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Code of Conduct




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Code of Conduct


Jaymart Group Holdings Public Company Limited (the "Company") is firmly committed to conducting its business with integrity, transparency, and in accordance with the principles of good corporate governance, while recognizing its responsibilities toward society and all groups of stakeholders. Accordingly, the Company has established this Code of Conduct as the standard and framework for the responsibilities to be discharged by directors, executives, and employees at every level — from operational staff to senior management — without exception.

This Code of Conduct will be truly effective only when directors, executives, and all employees uphold and strictly observe its provisions, with due regard for the interests of the collective and of all stakeholder groups within the organization, in society, in neighboring communities, and in respect of the environment, alongside the conduct of business that aims to deliver sustainable returns.

The Company hereby promulgates this "Code of Conduct" to take effect with the Board of Directors, executives, and employees at every level of the Company, including its subsidiaries, associated companies, business representatives, and counterparties, who shall acknowledge and comply with the provisions herein.


Scope of Application

This Code of Conduct applies to all functions that operate, whether directly or indirectly, in conjunction with the Company. It covers subsidiaries, associated companies, business representatives, and counterparties, encompassing the Board of Directors, executives, and employees at all levels, and shall serve as the framework for joint operation to be strictly observed under the principles of integrity, good governance, and sound ethical conduct.

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Definitions

- Code of Conduct** : means the standards and good practices for conducting business that reflect the morality and ethics to be strictly upheld by directors, executives, and employees at every level as guidelines for performing their duties.
- Intellectual Property** : means works arising from human inventiveness, creation, and skill, which are products of the intellect and are legally recognized as proprietary.
- Money laundering** : means any act intended to alter the origin of funds derived from unlawful conduct, including by investing such funds in a lawful business or otherwise transforming them into apparently legitimate funds.
- Non-Discrimination** : means treating all employees at every level with equality, without distinction based on gender, sexual orientation, race, religion, ancestry, skin color, physical characteristics, social status, or disability, so that all persons receive equitable treatment as members of the organization.
- Occupational Health** : means the prevention of diseases, accidents, and hazards affecting employees, in order to ensure physical and mental safety together with an appropriate and sufficient workplace environment.

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This Code of Conduct comprises two parts as follows:

- Code of Conduct in Business Operations
- Code of Conduct toward Stakeholders


Code of Conduct in Business Operations

1) Corporate Responsibility

Directors, executives, and employees of the Company share the responsibility for driving the business to generate value and sound returns, in cooperation with companies within the Group, business partners, and new collaborations, on the principles of transparency and fairness. They shall further care for the Company's personnel in accordance with human rights principles and remain responsible toward the environment on an ongoing basis.

Good Practices

- 1.1. The Company places importance on building partnerships and new business collaborations to expand business opportunities, while selecting counterparties that uphold business ethics to the same standard as the Company.
- 1.2. The Company is committed to investments that deliver the best possible returns, together with transparent monitoring systems both within the organization and with partners or counterparties, which constitutes the responsibility of every director, executive, and employee.
- 1.3. The Company develops a Synergy Ecosystem among companies within the Group, taking into account operating methods, intra-group benefits, and sustainable performance, consistent with the Company's strategic objectives.
- 1.4. The Company gives priority to the selection of quality products capable of responding effectively to technological change, and gives due consideration to environmentally friendly products, in line with the Company's product sourcing process.
- 1.5. The Company is responsible for ensuring that employees at every level may work with the Company in good physical and mental health, by effectively managing occupational health and safety, and by adopting modern technology to enhance operational efficiency.
- 1.6. The Company is committed to the continuous development of its personnel and supports executives and employees at every level in performing their duties with mutual respect for human rights, through policies, communications, and internal activities as appropriate.

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2) Anti-Corruption

The Company is firmly committed to conducting its business with integrity, in accordance with the principles of good corporate governance, with responsibility toward society and all groups of stakeholders, by adhering to the guidelines set forth in the Company's prevailing Anti-Corruption and Anti-Bribery Policy. The scope covers the following matters.

2.1. Gifts, Hospitality, and Entertainment

The Company does not endorse the giving or receiving of gifts of any kind, whether in the form of cash, consumable assets, gift baskets, technology products, food and beverage privileges, or any form of entertainment, so that executives and employees at every level shall uphold the principles of honest, transparent, and straightforward conduct, without seeking personal benefit through improper means that may lead to corruption or bribery, whether directly or indirectly, and which would adversely affect the credibility of the Company and impact all groups of stakeholders.

2.2. Sponsorships


The Company may give and receive sponsorships from its stakeholders, whether in the form of monetary support, consumer goods, or technology products, provided that such sponsorships deliver benefits to the broader community, are made with transparent intent in line with the Company's stated objectives, and are free from any pursuit of personal or particular-group gain through improper means, and shall not lead to corruption, bribery, or any inducement to neglect duty.

2.3. Charitable Contributions

Charitable contributions by the Company may be made to support and promote public-interest activities, without expectation of any monetary business return or recognition from business stakeholders, society, or communities in the vicinity of the Company. Such contributions may take the form of money or any valuable asset, and shall be made only in the name of the Company.

2.4. Political Contributions

The Company does not have a policy of providing political contributions in any form, whether through publicity for any particular political party or through monetary or in-kind support. The Company adheres to democratic principles and political neutrality, and encourages all employees to act as good citizens and to exercise their democratic rights equally as provided by law.

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2.5. Conflict of Interest

The Company is firmly committed to conducting its business with integrity, transparency, equality, and fairness toward all groups of stakeholders, while giving priority to the interests of the Company. The Company shall avoid any conflict of interest that may be construed as unfair. Directors, executives, and employees shall therefore exercise due care in reviewing transactions or items that may be interrelated and could give rise to a conflict of interest, in accordance with the principles of good corporate governance.

2.6. Facilitation Payments

The Company does not have a policy of making facilitation payments to any government agency or private entity, whether to expedite any process, project, or step related to business operations, to convert unlawful conduct into lawful conduct, or to exchange business benefits on an unfair basis.

2.7. Hiring of Government Officials


The Company does not have a policy of hiring any government official currently serving in a related government position, except where such person has ceased to hold the relevant government position for a period of not less than two (2) years prior to being appointed as a director, executive, employee, or advisor of the Company. Any such hiring must be effected through the same recruitment and selection process as that applied to other employees, on an equitable basis.

3) Confidentiality

The Company recognizes the importance of maintaining confidentiality given its significant role in business operations. The Company will therefore disclose only the information required to be disclosed to the public under the regulations of the Stock Exchange of Thailand and the rules of the Office of the Securities and Exchange Commission (SEC), in order to prevent the leakage of material information that may adversely affect future business management.

Good Practices

1. The Company restricts access to classified information by granting access rights only to functions directly involved with such information, in order to maintain confidentiality and prevent unauthorized use that is contrary to the Company's regulations.
2. The Company prohibits employees at every level from disclosing function-specific confidential information to other unrelated functions, whether verbally, in writing, or by any form of documentation, in order to avoid potential adverse impacts within the Company.

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3. The Company prohibits directors, executives, and employees from using confidential business or business-plan information that is not required to be publicly disclosed — including disclosure, whether directly or indirectly, to business competitors or during prohibited periods — for the purpose of seeking improper personal benefit. This prohibition shall remain in effect even after the person ceases to be a director, executive, or employee of the Company.
4. The Company is committed to safeguarding the confidentiality of customer information by adopting a Personal Data Protection (PDPA) Policy in accordance with the Personal Data Protection Act, B.E. 2562 (2019), to ensure that information relating to customers' business activities is at all times kept confidential.
5. The Company has procedures for safeguarding the personal data of employees, which shall not be disclosed to any unrelated party, save where there is reasonable cause and legitimate need as required by law.

4) Use of Inside Information


The Company has established measures governing the use of inside information, in order to prevent the disclosure of securities trading information or information on changes in securities holdings during prohibited periods, and to prevent any person from using such information to seek benefits for themselves or for others.

Good Practices

1. In the event of a change in securities holdings arising from a purchase, sale, transfer, or receipt of securities within three (3) business days from the date of the transaction, directors and executives shall notify the Company Secretary Office to facilitate the submission of the securities holdings report to the Office of the SEC. The Company also includes the reporting of directors' securities holdings as an agenda item at every Board meeting in which a change has occurred.
2. Persons designated by the Company are prohibited from trading the Group's securities during the period of thirty (30) days prior to the disclosure of quarterly and annual financial statements, and during such other periods as the Company may specify.
3. The Company requires the disclosure of the securities holdings of directors and executives, whether or not there has been a change, in the Annual Registration Statement (Form 56-1 One Report).

5) Anti-Unfair Competition

The Company respects the rules of conducting business and strictly complies with trade competition laws, in order to avoid any action that may adversely affect competitors and to refrain from entering into any contract or arrangement of a monopolistic nature.

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Good Practices


1. The Company is firmly committed to conducting business with transparency and fairness, will not engage in any business in contravention of trade competition laws in any function, and will not take undue advantage of other operators with which the Company has direct or indirect business relations.
2. The Company promotes fair business competition under transparent rules, and will not seek confidential information of other operators through illegitimate means with a view to damaging their credibility on baseless grounds.
3. The Company will strictly comply with the terms of its contracts and will not coerce competitors into taking any action beyond what has been contractually agreed. Where either party is unable to perform the contract as agreed, that party shall promptly notify the other party in advance, in order to jointly seek a remedy and prevent potential damages.
4. The Company will not obstruct, hinder, or coerce other operators in the same business category in a manner that may adversely affect their liquidity, revenue, market value of their goods or services, or their business opportunities.
5. The Company will not discriminate against any operator or confer benefits upon any particular operator in a manner that may constitute unfair discrimination.

6) Respect for Intellectual Property Rights

In respect of inventions, innovations, projects, knowledge, or any work to be disclosed to the public in the name of the Company, the Company places importance on the thorough review of such works to ensure that they do not infringe upon the intellectual property rights of others.

Good Practices

1. The Company requires every function to review data and works used within the Company, or to be published externally in the name of the Company, to ensure that such data and works do not infringe upon the intellectual property rights of any other person or juristic entity, and that, at the same time, no other person shall infringe upon the intellectual property of the Company, including software programs, work-supporting tools, and analytical processes.
2. The Company places great importance on respect for intellectual property rights and instills awareness among employees so that they appreciate this importance and apply it in their work, by refraining from infringing, copying, or adapting the works of others to pass off as their own.
3. The Company classifies any infringement of intellectual property rights — including copyrights, patents, petty patents, trademarks, and trade secrets — by employees at any level as a serious offense affecting the credibility

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of the Company, and reserves the right to impose disciplinary sanctions in accordance with the Company's regulations.

7) Information Disclosure and Transparency

The Company requires that all information of the Company, of every type and category, be prepared and disclosed truthfully, without any concealment, distortion, alteration, or modification intended to create false information, given that such acts may affect public confidence in the Company.

Good Practices


1. The Company requires employees and functions to record the material content of any data or report and to maintain such records accurately and completely, so that information may subsequently be retrieved for verification or used to explain future operations.
2. The Company requires that documents or reports requiring certification be duly executed in full by the relevant employees or functions, confirming that the substance of such documents or reports is reliable and may be referenced accordingly.
3. The Company strictly prohibits employees at every level from altering, modifying, or distorting any information of the Company on their own initiative without the consent of the authorized decision-maker.
4. The Company requires that the preparation of material information and items, including public announcements, to be disclosed to the public pursuant to the regulations of the Stock Exchange of Thailand and the SEC, shall be carried out strictly and within the prescribed timeframe.
5. The Company will disclose material information and announcements through multiple effective and easily accessible channels, so that all groups of stakeholders may have continuous access to such information.

8) Anti-Money Laundering

The Company does not permit money laundering to take place within the Company under any circumstances. Accordingly, before entering into any transaction with new customers or counterparties, the relevant function has the duty to verify and confirm on every occasion that the counterparty has no involvement in money laundering, and has no intention of using the Company to engage in any business connected with money laundering.

Good Practices

1. The Company requires the relevant functions to screen the names of customers or counterparties on every occasion, to be satisfied that they conduct business with transparency and have no involvement in money laundering, before commencing any business relationship.

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2. With respect to receipts and disbursements between business parties, the Company will make and receive payments only from or to the counterparty or the person designated as the payee under the relevant contract, supported by clear and verifiable documentation, and will not transact with any third party or through any channel whose origin cannot be clearly identified.

9) Non-Discrimination


The Company values equality among its personnel as one of its priorities, in parallel with its commitment to operating its business efficiently and in accordance with sound governance principles, by instilling in employees the principle of equitable treatment of all personnel, without discrimination or factionalism, and with mutual respect for differences.

Good Practices

1. The Company requires that the recruitment and selection of personnel at every level and in every position be conducted on an equal basis, using the same criteria for selection, without distinction based on gender, sexual orientation, race, religion, ancestry, skin color, physical characteristics, social status, or disability.
2. The Company determines remuneration and welfare for employees at every level in accordance with the standards of each position, fairly and equitably.
3. The Company requires that training and development be made accessible to employees at every level on an equal and non-discriminatory basis, so that they receive the knowledge and skills development provided by the Company on an equitable basis.
4. The Company requires that entertainment and recreational activities be made accessible to employees at every level in every activity, in accordance with the rights to which they are equitably entitled.
5. The Company requires that performance evaluations and promotions be conducted in accordance with the rules and criteria set by the Company, and that supervisors evaluate employees free from personal bias and with fairness.
6. The Company requires supervisors to treat their subordinates equitably and inclusively, without obstructing their work or discriminating in favor of any particular employee.
7. The Company requires employees at every level to treat all groups of stakeholders with equality, without conferring any benefit upon any particular stakeholder group or person on unacceptable grounds.

10) Prevention of Sexual Harassment

The Company supports and embraces gender diversity, and promotes respect among employees at every level and in every position, between persons of the same and opposite gender, by refraining from any conduct that may cause discomfort or embarrassment to any personnel in the organization, even where that person is a subordinate.

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Good Practices


1. The Company supports mutual respect among female, male, and gender-diverse employees. Employees at every level — whether as supervisors, subordinates, or colleagues — shall treat one another with courteous language, without ridicule, derogation, or any conduct that diminishes the value of persons of differing gender identity.
2. The Company prohibits employees at every level and in every position from committing any act of sexual harassment or intimidation, whether verbal or physical, that causes discomfort, embarrassment, or a sense of insecurity to any other person, regardless of gender.

11) Occupational Health, Safety, and Working Environment

Personnel at every level and in every position are valuable resources of the Company in driving the business on a continuous basis. Accordingly, comprehensive care for occupational health, safety, and the working environment is a matter to which the Company attaches importance, so that employees enjoy physical, mental, and financial safety throughout their tenure with the organization, together with a sound working environment.

Good Practices

1. The functions responsible for the upkeep of buildings and premises shall regularly inspect workplace safety in accordance with the prescribed plan, to prevent risk to the life and property of employees at every level, as follows:
 - 1.1. Regularly inspect the availability and quality of elevators in accordance with the prescribed cycle, and prepare written records to confirm each inspection.
 - 1.2. Inspect illumination in all work areas to ensure that lighting is sufficient and operational in all areas at all times. If any function reports damage to lighting, the directly responsible function shall promptly remedy the defect.
 - 1.3. Maintain electrical appliances and electronic equipment in a state of readiness for use and ensure that they are safe for users, to prevent accidents that may affect the body or property of users.
 - 1.4. In the event of deterioration or damage to buildings or premises — such as leaking ceilings, broken floor tiles, or broken water pipes — the relevant function shall undertake urgent maintenance, and during such maintenance shall display warning signage to prevent accidents that may cause harm to employees.
 - 1.5. The Company prohibits any employee from placing items in walkways or stairways in a manner that may obstruct passage, under all circumstances.
 - 1.6. Operation of motor vehicles within the Company's premises shall be undertaken at a safe speed, and the use of horns in a manner that disturbs the work of fellow employees is prohibited.
 - 1.7. The Company maintains security personnel to oversee safety throughout the Company's premises.

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- 1.8. The Company prohibits all employees from any activity or conduct that may cause damage to the Company's buildings, premises, or property.
- 1.9. The Company grants every employee the right to immediately report to the directly responsible function any condition that may pose risk to body or to the Company's property, and shall not condone any indifference toward such hazard.
2. The Company encourages all employees to observe the 5S principles — Sort, Set in Order, Shine, Standardize, and Sustain — at their personal workstations and within the work areas of their respective functions, in order to prevent accidents and the spread of contagion.
3. The Company has installed multiple drinking water dispensers across the premises so that employees have access to clean and hygienic drinking water at all times.
4. The Company maintains restrooms that are clean and sufficient in number for the workforce within the building at all times.
5. The Company assigns cleaning staff to each floor in order to maintain cleanliness across all areas, so that employees may work in a clean and hygienic environment.
6. Waste is collected daily in accordance with the prescribed cycle by cleaning staff in every floor area, to maintain employee hygiene, prevent the spread of disease, and avoid disturbing odors during work.
7. The Company organizes fire evacuation drills for employees at every level on a regular basis, at least once per year.

12) Information and Cybersecurity

The Company has established measures and guidelines for the security of information and information systems, to enable safe, appropriate, and continuous use of information systems, network systems, and computer equipment, based on the principles of Confidentiality, Integrity, and Availability, in support of the effective conduct of the Company's business.

Good Practices

1. Access control: The Company defines access rights to information based on its level of classification and on the necessity required by the roles and responsibilities of directors, executives, and employees, in an appropriate manner.
2. For the registration, revocation, or reassignment of user access rights to the Company's information technology network, the Human Resources function shall coordinate and notify the Information Technology function in advance, to keep employee data in the system up to date.

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3. Employees are prohibited from installing pirated software on the Company's computer equipment, given the risk of data theft and the risk that the computer equipment may be infected with viruses through the installation of unauthorized programs.
4. In the event of an anomaly in the computer system, employees should promptly report the issue to the Information Technology function, so that the issue may be remedied appropriately and the risk of damage to the computer system reduced.
5. Upon receipt of any e-mail suspected to be unsolicited (spam mail), employees should refrain from opening it, including any attached files, to prevent the spread of computer viruses or the theft of the Company's sensitive information.
6. Employees are strictly prohibited from using the Company's e-mail for personal transactions or activities unrelated to the Company's operations, and from using the Company's e-mail as a channel to surreptitiously transmit confidential information of the Company to external parties.
7. Where an external person engages in operations with the Company or attends a meeting at the head office and requires access to the Company's internet network, the coordinating person shall send an e-mail notification to the Information Technology function for consideration in granting the necessary access.
8. Directors, executives, and employees have the responsibility to maintain their assigned computer equipment in good working condition at all times, and may not modify or alter such equipment without authorization.
9. Directors, executives, and employees have the duty to return computer equipment of the Company upon cessation of their employment.
10. The Information Technology function has the duty to provide training to employees on fundamental matters relating to information technology at least once per year.

13) Conflict of Interest

To prevent directors, executives, and employees from using the duties and responsibilities entrusted to them by the Company as a means of seeking non-transparent benefits for themselves or for others, the Company has established the following good practices:

Good Practices

1. Directors, executives, and employees who may have a personal interest in any transaction of the Company shall not participate in the deliberation of relevant information, shall have no authority to approve such transaction, and shall not be entitled to attend the meeting concerning such matter, in order to ensure that the resulting benefits are transparent, fair, and serve the best interests of the Company.

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2. The Company has clearly segregated the duties and responsibilities of directors, executives, and employees in order to prevent overlapping of roles and to mitigate the risk of interference in operations that fall outside the scope of one's responsibilities.
3. Directors, executives, and employees shall not use their work-related duties and responsibilities to seek personal benefits, or to confer undue advantages upon their family members, relatives, or other persons with whom they may share common interests in an improper manner.
4. Directors, executives, and employees should refrain from holding shares in businesses that compete with the Company, or in businesses that are related to the Company in any manner whatsoever.
5. The Company discloses information on related-party transactions in the Annual Registration Statement (Form 56-1 One Report) in accordance with the regulations prescribed by the Stock Exchange of Thailand (SET).

14) Whistleblowing

The Company fosters a culture of transparency and accountability by providing employees and stakeholders with the opportunity to raise concerns or report conduct that may constitute a violation of the Code of Conduct, corporate governance principles, or matters related to fraud and corruption. The Company has established whistleblowing channels that are secure, easily accessible, and confidential, in order to enable whistleblowers to disclose information without fear of adverse consequences, supported by clear mechanisms for fact-finding investigation and appropriate follow-up action.

Good Practices

1. The Company promotes an open and transparent corporate culture by enabling employees and stakeholders to report, in good faith, any concerns or inappropriate conduct that may constitute a violation of this Code of Conduct, applicable laws, or the Company's regulations.
2. The Company provides whistleblowing channels that are secure, confidential, and convenient to use, enabling whistleblowers to report their concerns without fear of retaliation or any adverse consequences.
3. Whistleblowers and complainants shall be protected from harassment, intimidation, discriminatory treatment, and any form of punitive action, whether direct or indirect.
4. All reports received shall be considered and investigated in a fair, impartial, and prudent manner, and the accused shall be afforded an appropriate opportunity to provide an explanation.
5. The Company shall maintain strict confidentiality regarding the identity of whistleblowers, except where consent has been obtained or where disclosure is required by law.
6. The intentional submission of false information shall constitute a violation of this Code of Conduct and may result in disciplinary action in accordance with the Company's regulations.

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Whistleblowing and Complaint Channels

1. Email : whistleblowing@jaymart.co.th
2. Website : <https://www.jaymart.co.th/th/investor-relations/whistleblowing-and-complaint-form>
3. Postal Mail : Addressed to "The Audit and Risk Committee" at 187, 189 Jaymart Building, Ramkhamhaeng Road, Rat Phatthana Sub-district, Saphan Sung District, Bangkok 10240
4. Suggestion Box : Located at Jaymart Building, Tower A, Floor L, 187, 189 Jaymart Building, Ramkhamhaeng Road, Rat Phatthana Sub-district, Saphan Sung District, Bangkok 10240


Code of Conduct toward Stakeholders

1) Code of Conduct toward Employees

Employees at every level of the organization, from operational staff to senior management, are valued personnel of the Company. The Company has therefore established regulations, rules, and measures to ensure that its employees enjoy sound well-being, good health, and stable and effective career advancement.

Good Practices

1. The Company requires employees at all levels and positions to perform their duties to the best of their abilities and to strictly comply with all of the Company's rules, regulations, and policies.
2. The Company requires employees at all levels and positions to refrain from any action that may undermine the credibility of the Company, and prohibits employees from invoking the Company's name to engage in any conduct that may cause harm to the Company.
3. The Company requires employees at all levels and positions to strictly safeguard Company information designated as confidential, and to refrain from disclosing material Company information to unauthorized third parties in any manner that may cause damage to the Company's business operations.
4. The Company treats its personnel at all levels and positions with equality and equity, free from any form of unfair discrimination.
5. The Company determines remuneration, welfare, and other benefits in a fair, appropriate, and lawful manner, without taking advantage of employees, and at levels comparable to those offered by businesses in the same industry.
6. The Company promotes opportunities for the career advancement of its employees, in strict accordance with the Company's established rules and procedures.
7. The Company conducts performance evaluations of its employees on a continuous, annual basis in accordance with the Company's operational plan, applying assessments that are accurate, objective, and grounded in employees' knowledge and capabilities, in a manner that is both effective and measurable.

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8. The Company provides work-related equipment and supporting facilities to employees at all levels and positions on a comprehensive and equitable basis.
9. The Company provides training programs for employees at all levels to enhance their capabilities and develop the skills required for their work, thereby supporting greater career progression and stability.
10. The Company places strict emphasis on workplace safety for its employees, providing facilities that uphold cleanliness, promote good hygiene, and safeguard the physical and mental well-being, as well as the property, of employees at all times.
11. The Company requires employees at all levels and positions to treat fellow employees, supervisors, and subordinates with courtesy and mutual respect, on the basis of equality, and to refrain from any form of exclusion, harassment, or coercion that may create undue difficulties in the performance of their duties. Employees are encouraged to collaborate effectively, to express their opinions with confidence, and to listen attentively to the views of their colleagues at all times.

2) Code of Conduct toward Shareholders


The Company is committed to conducting its business to the fullest extent of its capabilities with transparency and fairness, with due regard for its long-term growth, through operational plans that are subject to verification, in order to deliver the highest level of satisfaction to both major and minority shareholders.

Good Practices

1. The Company discloses material information to its shareholders on an equitable basis, covering both financial and non-financial information, as well as the Company's outlook in both positive and negative aspects, founded upon information that is sufficient and reliable.
2. The Company recognizes the equal rights of both minority and major shareholders, and is committed to conducting its business effectively and to the fullest extent of its capabilities, for the greatest benefit of shareholders as a whole, ensuring that they receive returns that are both appropriate and sustainable.
3. The Company conducts its business with transparency and fairness, and prohibits the pursuit of any benefit for oneself or for others through the disclosure of the Company's inside information that has not yet been made public to external parties, or through any action that may give rise to a conflict of interest with the Company.

3) Code of Conduct toward Customers

Creating customer satisfaction by delivering products or services of a quality that meets customers' needs and that is commensurate with the value paid by customers is a responsibility that the Company is committed to fulfilling effectively, by establishing trust with its customers, refraining from any distortion or false representation of information, and ensuring that the rights of consumers are not unfairly exploited.

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Good Practices


1. The Company shall be firmly committed to safeguarding the confidentiality and information of its customers as a matter of utmost importance, except where consent has been obtained from the customer, or where such disclosure is required by law.
2. The Company shall disclose material information to its customers in a transparent manner, without distortion or concealment of information that customers need to know, and on an equitable basis with respect to all groups of customers.
3. The Company is committed to safeguarding the interests of its customers as a matter of utmost importance, in order to ensure the highest level of customer satisfaction, and to respond to customers' needs promptly, in a timely manner, and on an equitable basis with respect to all groups of customers.

4) Code of Conduct toward Business Partners, Creditors, and Trade Competitors

The Company places importance on equality and integrity in conducting its business and pursuing mutual benefits with its business partners, by strictly complying with applicable laws and regulations, and by upholding ethical conduct in both its business operations and competitive practices with transparency.

Good Practices

1. The Company shall strictly comply with the agreements set forth in contracts and the various terms and conditions mutually agreed upon, and shall not undertake any action that contravenes such contracts. In the event that any party finds it necessary to amend the content or terms of the contract, the party seeking such amendment shall promptly notify the counterparty at the earliest opportunity, in order to jointly deliberate upon a mutually acceptable course of remedy.
2. The Company shall not engage in any action that may constitute the conferral of unfair benefits upon any party, whether business partners, creditors, or trade competitors, and shall treat all parties on an equitable basis.
3. The Company places importance on treating its business partners, creditors, and trade competitors with courtesy and mutual respect, while observing the principles of fair competition and acting in accordance with the law.
4. The Company shall not seek to obtain confidential information of its trade competitors through any improper means with the intent of undermining the credibility of such competitors, and is committed to engaging in business competition with transparency and fairness.
5. The Company shall not demand or solicit anything whatsoever from its business partners, creditors, or trade competitors that contravenes the Company's Anti-Corruption Policy, in exchange for non-transparent benefits that may constitute acts of corruption, whether directly or indirectly.

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- The Company places importance on the selection of business partners with transparency, in accordance with the Company's procurement and contracting regulations and procedures, and on safeguarding mutual interests in joint business operations with transparency, refraining from any action that may constitute corruption, whether directly or indirectly.

5) Code of Conduct toward Directors and Executives


Directors and executives shall discharge their duties to the fullest extent of their effectiveness, in a manner that does not contravene the principles of good corporate governance or the Company's Anti-Corruption Policy, grounded in knowledge, capability, and transparency, in order to safeguard the interests of the Company and its shareholders, as well as those of all groups of the Company's stakeholders.

Good Practices

- The Company requires directors and executives to discharge their duties with responsibility, in accordance with applicable laws, the Company's regulations, resolutions of the Board of Directors, and resolutions of the shareholders' meetings (Fiduciary Duty), in order to deliver the greatest benefit to the Company's business operations.
- The Company requires directors and executives to discharge their duties to the fullest extent of their capabilities, exercising independent judgment grounded in propriety, honesty, and transparency, and to avoid creating any conflict between personal interests and the interests of the Company.
- The Company prohibits any pursuit of personal benefit derived from holding the position of director or executive, including the use of information obtained through such position to undertake any action that may adversely affect the public's confidence in the Company.
- The Company prohibits directors and executives from having any vested interest in any transaction that is unrelated to the operations falling within the scope of their responsibilities.
- The Company requires directors and executives to safeguard the confidential information of the Company and its stakeholders, the disclosure of which may give rise to adverse consequences for the Company.
- The Company requires the establishment of an internal control system and a risk management framework, and the conduct of operations under the principles of good corporate governance at all levels.

6) Code of Conduct toward Society, Community, and the Environment

While conducting business to generate sound returns for the organization is of paramount importance, the Company does not overlook its responsibility toward society at large, the communities surrounding its operations, and the

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environment. The Company supports and promotes various initiatives that contribute to enhancing quality of life and to mitigating any adverse impacts that the Company may have on society, the community, and the environment.

Good Practices

1. The Company shall conduct its business with social responsibility, shall refrain from engaging in any business that contravenes the established norms of society, and shall cooperate diligently with social activities that pertain to the Company.
2. The Company shall not undertake any action that may give rise to a loss of public confidence in its business operations, whether at present or in the future.
3. The Company places paramount importance on conducting its business with due consideration of the various impacts that may arise upon society, the community, and the environment.
4. The Company places importance on coexisting with the communities surrounding its operations through harmonious relationships built upon mutual support as appropriate occasions arise.
5. The Company shall not undertake any action that may adversely affect the well-being of the residents of communities surrounding its operations, whether directly or indirectly.
6. The Company is committed to the utilization of resources in accordance with the 4R principles, namely: Reduce—minimizing consumption; Reuse—reusing materials in their original form; Recycle—sorting materials for processing and reuse; and Revalue—creating added value from reclaimed materials. The Company further promotes initiatives aligned with the 4R principles to ensure accessibility for employees at all levels and practical application in their day-to-day work.
7. The Company is committed to fostering environmental awareness as an integral element of its corporate culture.
8. In the event of any complaint raised by society or by communities in the vicinity of the Company, the Company shall give due attention to such complaint and take prompt remedial action at the earliest opportunity, while also identifying preventive measures to ensure that such issues do not recur.
9. The Company places paramount importance on conducting its business with due consideration of the various impacts that may arise upon society, the community, and the environment.

7) Code of Conduct toward Government Authorities and External Agencies

The Company respects the rules, regulations, and requirements governing its dealings with government authorities and external agencies, and shall strictly adhere to all prescribed procedures, in order to prevent any act that may give rise to suspicion of corruption, whether directly or indirectly.

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Good Practices


1. The Company requires that all transactions with government authorities and external agencies be conducted in strict compliance with the established rules and procedures, and prohibits the exercise of authority or the adoption of any practice that may constitute corruption in such joint dealings.
2. The Company shall strictly comply with all rules, laws, and regulations relevant to its business operations.
3. The Company shall disclose its material information in accordance with the prescribed regulations, in a manner that is accurate and unambiguous, without distorting information or providing false statements.
4. The Company promotes the practice of good citizenship among its employees at all levels and positions, in accordance with their respective legal rights.

8) Code of Conduct for Investor Relations

The Investor Relations function is required to uphold a Code of Conduct for Investor Relations as a framework guiding the proper conduct of its activities, in accordance with the regulations of the Stock Exchange of Thailand (SET) and the Office of the Securities and Exchange Commission (SEC), with honesty and integrity, and through the dissemination of credible information.

Good Practices

1. The Investor Relations function is responsible for disclosing information that is material, accurate, sufficient, and timely, in order to facilitate informed decision-making by investors and shareholders.
2. The Investor Relations function shall exercise prudent judgment in communicating information, in responding to inquiries on sensitive matters, and in disclosing facts that have not yet been conclusively determined, as such communications may give rise to adverse consequences for the Company's operations and may affect its credibility.
3. The Company has established measures to prevent the improper use of inside information by Related Persons, namely directors, executives, and employees of departments involved with inside information (including the spouses and minor children of such persons). Such Related Persons are prohibited from trading the Company's securities for a period of at least one (1) month prior to the disclosure of quarterly and annual financial statements, and should wait at least twenty-four (24) hours following the public disclosure of such information, and are further prohibited from disclosing such information to any other person.
4. The Company discloses its information to the public through the Company's website, enabling all groups of stakeholders to access such information with ease and on an equitable basis, and further provides stakeholders with the opportunity to make inquiries on any matter of concern, without discrimination.

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5. The Investor Relations function communicates information through Social Network channels to investors, shareholders, analysts, the media, and the general public, and regularly participates in activities organized by the Stock Exchange of Thailand.
6. The Investor Relations function shall refrain from any action that contravenes the principles of this Code of Conduct or the principles of corporate governance, and shall not use its duties and responsibilities to seek personal benefit.

Oversight of Compliance with the Code of Conduct


The Company assigns the Management to monitor complaints received through the various complaint channels on a regular basis, in order to ensure that the Management is able to act promptly, accurately, and fairly under the process for considering violations whenever a complaint arises. Particular emphasis shall be placed on the steps for mitigating and providing remedies to those affected by such violations, and on preparedness to improve, develop, and review measures for reducing the recurrence of misconduct in a manner appropriate to the Company's organizational context. The Company further promotes awareness of the responsibilities arising from the Good Practices set forth in this Code of Conduct, the principles of corporate governance, and anti-corruption measures, with which directors, executives, and employees shall strictly comply.

Management of Violations of the Code of Conduct

Upon the receipt of a report, or the discovery of any conduct that may constitute a violation of this Code of Conduct or a contravention of the principles of corporate governance, the Investigation Committee shall conduct a fact-finding inquiry. Persons concerned shall have the duty to provide information and submit all relevant evidence in full for the purpose of such consideration.

The consideration process shall examine the clarity of the allegation, the available evidence, and the explanations provided by the persons concerned, before formulating an opinion to be submitted to senior management or the authorized decision-maker. Should the investigation conclude that no misconduct has occurred, the outcome shall be formally communicated to the persons concerned, and the matter shall be closed without further action. However, should misconduct be established, the matter shall proceed to disciplinary consideration commensurate with the severity of the conduct.

In cases of misconduct of a minor nature, the Company may apply preliminary disciplinary measures, such as the issuance of a written warning. However, in cases of serious misconduct or misconduct that results in adverse consequences to the Company, more severe disciplinary sanctions may be considered, such as suspension from work, demotion, or termination of employment.

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In all cases, the consideration shall be conducted with due care and transparency, and the accused shall be afforded the opportunity to provide explanations before any decision is rendered. Upon completion of the investigation and disciplinary consideration, the Company shall communicate the outcome to the persons concerned and shall record such information in its monitoring system. Should the investigation reveal any matter reflecting limitations or gaps in management, the Company shall utilize such information to enhance its management system, risk management framework, and preventive measures, in order to prevent the recurrence of similar incidents in the future.

Disciplinary Sanctions


All employees are required to strictly comply with this Code of Conduct. Should any conduct be found to constitute a violation of, or non-compliance with, the principles set forth in this Code of Conduct, the Company shall consider disciplinary sanctions in accordance with the Company's work rules and regulations, with due regard to appropriateness, fairness, the severity of the act, the impact arising therefrom, and the intent of the wrongdoer.

The disciplinary sanctions shall consist of verbal warning, written warning, suspension without pay, and termination of employment. The Company shall apply the measure appropriate to the conduct and circumstances at hand, without being required to follow a sequential order of escalation.

In cases of serious misconduct, the Company reserves the right to terminate the employee's employment without prior notice and without severance pay. Such serious misconduct includes, by way of example, the giving or receiving of bribes, acts of corruption, the unauthorized disclosure of the Company's confidential information or intellectual property, the concealment of material information from supervisors, or any other act that causes severe damage to the reputation and credibility of the Company. Furthermore, should the conduct in violation of this Code of Conduct also constitute an offense under applicable law, the Company shall pursue legal action through the prescribed legal process, without being limited to internal disciplinary sanctions.

Monitoring of Operations and Review of Issues

The Company assigns the Management to monitor complaints received through the various complaint channels on a regular basis, in order to ensure that the Management is able to act promptly, accurately, and fairly under the process for considering violations whenever a complaint arises. Particular emphasis shall be placed on the steps for mitigating and providing remedies to those affected by such violations, as well as on the preparedness to review, improve, and develop the relevant processes for reducing acts of misconduct and for preventing the recurrence of similar incidents in a manner appropriate to the Company's organizational context.

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The Company further promotes awareness of the responsibilities arising from the Good Practices set forth in this Code of Conduct, the principles of corporate governance, and anti-corruption measures, with which directors, executives, and employees shall strictly comply.

Policy Review and Update Schedule

The Company requires the department responsible for the oversight of this Policy to review and update the details of each process so as to keep them current and responsive to evolving circumstances at least once per year, and to submit such revisions to the Board of Directors for consideration and approval.

This Code of Conduct shall be effective as of 11 November 2025 onwards.




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Approved By


Mr. Pisnu Pong-Acha

Chairman of the Board

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Revision History

Revision No.	Responsible Department	Review Date	Effective Date	Revision Details
REV01	Investor Relations	At BOD Meeting No. 10/2023, dated 7 December 2023	8 December 2023	1. (Added) Processes that were previously incomplete
REV02	Investor Relations	At BOD Meeting No. 6/2024, dated 8 November 2024	11 November 2024	1. (Added) Section on Corporate Responsibility (Item 1, Page 5), linking it to the Company's vision, objectives, and business strategy, in line with the recommendations of the SET and the SEC for the preparation of the Form 56-1 One Report
REV03	Investor Relations	At BOD Meeting No. 4/2024, dated 14 May 2024	14 May 2024	<ol style="list-style-type: none"> 1. (Added) Expansion of activities relating to Anti-Corruption across seven (7) categories (Items 2.1-2.7, Pages 7-8) 2. (Amended) Separation of the section "Confidentiality and Prevention of the Use of Inside Information," which was previously consolidated under a single section, into two distinct sections for greater clarity, as follows: <ul style="list-style-type: none"> ● Confidentiality: Good Practices added (Items 1 and 5; Item 3 revised; Pages 8-9) ● Prevention of the Use of Inside Information: New Good Practices added (Items 1-3, Page 9) 3. (Added) Section on Information and Information Systems Security, together with Good Practices (Pages 14-15) 4. (Added) Section on Conflict of Interest, together with Good Practices (Page 15) 5. (Added) Section on Whistleblowing and Complaint Handling (Page 16) 6. (Added) Section on the Code of Conduct for Investor Relations, together with Good Practices (Page 21-22) 7. (Added) Section on the Oversight of Compliance with the Code of Conduct (Page 23)

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Revision No.	Responsible Department	Review Date	Effective Date	Revision Details
				8. (Added) Section on the Management of Violations of the Code of Conduct (Page 23-24) 9. (Added) Section on Disciplinary Sanctions (Page 24) 10. (Added) Section on the Monitoring of Operations and Review of Issues (Page 24-25)
REV03	Investor Relations	At BOD Meeting No. 7/2025, dated 11 November 2025	11 November 2025	Annual policy review for 2025; no substantive amendments. The existing version shall remain in force until further revision is made.