in body injury.
5. When the health and safety official of the government agency contacts and requests for inspection of tools, venue, and work process, employees shall notify the assigned unit of the company to coordinate and make appointment. Upon inspection, employees shall collaborate with the official.

6.1 Alcohol and Drug Use

Employees shall work effectively when their brain is clear and they can act quickly. Being under the influence of alcohol or drug or inappropriate use of drug may reduce work ability. This behavior may damage the company reputation and result in criminal case.



Code of Practice

1. Employees shall not work while being under the influence of alcohol or illegal drug or controlled substances.
2. Employees shall not drink alcohol during work hours since It may be dangerous for themselves and others, as well as damaging reputation of the company and employees.
3. Employees shall not possess, sell, use, produce, distribute illegal drugs or controlled substances.
4. Employees shall not work while being under the influence of alcohol or illegal drug or controlled substances.
5. Employees shall not drink alcohol during work hours since It may be dangerous for themselves and others, as well as damaging reputation of the company and employees.
6. Employees shall not possess, sell, use, produce, distribute illegal drugs or controlled substances.
7. While working, employees shall not drive or travel with the company vehicle or their own vehicles while being under the influence of alcohol or illegal drug or controlled substances. In addition, employees shall not keep alcohol or illegal drug or controlled substances in the company vehicle.
8. While working, employees shall notify their superior of any drug or legal substance they use (if any) which may cause them and other unsafe.

6.2 Workplace Violence

Code of Practice

1. Employees shall not harm, intend to harm, or threaten other employees or people.
2. Employees shall report to their superiors, security unit, and Human Resources Department when any violent action or behavior which may harm health or life of other is found to prevent workplace violence.

6.3 Weapons

Code of Practice

Employees shall not bring weapons to the workplace, in the company vehicle, or while working unless permitted by the company and authorized persons according to the law.



7. Environmental Protection

Code of Practice

1. Employees shall work while maintaining the environment.
2. Employees shall comply with the regulations on environmental conservation when using the equipment or work.
3. Employees shall comply with the law or company policy on toxic material or waste management.
4. Employees shall comply with pollution control system.
5. Employees shall participate in the company project on environmental protection and conservation such as recycle project.
6. Employees shall consider environmental effects in purchasing such as toxic substance, expenses, and handling method, storage and disposal, as well as opportunity to reuse them.
7. Employees shall report to the environment, health, and safety division of the company in case of unsafe or dangerous condition occurs to the environment, health, or safety of employees, including spill, leakage, and other emergencies.
6. When government official or related officer contacts and requests for information or inspection of environment, employees shall notify the assigned unit of the company to coordinate and make appointment. Upon inspection, employees shall collaborate with the official.



Article 4. Protecting Our Company Assets

1. Property

The company is trusted by the shareholders to manage the company property with appropriate methods such as acquisition, possession, and disposition or transfer since it affects the financial success of the company. Therefore, employees shall utilize the company property efficiently and effectively and shall maintain it properly.

Examples of the property are real estate, materials, tools and supplies, inventories, spare parts, funds, systems and computer equipment, computer software, vehicles, records or reports, property and proprietary information, intellectual property, confidential information, trade secret, emails or voice mails, etc.



Code of Practice

1. If the company property is damaged, employees shall report to the relevant persons for repair.
2. Employees shall not take, use, sell, borrow, lend, or dispose or transfer the company property without permission regardless of value of form of the property.
3. Employees shall not intentionally damage, sabotage, or destroy the company property.
4. Employees shall protect the company property from robbery, misuse, destruction, or sabotage, as well as comply with the relevant requirements.
5. Employees shall not use the company property for personal benefit or outside activities which are not related to the company business unless permitted by the superior.

2. Funds

The company funds shall be managed effectively to maintain sufficient financial position of the company to achieve the target and prevent misuse of the funds and corruption. Therefore, employees shall manage the company funds with care as if it were employees' money and comply with the code of conduct for efficiency and the utmost benefit.

Definition

Company fund means cash, check, financial instrument, document or record with financial valuable, including the items equivalent to the financial documents or records.

Examples of funds are cash, check, credit card, trade account receivable, trade account payable, voucher, receipt, money order, postage stamp, beneficiary form, right to rebate, list of returned goods, expense, financial instrument, etc.



Code of Practice

1. Employees shall protect the funds and comply with the policy on fund security.
2. Employees shall collaborate in spending the funds or advance payment of the company to gain the highest return.
3. Employees shall record fund transactions and related transactions correctly and honestly. Employees who have approval power shall check whether the records have been prepared honestly and in timely manner. Spending of funds shall be appropriate and in compliance with the rules.
4. Employees shall not spend the funds in the company business without approval.
5. Employees shall not spend the company fund for personal interest.

3. Records

The information recorded by employees reflect employee performance and create advantage in business operation. Complete, correct, and accurate information shall help smoothen the operation, save money, and determine business strategies. Moreover, for the shareholders, this information reflects employee efforts in working with care and ethics. Many laws determine serious punishment for misuse of the information, incorrect record, and failure to record essential information in the company record. Therefore, incorrect record shall result in disciplinary actions.

Definition

Company records mean information or knowledge that the company obtains from acquisition, production, procurement, report, or other methods, including the information or knowledge developed while employees are working for the company.

Example of records include reports, time attendance, disbursement form, beneficiary forms, invoice, wage payment records, resume, customer background, proprietary or confidential information, confidential information regarding national security, assessment and operating result records, and other information recorded in computer or in document, etc.



Code of Practice

1. Employees shall prepare records of the company correctly and accurately.
2. Employees shall not intentionally make false or erroneous reports or records and not conceal or present false or erroneous information to the company. If any false or erroneous information is found, employees shall report the management.
3. Employees shall not change the records without official approval.
4. Employees shall make or prepare the company records in compliance with applicable domestic and international laws.
5. Employees shall maintain the records in accordance with the laws, company policy and business necessity.
6. Employees shall protect and keep personal data and proprietary information related to employees, customers, partners, contractual party, and co-investor confidential when processed unless it is disclosed to the persons permitted to use the data and for the relevant benefit only.
7. If employees finds errors in the documents and account, the superior shall be reported immediately and correction shall be made under the superior order by giving credit, rebate, or other methods as mutually agreed.

4. Time

Correct records of time and efficiently use of time are important for customers and shareholders as it reflects the difference between average level of work and excellent level of work, resulting business advantage. If employees efficiently spend time without letting external interest intervene them during work hours, the company shall be more competitive in comparison with competitors.

Definition

Work hours mean the period spent for work, business trip, business activities, or representation of the company.

Code of Practice

1. Employees shall spend work hours efficiently and effectively as determined.
2. Employees shall record their work hours correctly and accurately.
3. Employees shall comply with the policy on work hours.
4. Employees shall not do anything or invite colleagues to spend their work hours for other activities which are not related to the company business.

5. Intellectual Property

Concepts, ideas, and other information invented or discovered by employees shall be valuable property of the company. These are the heart of innovations and enhance new business opportunity. If employees fail to protect this intellectual property, the company shall lose its titheship and business advantage.

Examples of intellectual property include patented and unpatented technology, trademark, trade secret, copyrighted data, etc.

Code of Practice

1. Employees shall protect the intellectual property of the company and not disclose it without approval.
2. Employees shall protect the intellectual property without improper or illegal methods. Upon using the intellectual property, seal or trademark or service mark or copy right mark shall be checked, including the use of ®, TM, © (1999),  etc.
3. Employees shall notify the company of discoveries, inventions (e.g. computer program, technological inventions), proprietary data which have been developed while employees are working for the company or using the company resources.
4. Employees shall assist the company to obtain patent, copyright, or protect trademark which is the intellectual property of the company.



6. Proprietary Information

Proprietary information is important for business strategies as well as the intellectual property. Therefore, employees shall be aware that most information developed by the company or possessed by the company is confidential and shall not be disclosed without permission. Utilization and storage of the data shall be conducted carefully to create advantage and ensure that the company is the leader in the market.

Definition

Proprietary information means the information owned or controlled by the company, which

- Has economic value for the company at the present and in the future
- May be beneficial for the competitors if disclosed
- Are known by a limited number of people and not publicly disclosed.

Examples of proprietary information include invention, program, method, technique, discovery, development and creation, research, data of customer and employees, construction plan, strategies, information about new products and services and other technology, business and marketing plan, sale and marketing information.

Code of Practice

1. Employees shall handle, store, and itemize the proprietary information as required by the company.
2. When employees dispose of or circulate the proprietary information to others, a written approval must be obtained from the superior and legal agencies. Employees shall also comply with the confidentiality agreement.
3. In negotiating about the proprietary information, employees shall be careful not to allow any person hear, eavesdrop, or record the conversation. The negotiation shall not occur in the public place, via all kinds of communication devices, or with family members which may lead to disclosure.
4. Upon dismissal from the company, employees shall not disclose or bring the proprietary information with them.
5. Employees shall accept the proprietary information and/or confidential information from the person who is permitted to disclose it after they obtain permission from the superior and legal division only. If this information is obtained from the competitors, police report shall be filed immediately.
6. Employees shall accept and/or use the proprietary information of the competitors only if it is generally disclosed information, legal information, or information with written consent from the competitor company.
7. Employees shall obtain permission from the Board prior to entering into confidential agreement or non-disclosure agreement.

7. Inside Information/Insider Trading

Insider information is important for business as the company can use this information to evaluate the business opportunity and future profits. However, improper use or dissemination of insider information may damage the business strategies of the company and ruin advantage in business negotiations, leading to loss of good opportunity in improving service. Moreover, the rules of SEC and regulations of SET indicate that using insider information for stock trading or transmission of insider information to others for such purpose is illegal.

Definition

Insider information means the information which is not publicly disclosed and influences the decision to sell or buy stocks of the investors or other means related to stock trading of the relevant companies (e.g. exercise of right to convert stocks).

Examples of insider information include the information which has not been officially announced, announcement of dividend, stock issuance or redemption plan, operating result report, negotiation for merger, negotiation on joint venture, and negotiation on contracts, as well as other transactions and agreements of the company which have not been publicly disclosed.

Code of Practice

1. Employees shall not disclose the insider information related to the company or other companies to the persons who are not authorized to know under the regulations or business agreements.
2. In negotiating on the insider information, employees shall be careful not to allow any person hear, eavesdrop, or record the conversation. The negotiation shall not occur in the public place (e.g. in taxi, meeting room, trade fair, elevator, restaurant, toilet, golf course) or via all kinds of communication devices.
3. Employees shall not disclose the insider information which has not been publicly disclosed.
4. Employees shall not use the insider information of the company or other companies for stock trading and shall not transmit the information to others for stock trading.



8. Communications and Computer Systems

Technology is the heart of the company business. Customers do not only expect to receive quality service but also expect that their personal data will be protected. The communication system and computer system are important for the company business, and it plays a key role in global communication and national security. Therefore, the company success depends on effectiveness of protection and appropriate application of communication system and computer system.

Examples of communication system and computer system include communication devices such as telephone, voice mail receiver, fax and pager, computer and computer network system, exchange equipment, inputs such as ID and password, authentication device, pass and password to enter the building.

Code of Practice

1. Employees shall maintain confidentiality and completeness of communication system and computer system, ID and password, technology and data of the company, and shall not apply this technology without permission.
2. Employees shall use communication system and computer system responsibly and shall not cause disharmony, damage to others, discourage others, or instigate hostility at the workplace.
3. Employers shall not use communication system and computer system to do illegal activities or in the way that violates the company policy. Employees shall not use internet or other similar services to cause damage, embarrassment, lack of reliability, or loss of reputation to the company.
4. Employees shall use communication system and computer system of the company for business purpose only. However, the personal use from time to time (e.g. telephone, receipt of voice mails, emails, fax, internet for personal purpose) may be allowed if permitted by the superior. In addition, such use
 - Not affect their assigned work and the company business.
 - Not related to special business or activities or related to other organizations (including invitation or sale promotion or politics or religion).
 - Not cause unacceptable expenses to the company.
 - Not breach this code of conduct or the company policies and rules

5. Employees shall record only correct and true information in communication system and computer system of the company.
6. Employees shall search, use, change, copy, delete, or destroy the proprietary information when permitted only.
7. Employees shall keep information recorded or used through communication system and computer system confidential and shall use the information (e.g. information obtained from the customer telephone, employee background) when permitted by the superior specifically and as necessary for the business to the extent permitted by the law only.
8. Employees shall protect confidentiality of the company (by encoding technology) transmitted to public network (e.g. internet) to avoid leakage of confidential information of the company.
9. Employees shall check software, diskette, and new folders received through the public network (e.g. internet) by using the anti-virus program before installation or use.
10. Employees shall use the licensed software program and employees may use the software program or shareware for free when permitted by IT Department only.
11. Upon temporary pause of computer use or employees are not working, for safety reason, employees shall log out or use the code to prevent unauthorized access from others.
12. Employees shall follow up and comply with the policy and regulations of the company related to security of the communication system and computer system network on regular basis.
13. Employees shall not favor or ignore any persons who may seek benefit or access or disturb the computer system or traffic system of the company illegally or without permission from the company or voluntarily support or allow such action to occur or exist or support or allow illegal actions under the law on computer, copyright, and other relevant laws.
14. Employees shall not use communication system and computer system for personal purpose through social media program (social media platforms) such as Facebook, Line, etc., or send inappropriate email or post improper messages which may be considered as criminal offence.

Remark

The company reserves the right to supervise the use of technology, including computer network, email, or voice mail to ensure correct use, authorized access and use of the system, and for the business purpose of the company.



9. Affiliate Transaction

While the company and employees benefit from formation of the Group, the company has the standards that can build trust among customers, partners, and competitors. Also, the company is certain of equal opportunity in the market. Therefore, allocation of expenses related to the intercompany transactions shall be correct and transparent.

Code of Practice

1. Employees shall make sure that the company conducts legal business which shall be beneficial for the Group and in line with the business strategies or financial return.
2. Legal intercompany transactions shall have the solid pricing as evidence.
3. In making intercompany transactions, work hours payment and other related expenses shall be recorded correctly and accurately as required by the law.

10. Espionage and Sabotage

The company property may be misused or destroyed by competitors or other persons who attempt to destroy the company business and reputation. Therefore, the company shall have the measures to prevent espionage and sabotage for customers to rest assured that they will receive continuous service without intervention, and the service will become more effective in the future.

Examples of espionage and sabotage include computer password, security measure, location of installation of system and equipment, circuit details, service system restoration process, and conversion of transmission route in case of emergency. Confidential information and national security information, technical data, marketing research data, product development data, business plan, marketing plan and strategies.

Code of Practice

1. Employees shall use and allow others to use the company data and property only when permitted and for the business purpose of the company only.
2. Employees shall not allow any unrelated persons to access the area where confidential information is kept. Employees shall keep such information in safe place with strong security system after use.
3. Employees shall report their superior immediately if there is an unauthorized person trying to access the confidential information or prohibited area of the company.



11. Reputation

The company reputation for providing quality service and treat customers fairly. Therefore, the company has employees who are skillful in many fields, has loyal customers, and is accepted by the supervising government agencies, shareholders, and creditors. All of these help the company succeed in business. Nonetheless, the reputation which has been built with great efforts may disappear quite easily because of some improper actions. Doing business with others is always a good opportunity to build positive image of the company. In addition, the continuous use of company symbol can promote the company logo and reputation in the competitive market. If these activities lack continuity or completeness, the company logo and symbol may lose their recognition and be forgotten by the public. Therefore, the future success of the company depends on employee attempts to maintain the company reputation.

Code of Practice

1. Employees shall use the company logo and symbol correctly and shall prevent improper or unauthorized use of property. The responsible unit shall be reported in the case that any misuse or improper use is found.
2. For circulation of information to the public, employees shall comply with the policy on status and internal activities of the company.
3. For issuance of certificate or sale promotion in the name of the company, employees shall be permitted by the division in charge of the company image only.
4. Employees shall clearly show that what they say or write which is unrelated to the company business is not the opinion or action made in the name of the company.
5. Employees shall dress or wear uniform indicated by the company and shall not wear any outfit showing that they are the company employees to enter amusement places unless the purpose of doing so is for work.
6. Employees shall not do anything which causes damage to the company or endangers colleagues or themselves whether voluntarily or by negligence.



Article 5. Customer Relations

Customer is the person who uses the company service in exchange of the service fee. Building good relationship with customers means retention of customers with satisfaction of the products or services. Employees shall treat all customers as “patrons”. Any action of employees which may affect customer dissatisfaction, causing them stop or reduce their use of products or services of the company and shift to competitors or spread their unpleasant feelings to the public shall damage the company “image”. Therefore, employees shall build and maintain good relationship with all customers by complying with the ethics and practices for work.

1. Knowledge/ Skill

Code of Practice

1. Employees shall have good knowledge and understanding of the company products.
2. Employees shall thoroughly study and understand customer needs prior to offering them products or services to make them fully satisfied.
3. Employees shall provide correct and complete information to customers.
4. Employees shall always be responsible, seek knowledge, accumulate work experience to enhance customer or service receiver satisfaction.

2. Quality and Productivity

Code of Practice

1. Employees shall present products and services having the quality and standards as specified by the company.
2. Employees shall treat customers politely, honor them and speak to them politely as specified by the company
3. Employees shall provide service honestly and fairly without taking advantage of or cheat customers.
4. Employees shall be punctual and keep appointment with customers.
5. Employees shall try to provide service beyond customer expectation.
6. Employees shall provide reliable and trustworthy service. They shall adhere to and follow the promise made with customers. If such promise cannot be kept, employees shall report the superior for seeking appropriate solutions.



7. Employees shall have good personality, dress as determined by the company or suitable for their job and occasion, clean and polite. Also, their workplace shall always be clean and tidy.

3. Attitude and Manner

Code of Practice

1. Employees shall have positive attitude toward customer service job, put importance on the service and full efforts on work, which shall lead to valuable and effective service.
2. When customers have problems or complaints, employees shall pay attention and listen to customers with care. Employees shall actively offer some help to impress customers.
3. Employees shall not express impolite manner to customers, or fight or argue with customer, or express negative emotions such as tiredness or aggressiveness, or ignore customers, or express rudeness.
4. Employees shall respect the decision and opinion of customers.
5. Employees shall not offer or demand compensation from customers apart from those indicated in the company rules.
6. Employees shall not breach customer privacy.
7. Employees shall not infringe customer property by robbery, breaking, or damage.
8. Employees shall not contact customers for other purpose except for the mission assigned by the company.

4. Communication

Code of Practice

1. Employees shall always express themselves as the company employees when meeting or having conversation with customers e.g. employees ID, business card, uniform, or verbal introduction.
2. Employees shall present the information or suggestions obtained from customers to the superior and may give opinions for work improvement for the benefit of the company.

Article 6. Fair Dealings with Others

1. Customer Privacy/Privacy of Communications

As the company provides service related to personal life to work life of customers, customers entrust us with their information, records, and communication data. For this reason, the company is responsible for strictly maintaining customer privacy as expected. Seeking new customers while retaining existing customers depends on effectiveness of data maintenance and appropriate communication. Therefore, the company is required to develop specific standards to take care of, protect and communicate with customers up to the customer trust.

Code of Practice

1. Employees shall maintain customer privacy and data without involving in or intervening communication or transmitting any data unless it is done under the legal order.
2. Employees shall use information about customers for business purpose only. If customers give personal information, employees shall not use their information, purchase order, work process, or customer service for marketing purpose or sale purpose of the company.
3. Employees shall view data of the customer and their family members, friends, or other employees of the company when permitted by the superiors determined by the company only.

2. Suppliers and other Representatives

Suppliers, consultants, dealers, and other representatives are important for the overall success of the company. Therefore, they are valuable partners. For the company to buy products at fair and appropriate price and receive quality service, the company shall make the partners want to do business with the company by creating good relationship, being honest and reliable. To retain good suppliers, employees shall treat them in the same manner as the company wish to be treated by suppliers.



Code of Practice

1. Employees shall review and comply with the policy on procurement of products and services of the company, as well as seeking appropriate plan before selecting suppliers, consultants, dealers, and other representatives.
2. Employees shall make written contracts or agreements indicating details of work and duties and responsibilities of the parties. The contracts shall be sent to the legal department for review before signing.
3. Before doing business together, employees shall inform suppliers, consultants, dealers, and other representatives of their duty to comply with the culture and code of conduct of the company, as well as applicable laws, regulations, and policies. In addition, employees shall obtain more information about the products and services from the purchasing department of the company.

3. Creditors

Support and trust from creditors are very important for the company to create stable financial foundation. The company has the policy and mission to treat creditors equitably and fairly, give them true and updated information, as well as strictly complying with commitment.

Code of Practice

1. Employees shall adhere to honesty in complying with the conditions established by the company for all types of creditors, subject to applicable laws and regulations.
2. Employees shall ensure that the company discloses correct and complete financial information, as well as paying debts when due.
3. If there is any problem causing it impossible to perform as planned, employees shall notify creditors of such problem immediately to seek mutual solutions.
4. Employees shall take care of the collateral quality.

4. Investors

Investors are another group who plays a key role in ensuring the company existence. They are part of fund raising for successful business expansion. Continuous investment of the investors reflects their trust in the company.



Code of Practice

1. Employees shall conduct business with knowledge and management skills. They should have integrity and fairness to both majority and minority investors for the utmost benefit of investors as a whole. Employees shall be responsible for investors regularly, aiming at building business growth for long-term competitiveness and appropriate return for investors.
2. Employees shall ensure that the company disclose financial and non-financial information as required by SET in correct, complete, timely, transparent, and equitable way to all investors.
3. Employees shall not seek benefit for themselves or the third party without using the company information which has not been publicly disclosed.

5. Fair Competition

The company has the mission of trade competition while strictly complying with the law by offering quality products and service, trying to maintain trust of customers, suppliers, and competitors. The company conducts business based on moral and ethical principles. Business operation shall be in compliance with applicable laws and regulations. Employees have the duty to learn the company standards, applicable laws, and the laws to be enforced in the future which may affect their work.

Code of Practice

1. Employees shall promote the sale of products and service of the company by fairly comparing them with competitors' products and service without distorting facts or slandering competitors' products and service
2. Employees shall not take part in espionage, sabotage, or bribery of existing and future competitors.
3. Employees shall not enter into contracts or agreements if such contracts or agreements unreasonably reduce or eliminate trade competition.
4. Employees shall give correct and true information about quality, capacity, properties, and readiness to sell products and service in the press conference, advertising, and public announcement.



6. Competitive Information

Collection of information about the market and products and service of competitors are necessary and appropriate. The company aims at competing fairly and avoiding making inappropriate agreement or memoranda. In compiling competitive data, the company shall comply with the laws governing the code of conduct and practices which are accepted in the business group.

Code of Practice

1. Employees shall gather data on competition from the following sources:
 - Known sources (e.g. published article, advertising, public information, newspaper, journal, and other public media)
 - Arrangement of trade and industrial activities (e.g. trade fair, conference, and other trade activities)
 - Research of competitors (In case of compiling data from research result of competitors which are disclosed to customers, when employees use such results, they shall not claim that the research is conducted by them).
 - Trade survey results by acceptable advisory board
 - Information made for customers and general public
 - Agreements made specifically with customers

2. Employees shall not seek trade secret of competitors or proprietary information of competitors illegally such as theft, espionage, or breach non-disclosure of competitors whether obtained from customers or other persons.



Article 7. Working with the Government

Definition

Government official means civil servant, employees, workers, group of people, or operators working in administrative agencies, quasi-judicial council, committee or persons empowered by the law to issue rules, orders or resolutions which affect people.

Government Relations

Dealing with government officials as customers or official person under the law influences continuous success of the company business. Therefore, employees shall avoid inappropriate actions or any actions to influence government officials, employees, or officers for acquire improper benefit, failing which the government officials, the company, and employees shall be punished under the laws. Employees shall study the laws, regulations, and standard of government operations and building positive relations on the basis of integrity, respect, trust, and code of conduct of the company.

Code of Practice

1. Employees shall study and understand the rules and regulations used as the basis of government operation both in written or non-written form.
2. Employees shall comply with the policies and measures of the company related to anti-corruption prescribed in Article 6.

Hiring of Government Official

Objectives

To ensure that the company select the personnel who have been the government officials in accordance with the rules to prevent any action which may be taken to acquire the interests and to ensure that the information is disclosed for transparency and verifiability.

Processes and Control Measures

1. Human Resources Department shall interview and examine the recruitment of the persons who have worked with the government agencies regarding any agreement which they might have made with such government agencies and comply with the company's rules.



1.1 The employees shall have never worked as the government officials unless they have retired for such work for at least 2 years prior to applying and being hired by the company.

This is to make sure that the company will not cause such person to breach the agreement which may lead to legal action.

2. The candidates who have been the government officials shall disclose the information and certify correctness of the information given to the company under Clause 1.



Article 7. Working with the Government and Revolving Door

Definition

Government Official means a government official, employee, staff, group of persons or persons working in an administrative agency, the Dispute Resolution Committee, Committee or person having law Give the power to make any rules, orders or resolutions affecting any person.

Government Relations

Dealing with a government official, whether the government is the client or the legal responsible person, have any significant to the continued success of the company's business. Employees are therefore advised to avoid any improper or influencing actions to expect the benefits that should not be obtained from government agencies, officials, Government officials and employees. Failure to do the above may make government officials Companies and employees are sanctioned in accordance with the provisions of the law, so employees are advised the laws, regulations and standards of practice of government agencies and should build good relationships based on Company's Code of Conduct.

Code of Practice

1. Everyone has to study and understand both written and non-written rules that are the basis for working with the Government.
2. Everyone has to comply with the Company's policies and measures regarding anti-corruption which is set out in Article 6.

Revolving Door

Objective

To ensure that the Company has selected personnel who have been government employees in accordance with the criteria set by the Company in order not to use such actions as compensation for obtaining any benefits and information is disclosed for transparency and can be audited.



Code of Practice

1. Human Resources Department interviews and reviews the hiring of people who used to work with government agencies regarding agreements that made with government agencies and in accordance with the rules that the Company's conditions.

- 1.1 Not being or used to be a Government employee unless they have retired from the aforementioned characteristics for at least 2 years.

In this regard, the company will not take any action to cause that person to act in breach of the agreement which will result in litigation proceeding.

2. The applicant has to disclose information and certify the accuracy of information provided to the company in accordance with Clause 1.

Article 8. Anti-Corruption

The company business operation with relevant parties shall be done correctly, straightforwardly, transparently, honestly, verifiably, and without corruption by strictly complying with applicable laws and anti-corruption policy. All kinds of corruption are **prohibited and unacceptable**. Therefore, directors, management, and all employees shall not tolerate any kind of corruption, whether direct or indirect, for the benefit of self, families, friends, or acquaintances. Bribery is prohibited in all kinds of business dealings.

Definition

Corruption means the exercise of power acquired by position to seek interest, bribery in any form by offering, promising, giving, committing, as well as claiming or accepting money, property or other improper benefits to the government official, public organization, private entity, or the persons in charge whether direct or indirect, to persuade such person to perform or omit performing for acquiring or maintaining the business or introducing the business to any specific company, or for acquiring or maintaining other interests which are not suitable for the business or creates any wrongful interest to oneself or other unless it is the case the law, rules, notifications, regulations, or local customs or traditions, or trade norms allow to do.

Code of Practice

1. Refuse corruption and be careful of high-risk work process such as sale and marketing, purchasing, investment project with contract, giving and receiving gifts, entertainment, donations, or sponsorship.

2. Do not ignore or remain indifferent. If any actions which may be corruption related to the company are found, the superior or the person in charge shall be reported. Employees shall fully collaborate in investigation of facts.
3. Make sure that giving or receiving donations or funding is transparent and correct in accordance with the company rules and applicable laws and make sure that donations and funds shall not be used for bribery.
4. Be careful of making transactions with juristic persons or organizations who are doubtful about corruption.

1. Political Support

The company is politically neutral and will not do anything which reflects its favor or financial support or any kinds of supports to any political parties, political alliances, political authorities, or political candidates, whether directly or indirectly, at local, regional, or national level. However, the company respects the political rights of the employees as good citizens under the constitution, including the right to vote, election, or application for political candidacy.

Definitions

Political support means giving support to politicians or political parties in both monetary and non-monetary form, including lending or donating equipment, providing technological service without any charge, or encouraging the employees to take part in political activities in the name of the company to gain business advantage.

Code of Practice

1. Everyone has the right and freedom in participating in political activities under the constitution. However, such action shall not be performed under the company's name and the position, funds, time, materials, equipment, or facilities of the company shall not be used for political purposes or to favor and support any political candidates or organizations for personal interest.
2. The employees shall not express their opinions regarding the public matters which may make people think that the company involves, favors, or supports political activities, political parties, political alliances, political authorities, or political candidates unless the employees are officially assigned by the company to do so.
3. The employees shall not wear employee uniform or use any symbol which may make people think that the employees participate in the political meetings or gatherings in public places which have the political nature.

4. The employees shall avoid expressing their political stance or opinions at work or during work hours to prevent conflicts at work.
5. No one should force their colleagues to support political campaign of any political party members, political parties, or political committees.

2. Charitable Donation and Sponsorships

Charitable donation in the form of financial support or in other forms, including giving knowledge or time and providing financial support for business promotion and building positive image of the company shall not adversely affect the business decision of the company. Financial support is a way to promote business which is different from charitable donation. It can be done to promote business, brand, or reputation of the company.

Code of Practice

- (4) Giving or accepting donations shall be made transparently for the benefit of the society or in accordance with the Corporate Social Responsibility (CSR) principles with the clear processes and disbursement control. Audit shall be conducted to make sure that it is a charitable activity with appropriate approval process to ensure that the charitable donation will not be used as an excuse for corruption.
- (5) Donation shall be for charitable purpose. It shall not be related to reciprocal benefit for any person or agency except for honoring purpose in accordance with the general practice such as affixation of logo, announcement of the name at the venue or in the promotional materials.
- (6) If all employees wish to take part in the charitable donation or give financial support in the company's name, such action shall be recorded by indicating the name of the agency or the person accepting donation or support, objectives of the donation or support together with documents in request for approval from the superiors in the chain of command.
- (7) Charitable donation and financial support shall be made to the legal organizations and not to a natural person. Also, charitable donation and financial support shall not adversely affect the business-related decision.
- (8) Charitable donation and financial support shall be approved by the authorized persons determined by the company.



3. Prices of Gifts, Hospitality and Other Expenses

The company is committed to operate the business with integrity under the legal provisions and relevant rules to maintain the company's reputation. This includes exchange of business goodwill in certain occasions to express trust in doing business. Acceptance or giving of interests, including property, service, facilitation, or entertainment for relevant business parties shall be in accordance with the local or national custom and tradition, as well as the applicable laws. However, the company does not support acceptance or giving of gifts, property, or any other inappropriate interests which may affect the decision in performing duties and influence unfair decision or cause the company to lose its benefit or create the corruption risks.

Code of Practice

1) Entertainment, Gifts and Gratuities

Occasional exchange of business goodwill such as gift-giving, dinner, or entertainment are normal ways to express goodwill and build trust in doing business. However, the employees shall not allow these activities to influence their intention and decision. In the case that the employees carefully considers and take action without bias, entertainment and gift-giving should be appropriate, economical, and not too expensive. The employees are prohibited from demanding or accepting any gratuities.

Code of Practice

1. The employees shall not demand entertainment, gifts, or gratuities for themselves or others from the persons they are doing business with.
2. When the employees are required to involve in the process of selection of business partners, the employees shall not accept any entertainment, gifts, or gratuities which may influence their decision on selection of business partners or purchasing of these things. These include the employees whose duty is to oversee or influence or have power over the decision on entering into agreements with suppliers of products/services. Exchange of business goodwill with proper value shall be considered appropriate when it is made without any intention to influence the decision on purchasing or selling products.
3. The employees shall be informed of the goodwill exchange policy of the vendors and shall not make any offers which may conflict with the vendor's policy.

4. The employees shall notify the company's the goodwill exchange policy and standard of practice to the suppliers of products/services.
5. When the employees contact with government officials, the employees shall acknowledge and comply with the standards related to the goodwill exchange policy of both parties by adhering to the stricter standard.
6. The employees shall record and notify facts to their superiors. In the case that the employees, their family members, or dependents receive any gifts or goodwill from the company's vendors, customers, or competitors.

2) Entertainment

Examples of entertainments which are permissible provided they shall be appropriate and offered from time to time.

- Dinner
- Charity
- Sport event
- Holiday party or celebration
- Entertaining activities e.g. theatrical performances, movies, concerts, or festivals, etc.

Code of Practice

1. The employees shall obtain the superior's approval prior to inviting or accept invitations to join the entertainment.
2. The employees shall offer and/or accept entertainment which is the normal business tradition occasionally and appropriately provided such entertainment shall not influence the decision or improper action of the employees or vendors.
3. The entertainment which the employees offer or accept shall be reciprocal and appropriate to avoid possible commitment.

3) Gifts

Examples of permissible gifts

- Non-monetary gifts
- Promotional materials bearing the company logo (e.g. pens, caps, t-shirts)



- Giveaways (e.g. giveaways for employees or giveaways for vendor's customers)

Code of Practice

1. The employees shall give or accept the gifts that promote the reputation of the company and its vendors only, and the gifts shall not influence the decision on business/interests and shall not be any improper actions.
2. If it is necessary to have the business dealings in other countries or other cultures, exchanging business goodwill with high-value gifts are considered as good and appropriate business etiquettes. To give and accept such gifts, the employees shall report it to their superior for acknowledgement and record the gifts as the company's property.

4) Gratuities

Examples of permissible gratuities

- Cash or cashable things
- Loans
- Privileges
- Personal assistance
- Benefits
- Services
- Payment or assistance which can be considered as bribery or offering of interests

Code of Practice

The employees shall not demand, accept, or offer any gratuities or payments which are not in compliance with the rules. The employees shall be aware that accepting such gratuities, including money or special assistance, can be considered as bribery which is a breach of the company's policy, Thai law, and the law of other countries.

4) Facilitation Payment

Facilitation payment means the payment of a small amount of money to persuade the business unit with which the employees are in contact to rush the process or to ensure that any actions will be taken in accordance with such person's regular duties. The amount of this payment is higher than the rate determined by the law (if any).



Code of Practice

Facilitation payment is prohibited.

5. Measures to protect the persons refusing corruption

The company gives justice to and protect the persons refusing corruption by establishing the measures to protect the persons refusing corruption as follows:

1. The information shall be kept confidential without disclosure to any irrelevant persons.
2. The superiors shall not force or threat the persons whether directly or indirectly.
3. Such matter shall not be used to support the consideration of any punishment. The persons shall not be demoted or receive any negative results from refusing corruption in all cases although such refusal may cause the company lose its business opportunities.
4. If the superior of the person refusing corruption uses such refusal as an excuse to discriminate him/her, the company shall consider that the superior breaches the anti-corruption policy of the company, which shall result in appropriate punishment.

Article 9. Anti-Money Laundering

Anti-Money Laundering

Rules and laws on anti-money laundering are that the company shall not accept transfer or conversion of assets or support transfer or conversion of assets related to illegal acts to prevent the persons from using the company business to transfer, conceal, or obscure the origin of assets or use the company financial transactions for money laundering.

Definition

Money laundering means any actions taken to conceal obscure the true nature of acquisition, location, distribution, transfer, acquisition of rights related to offence to make it look as if the money or assets were legally acquired or unable to prove that it was acquired illegally.

Examples of money laundering

- Doubtful remittance of fund to overseas or from the country unrelated to the transaction
- Abnormally complicated structure of business deals
- Form of payment under the contract does not show the real objective or contains unusual payment conditions
- Request for remittance to unknown account
- Price paid by financial instrument which cannot identify connection to the payer unless it is the normal condition determined by the financial institution
- Partners or contractual parties are not willing to provide complete information or provide incomplete or incorrect information.

Code of Practice

1. Prior to making transaction with the other party on behalf of the company, employees should know about the origin of fund and check whether it is legal.
2. Employees should know that the other party operates legal business.
3. In case of payment made in cash or cash equivalents, employees shall have the document to confirm payment-receipt.
4. Do not transfer money to an unknown account or accept the transfer with unusual payment, especially from the country unrelated to the transaction.
5. Employees shall make the payment to the person who is the contractual party indicated as the payee under the contract. Do not pay through unclear person or channel unless it is in compliance with the law.



6. If any unusual transaction which may be considered as money laundering is found, employees shall report the superior or legal department immediately.



Article 10. Penalties

All employees shall acknowledge, understand, and strictly comply with the code of conduct and work practices of the company. Any person who breaches code of conduct and work practices shall receive disciplinary actions. In case of serious offence, employees may be dismissed from work under the work rules of the company or regulations, notification, or orders determined by the company. If the offence is illegal, legal action shall be taken against the relevant parties.

Article 11. Consultations and Complaints

The company has the Audit Committee and the unit to provide consultations and accepts complaints concerning moral and ethical issues. The complaints shall be accepted, compiled, and investigated. The committee in charge shall consider and decide on such issue. The information of the complainant, the complained person, the issue of complaint, evidence and witnesses shall be treated confidential. All relevant employees may file their complaint directly through the following channels:

1) Letter sent by post

Address to any of the following persons who accept the complaints

- Chairman of the Corporate Governance Committee (independent director)
- Chairman of the Audit Committee (independent director)
- Company Secretary

The letter shall be sent to the company's head office.

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1839,1839/1,1839/6 (8th floor), Phahonyothin Road, Lat Yao Sub-district
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2) Email

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