



# THANTAWAN INDUSTRY PUBLIC COMPANY LIMITED

# CODE OF CONDUCT

FOR DIRECTORS, EXECUTIVES, EMPLOYEES AND INVEST RELATION



## Company's visions & missions

### ■ vision

Our vision for the future would like to see our company prosper and grow up. We are wish to build an organization that has the following features. We will be a manufacturer of universal plastic packaging for customers and be **the hub of plastic packaging solutions**.

### ■ Mission

We are confident that "the mission" is the reason for the organization can be firmly in the present. Be sustainable and to grow in the direction that we can look forward to the future. We have the missions that need to be performed including;

1. Support the business model to suit the era. (Re-Business Model)
2. Development of the operational structure of the organization and to operate effectively. (Re-Structuring)
3. Building to reflect the corporate culture business. (Re-Culture)



## Business Principles

The Board of Directors is committed to promote on the basis of morality, ethic, transparency in business operation with a focus on a code of conduct in all aspects, in accordance with the principles of Corporate Governance Policies and lead to Governance Committee.

The Board of Directors have set the “Code of Conduct for Directors, Executives and Employees” to serve as the best practices with business fairly to all concerned both internal and external organization, including Stakeholders i.e.; Shareholders, Employees, Customers, Trade Partners/Creditors, Trade Competitors in business society fairly to stabilize and sustainable growth steadily to the organization and shareholders.

Thantawan Industry Public Company Limited considered that the “Code of Conduct for Directors, Executives and Employees” is part of the regulations to personnel management, Employees practices and misconduct to disciplinary action. We believe that the Company’s Employees behave properly in accordance with the guidelines of the Code of Conduct will reflect the accountability with acceptable by all parties involved in doing business and ethical manner perpetually.



### Purpose of Conduct

- To guide the general principles to Directors and Executives of the Company to be awareness and commitment to ethical principles and legal aspects of business operations.
- To communicate channel for stakeholders to report any act that is illegal or against to ethical principles. To ensure that the information is the best treated as confidential.
- To strengthen the confidence of shareholders, Employees, customers, trade partners/creditors, government and society. To achieve the business goals of the Company.
- To comply the good practices of the Company with Good Corporate Governance recommended by The Stock Exchange of Thailand.



## Definitions

Code of Conduct	<i>Means</i> a code of behaviors specified by the Company to protect, maintain and enhance their reputations.
Company	<i>Means</i> Thantawan Industry Public Company Limited.
Director	<i>Means</i> Director's of Thantawan Industry Public Company Limited.
Executive	<i>Means</i> Vice President, Division Manager or equivalent.
Employee	<i>Means</i> permanent as well as temporary and contract Employees.
Personnel involved	<p><i>Means</i> Individuals who are associated with any manner as the following details :</p> <p>(1) Persons who have an authority to control the Company in case of incorporation, shall include the Directors of the corporation.</p> <p>(2) Spouse, Child or Adopted child who is immature of Directors, executive or person as per (1).</p> <p>(3) Entity as per (1) or (2) has an authorized to control business.</p> <p>(4) Other persons who have an appearance adhere to prescribe by the Securities and Exchange Commission Thailand.</p>
Other Stakeholders	<i>Means</i> Shareholders, Employees, Customers, Trade Partners/Creditors, Trade Competitors Government, Private sectors, Society, Community and Environment.
Disclosure of Information	<i>Means</i> Disclosure of information relating to the business activities of the Company, under the Public Company Act of 1992, the Securities and Exchange Commission Act of 2008, rules, regulations of The Stock Exchange of Thailand and the Securities and Exchange Commission Thailand.



## 1. Board of Directors and executive

### 1.1) Board of Directors

This is your obligation to take responsible for a preparation of the “Code of Conduct for Directors, Executives and Employees” of Thantawan Industry Public Company Limited. To revise or update as appropriate including receiving the complaints, review and follow to live out the principles of the Code of Conduct.

#### 1) Executives at all levels perform duties :

- 1.1) To encourage compliance with the Code of Conduct and behave as a role model.
- 1.2) Transfer of policy and practices in conjunction with listening to an opinion widely about a compliance issue.
- 1.3) Training Employees to take responsibility and provide management system that comply with legal requirements and regulations of the Company.
- 1.4) To supervise the operations of the agency in accordance with relevant regulations.

#### 2) Director

- 2.1) All Directors shall make an appropriate decision and perform duties with integrity for the utmost benefits of the Company. The Directors shall operate and make decision with carefulness and prudence similarly to people in similar business situations.
- 2.2) The Directors must not seek any undue benefit from the position of Directors both direct and indirect for personal benefit or others concerned. They must disclose any personal benefit information that may cause a conflict of Interests to the Company or the cause of the conflict of interest with the Company.
- 2.3) Directors must not take any information that obtained from the position as Directors in a manner of inappropriate. The use of insider information for trade securities of the Company is prohibited. They shall clearly and fully disclose information and prepare a report of their holding of shares to the office of the Securities and Exchange Commission (SEC) according to the rules and regulations pursuant to The Stock Exchange of Thailand (SET). Those who acknowledged the insider information should not be trading the securities of the Company within 1 month prior to publish financial statements to the public and at least 24 hours after it has been disseminated.
- 2.4) Directors must not disclose trade secrets or key business information to the third parties. Additionally, they must not provide information not yet disclosed to anybody which may affect to the price or value of securities of the Company.



- 2.5) Directors as the authorized persons must make a decision and perform to preserve the interests of the Company including shareholders, Employees, customers, trade partners/creditors and other stakeholders.
- 2.6) Directors shall comply strictly with laws and with transparency and accountability. They must not accept any proposal or gift or other valuables from stakeholder that may influence their decisions, actions or omissions or assignment to any fraud.
- 2.7) Directors are persons who have been trustfully assigned by shareholders. Therefore, they have to protect shareholders' right
- 2.8) Board of directors must not offer undue benefits to shareholders or to third parties other than in normal course of business

## 1.2) Code of Conduct for Executives

Executives of the Company who have been selected as an expert, leadership and be capable to control the operation of the Company with efficiency and productiveness. In order to achieve its goal, Company Executives are subject to the following practices.

- 1) To act with integrity for the utmost interests of the Company.
- 2) To apply their knowledge and Management skills with their best ability for the interests of the Company.
- 3) To perform duties carefully without any obligation that may conflict with their duties afterward.
- 4) To be responsible for decision making and executions on their own as well as being able to clarify or explain on it.
- 5) To refrain from seeking the benefit, whether for themselves or for their related persons, by taking any nonpublic information which may effect to conflict of interest of the Company.
- 6) To give priority to the development of skills and competency of Employees by giving them the opportunity comprehensively and on a regular basis.
- 7) To comply strictly with laws and regulations in relation with the Employees and pay attention to the employee's comments.
- 8) To practice to staffs with courtesy and pay respect to individuality and the dignity of humanity, and also to avoid any unfair action which may harass and pressure to the state of mind of the employees.
- 9) To educate Employees to understand the ethics and duties that they comply and to promote ethical behavior within the framework throughout the Company.
- 10) To create awareness to Employees at all levels to take responsibility to society without doing any damage to natural resources and environment.
- 11) To conduct or supervise Employees to comply strictly with the spirit of the laws and regulations.



- 12) To strictly keep the confidential information of the Company and customers and shall not disclose confidential that has not been published.

## 2. Persons covered by the Code of Conduct

2.1) **Employees** : This is considered to be a duty of Employees, to understand and strictly comply with the Code of Conduct. Any queries or questions, please consult with supervisor, human resources or assigned person to take responsible for monitoring through various channels as defined. Also to notify the supervisor or person in charge when find any violation or non-compliance and to co-operate in such a fact investigation with agency or appointed person by the Company.

The following actions are misconduct to the Code of Conduct:

- Failure to comply with the principles of Code of Conduct.
- Suggestion, promote or encourage others who are not compliance with our Code of Conduct.
- To be neglected and ignored when found in violation or failure to comply with the Code of Conduct or in the event that they know or should know, relating to work under their responsibility.
- Non-cooperation or interference on the investigation or on fact finding regarding violation or non compliance to the Code of Conduct.
- Be unfair to others, due to such non-compliance reports.

### 2.2) Ethics for Practices with Stakeholders

The Company has a policy to treat all stakeholders in accordance with the relevant laws and encourage co-operation between the Company and stakeholders, besides creating growth and sustainability of the business.

#### 1) Ethics for Practices with Shareholders.

- 1.1) The Company is committed to conducting business on the growth potential or actual capabilities to ensure that shareholders receive a return on investment with effectively working and the excellent operating result of the Company.
- 1.2) The Company will treat all shareholders equally to the disclosure of company's information with completely, sufficiently, fairly and transparently according to The Stock Exchange of Thailand and the Securities and Exchange Commission Thailand.
- 1.3) The Company will treat all shareholders equally both Meeting of Shareholders and other cases in relation to The Stock Exchange of Thailand, the Securities and Exchange Commission Thailand in conjunction with related laws.
- 1.4) The Company will comply with the law, The Articles of Association, resolutions of Board of Director, resolutions of the shareholders meeting, implementation of the best practices to corporate governance, moral and ethics in business. In addition, to treat all shareholders equally either major or minor interests for the utmost benefits of Shareholders.





- 1.5) The Company will provide various channels to disseminate information including preparation of the Company's website in both Thai and English version to make it suitably, simply and easily for shareholders to access.

## 2) Ethic for Practices with Customers.

- 2.1) The Company will treat customers with integrity, fairness and uphold the interests of all customers with equality.
- 2.2) The Company will comply strictly with conditions of business to customers and deliver products with reliable quality.
- 2.2) The Company is committed to develop products excellence to meet customers' requirements. be innovative to add value to the products consistently.

## 3) Ethic for Practices with Trade Partners/Creditors

- 3.1) The Company will treat Trade Partners/Creditors equally and fairly, based on the basis of obtaining a fair return by both sides including to comply with the conditions strictly agreed on.
- 3.2) The Company aims to develop and maintain sustainable relationships with Trade Partner/Creditors together with obviously objectives in terms of quality products and services that worth to the value of money, Technical quality and mutual trust.
- 3.3) The Company has procurement procedures to be used in the procurement and bidding process.

## 4) Ethic for Practices with Trade Competitors

The Company will be a competitor of trade under the rules of good competition. Not to violate trade secrets of the competitors by Means of dishonest or improper. Also will not destroy competitors' reputation by saying disparagement.

## 5) Ethic for Practices with Employees

- 5.1) The Company shall create and maintain a work environment to be safe and occupational health. The Company is committed to conducting business with environmental concerned and shall provide a workplace that is free from hazardous materials with safety and health, or if any that shall be considered with acceptable criteria.
- 5.2) The Company shall give priority on employees development to enhance their skills, knowledge and potential on a regular and equitable basis.
- 5.3) The company extensively provides an equitable employment opportunity for all.
- 5.4) To listen to opinions and suggestions based on professional knowledge of Employees.



## 2.3) Responsibilities to the Company

### 1) Observance of Laws and Company's Regulations

- 1.1) Employees must fully comply with all governing laws and regulations.
- 1.2) Breaches of the laws, shareholders' resolution or Company's regulations are not justified by the pursuit of profit or any other reasons.
- 1.3) Employees must always adhere to the highest standards of honesty and integrity in the conduct of our business despite the loopholes in laws or relevant regulations.

### 2) Protecting Company Assets

- 2.1) Company assets mean movable and immovable property including technology, knowledge, records, rights and copyrights.
- 2.2) Employees must use the Company's assets in an economical and efficient way and avoid any damage or loss.
- 2.3) The records of our transactions are important corporate assets. Each operating unit has to determine the retention of its records and the degree of confidentiality for effective operations. Documents must be kept in a way that is safe, complete and retrievable.
- 2.4) All business records, accounts, and reports to government agencies and others must be prepared with care and honesty and must be recorded in accordance with appropriate company accounting procedures.
- 2.5) All employees must ensure that accounting, financial and internal control procedures are strictly adhered to at all time. Employees should advise the responsible supervisor or the Good Corporate Governance Committee of any deviations they observe in such procedures.

## 2.4) Code of Conduct for Conflict of Interests and Use of Information

Code of Conduct for Conflict of Interests protection : The Company has a policy that Board of Directors, Executives and Employees must not exploit their relationship with the Company for their own interests. As a result, the following guidelines are stipulated.

- 1) To avoid any transactions on their own that may affect to the conflict of interest with the Company.
- 2) In case need to do it for the benefit of the Company, it should be conducted as if it is a transaction done with a third parties with trade agreements in the same **manner** as general of the contract without any influence of the Executives, Directors or persons concerned. Furthermore, Directors, Executives or Employees having an interest in a transaction must not be involved in its approval process. The



company must act in compliance with rules and regulations of the Stock Exchange of Thailand and the Securities and Exchange Commission in relation to disclosure of the transactions.

- 3) In case transaction is considered as a related party transaction under the notification of the Stock Exchange of Thailand, Such transactions must be strictly proceed and disclosed accordingly.
- 4) If director, executive or employee member becomes a director, partner or advisor in another company, such position must not conflict with the Company's business or that person direct responsibility to the Company. In addition, it must be granted a prior approval from Managing Director.
- 5) In consideration of transactions that have or may have a conflict of interests among shareholders, Directors, Executives or other persons, that transactions must be conducted fairly, transparently, rationally and completely disclosed.
- 6) If director, executive, employee or their family member is involved with or being a shareholder in a business in competition with the Company or any other business that may cause a conflict of interests with the Company, he/she must inform the Board of Directors in writing.
- 7) Whether in the line of duty or discharged from active duty, Employees must not disclose confidential information of the Company for any interests, whatsoever electronic information, financial information, operations, business information, future plan of the Company and others.

#### 2.5) Code of Conduct for the use of Insider Information

The Company has a policy to prohibit and oversee employee in exploitation of insider information of the Company which is not published yet for personal benefit or for the others in dealing with securities trading, particularly to one month period prior to the financial statements release to the public as the following details.

- 1) Notify to Board of Directors and Executives that they are obliged to report the securities of the Company held by themselves, spouse and immaturity including its' change to the office of Securities and Exchange Commission under Section 59 and punishable under Section 275 of the Securities and Exchange Act of 1992.
- 2) Notify to Board of Directors, Executives, Department Heads and Employees of the Company to avoid the use of insider information that is not disclosed to the public and shall be substantial changes to the prices of securities of the Company for

personal gains. The Employees who breach of this prohibition will be prosecuted by law.

#### 2.6) Employees' Behavior with Fellow Employees

- 1) Employees who are supervisors shall conduct themselves in a manner which will be respected by the employees. Employees shall refrain from any conduct that is disrespectful of supervisors.
- 2) Employees shall be protected from any deliberate discrimination or harassment in word or action against others based on the basis of race, gender, religion, age, and physical or mental disability.
- 3) Employees shall behave in a faithful, honest and conscientious way to create the quality, efficiency and for organization excellence.
- 4) Employees should not make any malicious accusation on any executives or other employees without truth.
- 5) Employees should work together to maintain the working environment of unity.
- 6) Employees should refrain from any action that will damage the reputation of company or may be a source of embarrassment for company. Employees should protect their honor to be accepted by the society.
- 7) We encourage all employees to exercise your rights of citizenship in accordance with the constitution and relevant laws.
- 8) The direct or indirect employment of our assets for any political support is strictly prohibited.

#### 2.7) Safety, Occupational Health and Environment

The Company is committed to providing Employees and surrounding our workplace with wellbeing and preserving the good environment. We will define procedures to ensure the safety in the workplace in accordance with relevant laws and regulations.

##### 1) Safety and Occupational Health

- 1.1) The Company will strictly comply with applicable laws and regulations in relating to safety and occupational health. In addition, a reliable safety standard will be implemented if there is no law and regulation declared using in such period.
- 1.2) The Company will endeavor to the prevention of accidents, injury and illness due to occupation with well co-operation from all Employees. Furthermore, will strive to control and mitigate any risks caused from business operations.
- 1.3) The Company will provide the regulations, procedures and training to employees to ensure that they understand and receive sufficient information regarding safety in the



workplace in order to prevent hazards caused by machinery, ways of working or diseases.

- 1.4) Supervisor has a responsibility for delineation or dissemination the guidelines for prevention and control of accidents, health problem from working with Employees and other concerned. In addition, to provide the health check to employees appropriately.

## 2) Social and Environment Responsibility

- 2.1) The Company will comply with laws and all applicable environmental laws and ISO 14001.
- 2.2) The Company's policy is to conduct business with commitment to society and the environment and also to comply with all relevant laws and regulations together with the regulations of Local Administration i.e., Municipality, Sub-District Administrative Organization. (SAO)
- 2.3) The Company will collaborate to reduce garbage or waste from both manufacturing process and general usage. Moreover, to study and co-operate in the elimination of garbage and wastes in corrective way.
- 2.4) The Company will carry out the conservation of natural resources by reducing the number of unnecessary usage, taking the reuse of natural resources and product development by using bio-degradable and compostable materials.
- 2.5) Employees, who are involved in the production process or machine, is responsible for updating and upholding of manufacturing process or the machine to meet the standardize, besides to reduce the use of natural resources.

## 3) Community and Society Responsibility.

The Company recognizes the importance of balancing business, economic, social and environmental with sustainable growth of the Company. An efficient organization is coupled with a better organization of society. Therefore, we are committed to operating with integrity and fairness. Compliance with laws and regulations completely and take into account of benefits and impacts to the operations from the organizations to stakeholders of the Company i.e.,shareholders, Employees, customers, trade partners/creditors, trade competitors, in conjunction with oversee safety, occupational health and environment. This will not effect to all stakeholders.

## 2.8) Complaints and Suggestions

Board of Directors of the Company give an opportunity to Employees and stakeholders, to have a channel for complaint, suggestion, reporting illegal acts or reporting in relation with the Code of Conduct directly to Managing Director of Thantawan Industry Public Company Limited through the following channels as:

1. Via postal mail to : Chairman of the Board of Director

Thantawan Industry Public Company Limited  
143-144 Moo 6, Petchkasem Road, Omyai,  
Sampran, Nakornpathom 73160

2. Electronics mail to Chairman of the Board of Director via e-mail : [board-thip@thantawan.com](mailto:board-thip@thantawan.com)

3. Telephone Number : 02-273 8333 Ext.3203

### **Part 3 Code of Business Conduct**

#### **3.1) Stakeholders**

Committed to promoting the Company as an efficient entity that is responsible to stakeholders whether business related or personnel related. The company has defined the following basic guidelines for directors, the management and employees :

##### **1) Shareholder**

- 1.1) Perform duties with integrity and make decisions in good faith and in fairness to major and minor shareholders as well as to the good of relevant parties.
- 1.2) Manage the company's business for growth, progress and security for proper returns to shareholders.
- 1.3) Perform duties and make decisions in competent and cautious. Applying the utmost knowledge, experience and management skills to all cases.
- 1.4) Report the company's status and performance to shareholders equally, regularly and completely.
- 1.5) Refrain from seeking undue benefits for oneself and related parties by exploiting inside information.
- 1.6) Refrain from unduly disclosing the company's confidential information.
- 1.7) Refrain from potential conflicts of interest with the company.

##### **2) Customers**

- 2.1) Make quality products while transparently and equally complying with contracts, agreements, or conditions given to customers. If this cannot be done, negotiate with customers in the company will treat customers with integrity, fairness and uphold the interests of all customers with equality.
- 2.2) The company will comply strictly with conditions of business to customers and deliver products with reliable quality.
- 2.3) The company is committed to develop products excellence to meet customers' requirements.  
Innovative to add value to the products consistently.
- 2.4) Systematize customer service and initiate communication channels for customer's complaints while doing one's best to promptly address their needs.



2.5) To make a value consistently to the confidentiality of customer's information while refraining from exploiting such information for personal or other gains.

### 3. Business Partners

3.1) Stringently, transparently and equally to observe contracts, agreements and conditions that give to Business partners.

3.2) Refrain from demanding from, accepting and paying improper commercial benefits to business partners.

3.3) If conditions cannot be observed, will negotiate with business partners well in advance to jointly find reasonable remedies.

### 4. Business Competitors

4.1) Treat business competitors with fairly for mutually fair returns.

4.2) Comply with the rules of fair competition.

4.3) Refrain from dishonestly or improperly by seeking confidential information of business competitors.

4.4) Refrain from defaming business competitors through slander.

### 5. Creditors

5.1) Stringently, transparently and equally to observe contracts, agreements and conditions that give to creditors.

5.2) Make a report the company's financial status consistently with integrity, accuracy and promptly to creditors.

5.3) If conditions cannot be observed, negotiate with Creditors well in advance to jointly find remedies and prevent damage.

### 6. Employees

6.1) Provide fair and proper compensation in line with the knowledge, ability, responsibility and performance of each person.

6.2) Promote, transfer, reward and punish employees fairly and in good faith while relying on their knowledge, ability, suitability and behavior.

6.3) Treat employees fairly and value their development, knowledge and competency transfer through extensive and regular opportunities given to them.

6.4) Strictly obey laws and regulations related to employees.

6.5) Ensure that the work environment is always safe and healthy to employees and their properties.

6.6) Avoid unfair practices that could disrupt employees' job security.

6.7) Pay attention to the views and comments of all employees in a fair manner.



- 6.8) Promote employees' understanding of the code of conduct and roles to promote compliance with the code throughout the company.
- 6.9) Promote employees' participation in defining business directions and in remedy problems for units in question and the company as a whole.
- 6.10) Promote ongoing training in job-related disciplines.
- 6.11) Promote righteousness among the workforce.

## 7. Communities, Society and the Environment

- 7.1) Refrain from harming natural resources and the environment are more than allowed by the law.
- 7.2) Refrain from supporting activities that harm or threaten society or morality or promote vices.
- 7.3) Value community and social activities by ensuring social, community and environmental development and promoting innovation and conservation of natural resources.
- 7.4) Support public-service activities including reduction of energy and natural resource consumption.
- 7.5) To cultivate an awareness of social and environmental constantly with responsibility to the company and among the workforce.
- 7.6) Co-operate and ensure strict compliance with the spirit of law and relevant rules.
- 7.7) Response promptly and efficiently to events, affect communities and the environment because of the company's business by lending full cooperation to public officials and relevant agencies.
- 7.8) Institute a complaint-filling system for matters potentially impacting and inform complaint-filers about the company's action in due time.
- 7.9) Promote efficient energy conservation for the sake of future generations.

### 3.2 Respect of the Laws and Principles of Universal Human Rights

- 1) Employees must thoroughly study laws relevant to their roles and responsibilities while strictly complying with them. If in doubt, they must seek advice from the Law department and must never follow their own interpretation.
- 2) The company has categorized laws and public rules for ready reference and provides due employee training.
- 3) The company must strictly conduct the principles of universal human rights. To educate employees in regard to their performing job. The company does not encourage any undertaking that violates these principles.
- 4) On overseas business trips, employees should study relevant countries' laws, customs and cultures, prior to making the trips. To ensure that the goods, samples and equipment, travel documents, trip objectives and performance of their duties are lawful and not against local customs and cultures.





### 3.3 Conflict of Interest

The company' actions are based primarily on its own interests and not involved to any activities that may be conflict of interest as :

- 1) Employees must make business decisions on behalf of the company in its best interest.
- 2) Employees' actions and decisions must be free of personal ambitions or those of related parties whether Through blood relationship or through those of other acquaintances. Prices are to be made fair and suitable as If transactions were conducted at arm's length. When it is necessary to decide on or approve an item with potential conflicts of interest, the employee in question must report it to his or her superior or those involved in approving it to his or her withdrawing from any involvement in such an item.
- 3) Employees must conduct the same company procedures under the same standards by developing their full time and ability. There engagement in a non-company business is considered an improper use of their time.
- 4) Employees must avoid any financial engagement or relationship with external parties that could harm the company' interests and lead to conflicts of interest or hamper effective performance of their own duties.
- 5) The performance and positions of directors, the management and all employees must not do against the company's core interests.

### 3.4 Connected Transactions

Here are the guidelines observed by the company to ensure that connected transactions follow generally commercial practices in its best interests :

- 1) Performing securities and exchange laws, regulations, announcement, instructions or terms of the Stock Exchange of Thailand (SET), the board conducts the terms for the disclosure of information on connected transactions and the acquisition or sale of the company's significant properties under the accounting standards defined by the Federation of Accounting Professions.
- 2) Connected transactions under SET's announcement must strictly follow the criteria and procedures to the disclosure of the connected transactions.
- 3) If it is necessary to undertake connected transactions involving themselves, employees must give the top

Priority to the company' interests and undertake such transactions, management team members and employees involved in these transactions must stay away from the approval process.



### 3.5 Maintaining Confidential Information and Use of Inside Information

Prevention of inside trading is not only vital to the company's success, but also plays a key role in employees' job security. To ensure harmless external distribution of information, the company has defined the following code of conduct for maintaining confidential information and using inside information :

- 1) Employees should maintain inside information and sensitive documents that could lead to undue exploitation for themselves, their families or their associates including any information influencing stock prices and the company's proprietary commercial secrets, formulae and inventions.
- 2) Employees must not apply the company's confidential information for personal or others' gains.
- 3) Employees who have received personal information must take good care of or using it cautiously.
- 4) The company has defined the information about contractual parties and the agreements with these parties as sensitive information. Also it is not to be shared with the others, except when both of the company and its contractual parties have given their consent.
- 5) The company should institute strictly measures and processes for guarding its information within its departments to prevent publicity before its formal distribution. These measures and processes are regarded as an integral part of the company's risk control measures.
- 6) The company has assigned roles and responsibilities to all superiors for the prevention of leaking of the key information and news by subordinates before the company's formal distribution.
- 7) Jointly using of inside information by employees must be strictly on a need-to-know basis.
- 8) Even after their termination or retirement, employees must not disclose the company's confidential information.

### 3.6 Giving or Acceptance of Present, Properties or other benefits

The company has defined that the giving of presents, properties or other benefits must be reasonably done and not influence its decisions as the following conduct :

- 1) Employees and/or their families should not demand presents, properties or other benefits from contractors, vendors, suppliers, joint-venture partners or those related to the company's business under any circumstances.
- 2) If the superior considers its improper to accept any presents, properties or other benefits, these items will be promptly returned to the giver (s). If this cannot be done, they must be forwarded to the superior and their disposal will then be the company's prerogative.
- 3) As a tokens that presents to the company, to commemorate its milestones including joint-venture agreement and signing or awards/the tokens for the company's participation in social responsibility activities. These can be received by employees on behalf of the company.



- 4) Employees should not give their superiors any presents, for which superiors must not give their consent or agree to let their relatives accept them. Exceptions apply on customary occasions of exchanging presents, but their values must not exceed three thousand baht.
- 5) In case of maintaining friendship or good relations, it is inevitable to accept properties or other benefits from domestic or foreign giver (s) worth more than three thousand baht – whether these are specified as personal – the recipient must promptly report this to his or her superior. If the superior sees no good reason to allow his or her subordinate to keep them for personal use, the subordinate must submit such items to the superior so that such properties or benefits may become the company's properties.
- 6) Employees should not give or accept or promise to do so benefits or items of value to entice others to perform or refrain from performing their duties including any actions regarded as such. If the company finds any violations of ethics and morality, will take due action as required by its personnel policy and procedures on such employee (s) or service user (s) who violates the policy and rules which may include revocation of IT rights.

#### **Part 4 Invest Relations**

- 4.1) Conduct duties with integrity and professional manner.
- 4.2) Disclose effectively to ensure that all stakeholders receive accurate timely and precise information on equal basis.
- 4.3) Ensure that relevant stakeholders are able to access and inquire for necessary information.
- 4.4) Confidential information and any inside information for personal benefits are strictly prohibited.
- 4.5) Conduct knowledge regularly with development and effectiveness.
- 4.6) Silent period or analyst for 10 calendar days , prior to the announcement date.
- 4.7) Investor Relations Officer is prohibited to trade the company 's stock for 10 days (calendar), prior to the announcement date until 1 calendar day after the announcement date of Operations result.

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