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SAKSIAM LEASING PUBLIC COMPANY LIMITED

Code of Conduct and Business Ethics

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Part 1: General Provisions

Definitions

To ensure a mutual and aligned understanding of the key terms used in this Code of Conduct and Business Ethics, the definitions are established as follows:

- **Code of Conduct and Business Ethics:** The best practices in conducting business by applying ethical measures, which serve as rules and standards of behavior and conduct within the organization, to employees and stakeholders, in order to establish behavioral standards, legal frameworks, and traditions as core practices for operating the organization.
- **The Company:** Saksiam Leasing Public Company Limited.
- **The Enterprise or the Organization:** Saksiam Leasing Public Company Limited.
- **The Board:** The Board of Directors of Saksiam Leasing Public Company Limited.
- **Executives:** The Chairman of the Executive Committee, Managing Director, Deputy Managing Director, Regional Business Managers, and Assistant Managing Directors.
- **Employees:** Directors, Chief Executive Officer, Deputy Chief Executive Officer, Managing Director, Deputy Managing Director, Managers of each line/ department, Senior Directors, Directors, permanent monthly employees, permanent daily employees, and special contract employees.
- **Suppliers:** Providers of goods and services to the Company.
- **Customers:** Users of the Company's products and services.
- **Associated Parties:** Individuals or juristic persons with whom the Company maintains business relations, including the government, government agencies, state enterprises, private organizations, and public charities, among others.
- **Stakeholders:** Individuals involved with the Company across various dimensions, such as employees, shareholders, associated parties, suppliers, customers, communities, society, the environment, and creditors.
- **Gifts or Any Other Benefits:** Money, property, or benefits given to one another as a gesture of hospitality, rewards, ex-gratia tokens for assistance, or gratuities. This includes the granting of special privileges not made available to the general public, such as discounts on prices or service fees, special access to entertainment services, as well as covering travel, accommodation, or dining expenses, or any other items of a similar nature, whether provided in the form of cards, tickets, or similar tokens, advance payments, or subsequent reimbursements.

- **Customary Traditions** means festivals or material occasions where gifts may be exchanged, including opportunities to express congratulations, gratitude, hospitality, condolences, or rendering assistance according to socially accepted etiquette.

Vision

"To be a provider of vehicle title loans, career promotion loans, and other retail loans to retail customers, with a core focus on career promotion, delivering accurate, transparent, fair, convenient, and rapid services with customer attentiveness, being trusted by society to help enhance the well-being of people in communities, ensuring employees operate within ethical boundaries with a stable income, and providing appropriate returns to shareholders."

Mission

1. Conduct business in adherence to corporate governance principles and comply with all legal requirements.
2. Drive business operations to consistently increase revenues and profits every year.
3. Deliver loan products that directly match customer needs with fair and transparent services capable of responding to stakeholder requirements.
4. Manage risks and the quality of the loan portfolio efficiently and in a timely manner.
5. Develop loan support systems and internal operations to elevate competitive efficiency, strengthen business continuity, and enhance cyber security.
6. Manage financial liquidity.
7. Conduct business with deliberate consideration of social and environmental impacts.
8. Elevate professional operational standards within the organization to promote a good quality of life for employees.

Goals

Goals represent clear expressions of intent or behaviors required of the organization to fully support the Vision and Mission. Therefore, every action of every activity within the organization must demonstrate a response to the following:

1. Comply with all regulations of regulatory bodies and all matters of law.
2. The Company must participate in assessment programs to elevate operations and build credibility at the national level.
3. The loan portfolio must grow by at least 10% annually:
 - Year 2026: Portfolio of 15,950 Million Baht
 - Year 2027: Portfolio of 17,550 Million Baht
 - Year 2028: Portfolio of 19,300 Million Baht

4. Maintain interest and fee income growth of at least 10%.
5. Maintain profit growth of at least 10% and maintain a profit margin of no less than 25%:
 - Year 2026: Profit of 850 Million Baht
 - Year 2027: Profit of 935 Million Baht
 - Year 2028: Profit of 1,030 Million Baht
6. Increase revenue channels, such as integrated agricultural loans, SME loans, and insurance brokerage.
7. Survey customer needs and provide rapid services.
8. Control collections and manage aging debts due for payment in a timely manner.
9. Formulate risk analysis and risk prevention methods to avert non-performing loans (NPLs).
10. Develop internal management processes for optimal efficiency:
 - Establish convenient, rapid, and complete connection and coordination between branches and the Head Office.
 - Utilize information technology data for more analytical benefits.
 - Ensure information systems are secure and unaffected by cyberattacks.
 - Define measures to protect against unauthorized access to Company data.
 - Ensure the personal data of all stakeholder groups does not leak.
 - Continuously develop the loan operational system.
11. Adopt technology to support operational expansion to reduce redundant resource consumption, managing organizational growth alongside risk management for corporate sustainability.
12. Procure adequate funding sources to support loan portfolio growth and maintain financial liquidity to manage no less than 3 months of operations.
13. Control the consumption of expendable resources, such as water, electricity, and vehicle fuel, to appropriate levels.
14. Opt for eco-friendly business initiatives, such as solar rooftop loans and solar pump loans, among others.
15. Develop human resource frameworks to ensure personnel possess professional knowledge and skills, resulting in organizational efficiency and target achievement.
16. Maintain an adequate number of appropriately qualified senior executives.
17. Build a positive workplace culture and harmonious coexistence within the organization.

Values and Corporate Culture

Core Value

Values mean the beliefs adopted to guide organizational behavior, which the organization and its people expect and commit to practice due to their recognized worth. The Company's core value is announced as follows:

“We value and uphold integrity and morality to maintain the dignity and honor of being human.”

Corporate Culture

Culture is what individuals within the organization practice uniformly and pass down until it becomes a unique corporate identity. It arises from connecting and blending philosophy, attitudes, values, beliefs, norms, policies, objectives, and goals into consistent actions in the same direction, inheriting 7 key mindsets as follows:

1. **Principally:** Principles represent truth and correctness. They exist beyond us and are independent of individuals; whether people like them or not, they remain as they are. Employees are fully aware that they must respect and comply with principles in their work, regardless of personal preference. Work must be principal-driven, and once established, those defined principles must be respected. The Company's principles are formulated as regulations, rules, and announcements disclosed generally. Employees comply with these principles even across expansive and remote service areas. Being principal-driven and respecting principles is an essential corporate culture.
2. **Organizational Behavior:** Employees recognize that the organization is not the personal property of any single individual to act upon as they please. The organization is a unified entity; work is an essential, structured, and systematic component governed by lines of command. Organizational work has clear targets and successes that must be achieved, which ultimately constitutes the good life of employees. Adopting and demonstrating organizational behavior is a culture clearly recognized and practiced collectively, resulting in an organization with efficient management.
3. **Diligence:** Targets are milestones that employees always fulfill. Under highly competitive business environments, patience, diligence, and determination to achieve targets form a corporate culture that employees have respected and upheld for a long time.
4. **Managing Time:** Every employee is responsible for time management, ensuring that time critical to targets is not compromised. Employees always consider that the key to a good operational plan is its completion and target achievement within the

scheduled timeframe. Respect for time is a corporate culture evident in employee life, such as attending meetings on time, avoiding tardiness, and maintaining self-respect by not working haphazardly, but driven by timelines and targets.

5. **Corporate Governance:** Employees are instilled with and practice 6 core corporate governance principles: (1) Respect for national laws and good social rules, (2) Morality, (3) Transparency and accountability, (4) Inclusivity and fair sharing, (5) Accountability to duties, and (6) Economy and cost-effectiveness. These principles are consistently cultivated, taught, and encouraged to remain embedded in employee awareness.
6. **Corporate Social Responsibility:** Since the Company operates numerous branches and service units across regions, employees are deeply aware of community care and the importance of surrounding environments. They participate in social activities, viewing society as a home to safeguard. Employees are taught that "the Company can only survive if society survives." Delivering services that satisfy society, providing community relief during natural disasters, and tying loan provisions to social care represent the working approach and culture of the Company and its employees.
7. **Knowledge Management (KM):** Employees are deeply familiar with "KM," which is practiced consistently across business units, times, and workplaces. KM allows employees to converse, share viewpoints, voice collective feelings, and determine how life and work should progress. Employees are instilled with KM regarding saving, financial management, investment, and living ethically. Executives write and transmit moral teachings and reflections to employees every morning through corporate communication channels, a long-standing practice making Saksiam widely recognized as a learning organization capable of continuous self-development.

Part 2: Business Ethics

Meaning

Business Ethics is the integration of personal ethics held by executives and employees of all levels with the ethics of business operations. Its goal is to create success in business operations responsibly, fairly, sustainably, and with long-term effects, while simultaneously building credibility, faith, and trust among stakeholders, including shareholders, employees, customers, suppliers, communities, creditors, the government, and the surrounding society.

Business Ethics Policy

The Company adheres to conducting business based on honesty, integrity, transparency, morality, and ethics to ensure that shareholders, employees, customers, suppliers, creditors,

communities, the government, and all stakeholders have confidence that the Company complies with laws, standards, and good business practices. Financial information shall be disclosed accurately, completely, and on time. Undisclosed inside information shall not be used for personal gain or for associated parties, and no actions causing damage or conflicts of interest shall be executed.

Personal Ethics

Personnel here refers to employees and executives who are critical to the production and service delivery of this business. The Company's business does not utilize machinery for production but relies on individuals to deliver services that satisfy customers. The personal ethics of employees and executives are heavily emphasized, documented, and practiced for no less than 20 years, summarized by the short Thai acronym "**Rab - Sue - U - Dam - Rian**" (Responsibility, Integrity, Dedication, Preservation, Learning), which translates to:

1. **Responsibility** = Accountability to duties.
2. **Integrity** = Absolute honesty and uprightness.
3. **Dedication** = Dedicating oneself to targets.
4. **Preservation** = Preserving fine culture.
5. **Learning** = Committing to continuous self-learning and development at all times.

These personal ethics encompass being a complete person who is responsible for their duties, executes work with integrity, drives targets to fulfillment, coexists with corporate culture, and continuously develops themselves to keep pace with the world, society, and technology. This set of ethics has been deeply instilled and practiced until it represents the employee persona recognized generally by society.

Business Ethics Guidelines

The Company commits to complying with business ethics as follows:

1. Operate and manage business by strictly adhering to the vision, mission, and goals, with diligent attention to audit standards and internal controls to eliminate risks across all business units.
2. Respect principles, operational frameworks, and defined scopes of duty through active awareness and implementation.
3. Conduct business transparently by disclosing financial information accurately and completely in accordance with public accounting reporting standards.

4. Respect time, be punctual, and manage business with deliberate consideration of time efficiency.
5. Strictly respect and comply with all laws and regulations.
6. Refrain from utilizing undisclosed inside information for personal gain or the benefit of associated parties.
7. Refrain from any actions that cause corporate damage or conflicts of interest.
8. Manage by consistently adding value to individuals and the organization.
9. Conduct business with consideration for social benefits, ensuring they are no less than organizational benefits.
10. Continuously preserve the fine traditions of society and the Company.

Part 3: Corporate Code of Conduct

Meaning

Corporate Code of Conduct means the behavior, practices, and established good rules representing the standards of action expected of a business operator to maintain and promote 4 pillars of honor: personal honor, dignity, prestige, and reputation.

To ensure organizational compliance, this Code of Conduct and Business Ethics manual has been prepared so that the Board, executives, and employees of all levels across all departments maintain standard alignment as follows:

3.1 Compliance with Laws and Relevant Regulations

Company executives have long emphasized that employees and supervisors across all departments must respect, accept, and comply with government regulations and commercial rules, avoiding any unlawful involvement. Utilizing employees or Company assets for illegal purposes is strictly prohibited.

Best Practices:

1. Employees must comply with all regulations and laws of both the nation and bodies regulating the Company, meaning the requirements of the Stock Exchange of Thailand (SET) and the Securities and Exchange Commission (SEC).
2. Violating laws, shareholder resolutions, Board resolutions, rules, regulations, or orders under the pretext of maximizing Company profits or any other reasons is completely unacceptable.

3. Employees must execute their duties with honesty and integrity, keeping the legitimate interests of the Company paramount.
4. Employees must comprehensively understand the laws and Company regulations related to their duties and responsibilities. If uncertain, consult the Legal Department, Human Resources Department, or executives; do not operate based on unverified personal understanding.

3.2 Performance of Duties

1. Maintain personal conduct rooted in honesty, integrity, fairness, and both personal and business ethics.
2. Execute duties with responsibility, prudence, and a full devotion of physical and mental energy, upholding moral principles with organizational benefit as the primary consideration.
3. Execute duties with diligence, which includes constantly seeking methods to develop and improve work efficiency.
4. Safeguard personal honor by adhering to the 4 pillars of honor: personal honor, dignity, prestige, and reputation, maintaining human dignity to be well-accepted in society.
5. Maintain discipline by behaving in accordance with the regulations, culture, and fine traditions of both society and the Company, whether documented in writing or not.
6. Avoid any actions that may impact the reputation or corporate image, or cause subsequent problems for the organization.
7. Do not use organizational working hours to perform external work or for personal benefits that hinder full performance during Company working hours.
8. Employees and personnel are strictly prohibited from committing acts that cause distress, annoyance, demoralization, disunity, hostility, operational interference, or generating misconceptions through malicious speech or actions. This includes sexual harassment, sexual infringement, molestation, indecency, and the creation or possession of pornographic or obscene media through verbal or physical contact unrelated to therapeutic or medical purposes, whether toward internal personnel or visiting external parties.
9. Company personnel are prohibited from using the organization's name or their job titles to solicit money or items for personal benefits, regardless of the objective.
10. Employees have a duty to execute operations according to the lawful orders of supervisors, including cooperating with and supporting corporate activities organized to build unity, set good examples, promote public relations, and maintain organizational culture.

11. Avoidance, non-cooperation, indifference, or groundless evasion demonstrates a lack of code compliance. The Human Resources Department must proceed according to criteria, regulations, and disciplinary frameworks.
12. Employees must seek knowledge and commit to continuous self-development.
13. Utilize organizational property and resources with prudence and caution, considering the potential damage and lost organizational benefits arising from negligent use.

3.3 Conflicts of Interest

The Board, executives, and employees must execute work with the Company's interest as the primary consideration. They must remain constantly aware of whether they hold a personal interest or conflict of interest. If an issue is identified, they must recuse themselves from those duties, allowing others to assume responsibility to eliminate allegations of overlapping interests or misusing power for personal gain at the Company's expense.

Best Practices:

1. The Board, executives, and employees are prohibited from using their influence or authority to execute transactions between the organization and parties associated with the employee or any other individuals, unless the interest has been fully disclosed, processed through procurement systems, and granted permission or authorized in principle.
2. Parties associated with an employee's family may execute transactions containing general commercial terms free from the influence of directors, executives, and employees, provided the terms match what a reasonable person would execute with general suppliers under standard procurement procedures.
3. Issuing orders to generate personal benefits for the Board, executives, and employees by the order-issuer is strictly prohibited.
4. During any meeting agenda where a participant holds an interest, the interested director, executive, or employee must temporarily leave the meeting room to allow other participants to consider, analyze, and critique free from the interested party's influence.
5. The Board, executives, and employees must not borrow money or accept property exceeding reasonable customary traditions from suppliers to prevent influence over duty performance.
6. The Board, executives, and employees must not act to seek personal gain or embezzle property belonging to, or rightfully belonging to, the Company or its customers.
7. The Board, executives, and employees should avoid situations, personal activities, and financial interests that conflict with their bound operational duties.

8. If the job position or responsibilities of a director, executive, or employee directly or indirectly benefits themselves, family members, relatives, or external individuals, they must not participate in the decision-making process and must notify their line supervisor without delay.
9. The Company must avoid assigning responsibilities to directors, executives, employees, or associated persons in cases that may lead to situations causing administrative conflicts, corporate conflicts of interest, or conflicts with customer interests.
10. The Board, executives, and employees are prohibited from assuming any position in organizations operating the same business nature as the Company, competing with the Company's business, or operating businesses that conflict with Company interests.
11. The Board, executives, and employees must comply with the criteria, methods, and disclosure requirements for connected transactions in accordance with the regulations of the Stock Exchange of Thailand and the Securities and Exchange Commission.

3.4 Maintaining Confidential Information of the Company

Confidential information means non-public data or data that, if disclosed to the public or competitors, would cause severe impacts on the Company. This includes data that suppliers and customers provide to the Company and its employees in good faith. Everyone in the Company has a duty to maintain confidentiality by restricting access to a need-to-know basis. It represents a vital duty for data supervisors, possessors, or witnesses to strictly secure the data.

Concurrently, the Company is bound and responsible for safeguarding the confidential data of customers and suppliers regarding system transactions and personal profiles. Utilizing such data must strictly align with the Company's normal business objectives and must not be used for personal benefits.

The Board, executives, and employees have a duty to secure customer data as confidential, exercising constant caution when usage is required. This obligation to maintain Company and customer confidentiality persists even after the individual has terminated their employment with the Company.

Best Practices:

1. The Company defines data confidentiality levels and security practices. Material documents and specific confidential data must be protected through specific methods defined for each level, type, or category. Every employee must secure the confidentiality of their responsible areas from falling into unauthorized hands.

2. Employees who have retired, resigned, or completed their employment with the Company must continue to maintain and refrain from disclosing Company secrets.
3. The Board, executives, and employees must keep commercial data confidential unless disclosure is legally mandated, required for litigation purposes, authorized for disclosure, or already public.
4. Employees must not disclose inside information gained from duty performance to external individuals, including parents, relatives, and family members unrelated to the Company, and must not use inside information for personal gain.
5. Data disclosure must be performed strictly by authorized employees. General employees have no duty to disclose information. If asked to disclose data outside their scope, refer the enquirer to the designated disclosure personnel to ensure accurate and aligned communications.
6. Employees are prohibited from disclosing Company data through guesswork, generalization, or summarizing topics where they lack true factual data, as this causes misconceptions and corporate damage.
7. Employees have a duty to maintain records, whether physical documents or electronic data. Document retrieval must follow defined security rules, and when documents reach their destruction cycle, request approval and proceed according to document destruction regulations.
8. The Company requires the Board, executives, and certain categories of relevant employees to execute Non-Disclosure Agreements (NDAs).

3.5 Recording Transactions, Reliability of Data, and Data Preparation

Executives, shareholders, and regulatory bodies rely on the accuracy of Company data to monitor operations and make decisions. The Company places great value and trust in every employee to cooperate in compiling accurate and fair data based on standard accounting practices and general principles. Every entry and report across all categories must be compiled and prepared in a timely, accurate, precise, and transparent manner under identical standards, suitable for public disclosure.

Report and data preparation must be performed accurately, honestly, and transparently. If subsequent audits reveal that an employee or associated person intentionally falsified reports, causing recipients to misunderstand realities, it shall be deemed a material violation of this Code of Conduct and Business Ethics. The individual shall face appropriate disciplinary actions based on defined consideration principles.

3.6 Misuse of Information

The Company establishes a policy mandating that the Board, executives, and employee's control, oversee, and keep internal data confidential. Gained inside information must not be used to seek direct or indirect benefits without prior corporate consent. This responsibility against data misuse binds both current employees and separated employees for a designated duration. Disclosing data to external parties must remain under the governance and responsibility of supervisors and senior executives.

3.7 Using Inside Information for Securities Trading

The Company values inside information used by investors for investment decisions, whether regarding operating results, expansion plans, or other relevant data prior to official regulatory disclosure. Accessing inside information and utilizing it to trade Company securities creates unfairness toward other investors lacking access. The Company prohibits using inside information not yet disclosed to the Stock Exchange of Thailand to trade Company securities.

Best Practices:

1. Every employee must strictly comply with the Securities and Exchange Act B.E. 2535, regulations of the Securities and Exchange Commission, the Capital Market Supervisory Board, the Stock Exchange of Thailand, and other relevant authorities.
2. Utilizing material inside information that impacts Company stock prices and is not yet public for personal or external gain constitutes a legal violation and breaches working regulations.
3. Executives, designated employees, and family members must not trade Company securities while possessing inside information not yet publicly disclosed.
4. Employees must not disclose material inside information that impacts Company stock prices to unrelated individuals.

3.8 Safeguarding Company Assets

Company assets means movable property, immovable property, technology, academic knowledge, data, rights, patents, copyrights, trademarks, trade secrets, confidential business methods, and other resources to which the Company holds rights, including work products derived from duty performance, unless explicitly authorized as the property of the inventor, creator, or researcher.

Best Practices:

1. Employees have a duty and responsibility to use Company assets economically to maximize benefits, ensuring they do not deteriorate prematurely, and refraining from using them for personal or external benefits, or disseminating them without authorization.
2. Business data and documents represent material Company assets. Each unit must define document storage rules, destruction timelines, and confidentiality levels, ensuring the completeness of legal contracts recorded according to standards.
3. Employees must prepare business, accounting, and financial documents transmitted to government units or associated parties prudently and honestly, recording transactions according to standards.
4. Employees must not replicate, modify, or utilize the Company's intellectual property for personal or external benefits without corporate authorization.
5. Employees must respect and refrain from infringing upon the intellectual property of others. Gained knowledge must be properly referenced or legally utilized. If an intellectual property infringement is witnessed, notify relevant authorities.
6. Employees have a duty to cooperate and assist in expressing rights or seeking legal protection for the Company's intellectual property.
7. Participate in verifying the rights of external assets brought into use to reduce intellectual property infringement risks.
8. Employees have a duty to report to supervisors when witnessing acts deemed as rights infringements that may lead to intellectual property disputes.
9. The Company maintains a politically neutral policy. Executives and employees must not use Company resources to support the political activities of political parties.
10. Employees must strictly comply with the Personal Data Protection Act (PDPA), such as encrypting customer data and preventing unauthorized access.

3.9 Gifts, Tokens, and Business Hospitality

Accepting gifts, tokens, and business hospitality, including giving according to tradition and ethics, represents normal practice among the Board, executives, and employees to express gratitude, care, or congratulations.

However, giving or receiving gifts, property, or inappropriate benefits that impact decision-making, generate bias in duty performance, or cause subsequent embarrassment must be approached with caution. The Company does not support or authorize such actions under any circumstances.

Best Practices:

1. Employees receiving gifts who are uncertain of suitability must consult their supervisor or close executives to ensure awareness.
2. Gifts should be accepted righteously, maintaining appropriate value, avoiding legal violations, or masking hidden benefits derived from one's position.
3. Seeking or soliciting property or benefits from suppliers, contractors, or builders that may lead to subsequent position-based benefit exchanges is strictly prohibited.
4. Bribery is strictly prohibited, as it leads to subsequent entanglements and compromises the Company's reputation.

3.10 Social and Political Rights

The Company is a politically non-aligned, neutral organization that does not join political groups or back politicians, but supports personnel in exercising their social and political rights according to constitutional laws, ensuring the Company operates free from political pressure.

Best Practices:

1. The Company maintains political neutrality, refraining from using resources to support political activities, parties, groups, or politicians directly or indirectly, and prohibits political entities from using Company resources or venues for political activities.
2. The Company encourages employees to express, participate in, and support political rights outside working hours using personal resources. Employees must not use authority, duties, titles, resources, capital, or the Company's name to solicit support for political activities.

3.11 Treatment of Stakeholders**3.11.1 Treatment of Shareholders and Investors**

The Board, executives, and employees commit to generating maximum satisfaction for shareholders and investors by focusing on sustainable growth and consistent, appropriate returns, backed by transparent operations, reliable accounting, and equal information disclosure.

Guidelines for Sustainable Growth:

1. Executives and employees must execute duties to the best of their abilities with honesty, integrity, and fairness toward all shareholders for maximum benefit.

2. Decisions and actions must be performed with prudence and caution.
3. Refrain from operations that generate corporate conflicts of interest.
4. Structure operational systems with standard controls, deploying full knowledge and caution based on sufficient data, verifiable evidence, and relevant laws.
5. Formulate risk management and internal control frameworks, reviewing them consistently.

Guidelines for Information Disclosure:

1. Strictly comply with the requirements of the Stock Exchange of Thailand, the Securities and Exchange Commission, the Capital Market Supervisory Board, and relevant laws, ensuring equal disclosure to shareholders and the public.
2. Do not disclose non-public information or trade Company securities when possessing non-public data. Utilizing non-public inside information for personal securities trading violates this Code.
3. The Investor Relations unit or assigned personnel hold the duty to provide information to the public and investors.

3.11.2 Treatment of Customers

The Company commits to building customer satisfaction and confidence by delivering quality products and services, maintaining accountability, and fostering sustainable relationships under fair customer service principles (**Market Conduct**).

Best Practices:

1. Develop products and segment customers appropriately to build satisfaction and confidence in receiving quality goods and services, continuously elevating operational standards and a service-minded corporate culture fairly, which influences compensation.
2. Disclose complete, accurate service data without factual distortions, and maintain enforcement measures to prioritize service quality.
3. Structure grievance systems for customer service, executing optimal responses to ensure rapid resolution.
4. Implement sales processes that strictly follow customer terms without deception, coercion, harassment, or exploitation. If an agreement cannot be fulfilled, notify the customer in advance to seek mutual solutions.
5. Secure customer data confidentially and consistently, refraining from utilizing it for personal or associated benefits.

6. Employees must receive communication and training to provide non-discriminatory, open, and straightforward services based on business relations, backed by standard audit systems.
7. Provide multi-channel grievance access for customers, such as telephone, Company website, social networks, and mail.

3.11.3 Treatment of Suppliers and Creditors

The Company values procurement and sourcing as critical processes for obtaining quality supplies and capital. Operations must follow good, transparent, and accountable steps for maximum benefit, establishing equal treatment, positive relations, fairness, mutual respect, and honesty.

Best Practices:

1. Every procurement and debt-incurring unit must consider requirements, cost-effectiveness, price, and quality. Sourcing, negotiation, and agreements must proceed transparently, valuing equity, correctness, and fair price/quality competition under standard inspection rules.
2. Personnel executing procurement, sourcing, and debt-incurring operations must maintain documented evidence, draft contracts, executed agreements, and compliance records for designated durations.
3. Negotiations must be transparent and accountable without soliciting direct or indirect benefits, maintaining a neutral stance without over-familiarity with suppliers, in accordance with conflict of interest codes.

3.11.4 Treatment of Business Competitors

Best Practices:

1. Operate within the rules of fair competition.
2. Refrain from seeking competitor data through dishonest methods.
3. Refrain from making groundless allegations or malicious statements to destroy competitors' reputations using false data.
4. The Company supports free, fair, and honest trade competition.

3.11.5 Treatment of Employees

The Company values its employees as the critical factor driving the organization to success. It commits to developing ethics, culture, and positive workplace atmospheres, providing

continuous training, and promoting teamwork without factionalism. The Company treats employees with respect and honor, providing appropriate welfare, compensation, technological innovations, and equipment for operations.

Best Practices:

1. Provide equality without discrimination based on origin, race, skin color, gender, age, religion, or education, committing to developing capable, ethical, and moral individuals.
2. Executives support personnel in demonstrating capabilities, deploying decentralized management that empowers position-based decision-making, providing appropriate returns, and motivating through salary, performance-based pay, bonuses, and diverse welfare.
3. Maintain working environments that safeguard employee life and property.
4. Transfers, rewards, and disciplinary actions must be executed equitably, principal-driven, and based on rules, laws, capabilities, roles, and evident performance.
5. Listen to opinions and suggestions from all levels equitably, organizing regular employee meetings and instructing managerial levels to open-mindedly receive feedback during sessions.
6. Create channels for employees to report misconduct or regulatory/legal violations, backed by confidentiality systems that protect informants. If investigations verify the truth and penalize wrongdoers, the reporting employee shall receive a confidential reward.
7. Enforce compliance with organizational morality and ethics, organizing essay and slogan contests to stimulate corporate loyalty, ensuring employees work out of organizational pride rather than just for wages.

3.11.6 Responsibility toward Society, Communities, and the Environment

The Company values society, communities, and the environment, recognizing that humans and organizations are interrelated components of society. It instills a sense of the common good, ensuring employee quality of life is integrated with communities, safeguarding community quality because the Company operates genuinely within those spaces.

Best Practices:

1. Conduct business with society and communities as primary considerations, complying with social and community regulations with respect.

2. Commit to participating in social and community quality, reminding employees of their civic identity first without viewing communities as separate entities.
3. Instill social and environmental awareness through consistent corporate socialization processes.
4. Cooperate with communities concretely through financial donations, religious participation, traditions, and diverse developments.
5. Prevent corporate and employee accidents as part of public policy, such as preventing theft, promoting road safety, and reducing national social costs.
6. Respond rapidly and efficiently to events impacting the environment, communities, life, and property, cooperating with relevant public officials and communities.
7. Optimize resource and energy efficiency, cooperating to prevent pollution and waste arising from employee and corporate activities.
8. Support clean, eco-friendly solar rooftop energy loans.

3.12 Anti-Corruption Code of Conduct

Corruption means bribery, the misuse of position, duties, and/or utilizing inside information gained from Company performance to execute actions that benefit oneself, associates, and/or others to obtain property or inappropriate commercial benefits, directly or indirectly, including actions contradicting Company business ethics, except where permitted by law, regulations, announcements, local traditions, or commercial customs.

Best Practices:

1. The Company provides an Anti-Corruption Policy and cooperates with external organizations to promote and support anti-corruption initiatives.
2. The Company opposes and rejects all forms of corruption, committing to applying preventive measures against corruption.
3. Directors, executives, and employees must not execute, accept, or support corruption in any form, directly or indirectly, encompassing consumer goods, contractors, or relevant subcontractors. Compliance audits regarding this Anti-Corruption Policy must be conducted regularly, reviewing guidelines to align with policies, regulations, laws, and business shifts.
4. The Company integrates anti-corruption measures as part of business operations, designating it as a responsibility for the Board, executives, supervisors, employees of all levels, suppliers, or subcontractors involved in executing anti-corruption policy targets.

3.13 Safety, Occupational Health, and Environmental Code of Conduct

Directors, executives, and employees recognize the importance of health management, safety, occupational hygiene, and environmental systems. Therefore, everyone must strictly consider and comply with relevant quality, safety, health, and environmental standards.

Best Practices:

1. Directors, executives, and employees should verify their health and physical readiness prior to operations, refraining from work if unfit, to reduce workplace hazards.
2. Personnel performing duties carrying life or health risks must study data regarding unsafe or hazardous working conditions. During any risky operational step where the outcome is uncertain, suspend or delay that operation to consult specialists immediately, and report abnormalities to supervisors urgently if they impact safety, health, or the environment.
3. Supervisors across lines of command hold the duty to define or disseminate guidelines to prevent and control workplace accidents among employees and associated individuals.
4. Directors, executives, and employees should maintain a genuine, continuous awareness of natural resource and environmental conservation, promoting economical resource use for maximum benefit.
5. Directors, executives, and employees should cooperate in implementing standards or agreements formulated to prevent environmental impacts.

3.14 Information Systems and Data Communication Network Usage Code of Conduct

The Company aims to ensure that service usage and provisioning operate together appropriately, aligning with business policies and preventing problems arising from incorrect information technology network use or diverse threats. The Company formulates an Information Security Policy and measures to guide auditing and securing information systems for continuous availability and IT risk reduction, such as cyber threats, to build user confidence.

The Company recognizes information security and data risks that may significantly impact operating results if personal data leaks or security systems fail. The Company defines minimum security standards, configuring system and processing equipment security to match service delivery and relevant legal frameworks. Consequently, the Company sets policies and measures to manage and prevent such risks, guiding directors, executives, and employees to

recognize data importance and avoid actions impacting organizational information security, backed by regular system development and reviews.

Best Practices:

1. The Information Security Policy serves as the fundamental security framework for developing secure processes and systems suited to business operations. Specific security policies are formulated as appropriate to comply with business requirements, laws, and regulations. Material standards and supporting procedures may be compiled to implement the policy.
2. Executives, employees, and external parties involved with corporate data must understand, accept, and comply with the Information Security Policy.
3. The Information Security Working Group is responsible for overseeing and reviewing policy content at least once a year to align with shifts and future risk trends impacting corporate information security, such as IT strategic changes or material transitions like organizational or technological restructuring.
4. The Information Security Working Group must assess policy effectiveness to improve content or strategic implementation plans for organizational efficacy.
5. The Information Security Policy must be documented according to purpose and scope, obtaining approval from executives or the Board for enterprise-wide announcement and implementation, binding executives, employees, and data/asset users.
6. Executives, custodians, and users of data and IT assets have a direct duty to support, implement, and strictly follow the policy. General users without custodial duties must cooperate with policy implementations. Policy violation constitutes a severe breach, subject to maximum organizational penalties.

Upholding the Code of Conduct and Business Ethics

Employees have a duty to comply with the Code of Conduct and Business Ethics with understanding, acceptance, and faith, exercising caution to avoid breaches, setting good examples, and strictly practicing compliance.

Violating or failing to comply with the Code of Conduct and Business Ethics, including Company regulations, shall face disciplinary actions defined in the "Company Working Regulations."

Compliance Recommendations:

1. Understand the contents of this Code of Conduct manual.
2. Learn contents relevant to one's duties and responsibilities.

3. Regularly review knowledge and understanding of this Code manual.
4. Educate and build understanding among personnel performing associated duties.
5. Report to executives or supervisors upon witnessing violations or non-compliance.
6. Cooperate in fact-finding investigations with assigned units or individuals.
7. Executives, heads, and supervisors of all levels must lead in code compliance, fostering working environments where employees and associated parties understand that code compliance is correct and mandatory. Claiming ignorance of this Code manual is unacceptable.
8. When encountering doubts or queries regarding code implementation, consult supervisors and/or the Human Resources department assigned to monitor compliance.

Actions Constituting Code Violations

Every employee has a duty to comply with and encourage associates to follow the Code. The following actions constitute violations:

1. Failing to comply with the Code.
2. Advising, encouraging, or supporting others to violate the Code.
3. Neglecting or ignoring witnessed non-compliance when one knows or should know due to relevance to works under their responsibility.
4. Lacking enthusiasm or remaining indifferent, representing non-cooperation or obstruction of fact-finding investigations auditing code violations.
5. Acting unfairly toward others because they reported non-compliance. Violators shall face disciplinary considerations under defined rules, and potential legal penalties if the action breaks the law.

Personnel Designated to Oversee and Promote Code Compliance

1. **Company Directors** are responsible for formulating the Code manual, updating it for consistent suitability, and arranging appropriate compliance assessments.
2. **Executives of all levels** hold the following duties:
 - 2.1 Promote code compliance attentively and enthusiastically, prioritizing it and setting good examples.
 - 2.2 Transmit policies and practices, open-mindedly receiving feedback regarding code compliance.
 - 2.3 Train employees to be responsible, structuring management systems that align with legal frameworks, Company regulations, and the Code.
 - 2.4 Govern unit operations to comply with relevant rules and regulations.

3. **Human Resources Department** and/or assigned units are responsible for clarifying and building understanding among employees for successful code compliance.
4. **Internal Audit Department** is responsible for reviewing data when there are grounds to believe violations of regulations or codes exist, reporting to supervisors sequentially or to the highest executive.
5. **Every employee** has a duty to comply with, oversee, and encourage code compliance, presenting obstacles or difficulties in code compliance to executives, supervisors, or the Internal Audit Department for subsequent presentation to the Board.

Part 4: Governance, Misconduct Reporting, and Penalties

Meaning

- **Good Governance:** Management designed to control operations across areas, defining individual responsibilities according to position and duties, alongside establishing monitoring and control methods for maximum transparency and efficiency.
- **Misconduct Reporting:** The duty of organizational employees to report clear knowledge, discovered leads, or reasonable assumptions indicating actions or behaviors that contradict the Code of Conduct and Business Ethics.
- **Penalties:** Company implementations executed according to established regulations to halt actions or behaviors that contradict the Code of Conduct and Business Ethics.

Governance

It is designated as a duty and responsibility for the Board, executives, and every employee to acknowledge, understand, and strictly comply with the Code of Conduct and Business Ethics, providing systematic internal control and audit frameworks, backed by disciplinary penalties for violators.

Internal Control and Audit

The Company values Good Corporate Governance processes, meaning professional, international management systems, efficient Internal Control, and reliable reporting systems that benefit all stakeholders under efficient, standardized internal controls.

Best Practices:

1) Objectives of Internal Control

Internal Control means processes established by governors, executives, and employees to provide reasonable assurance that organizational operations fulfill the following objectives:

- 1.1 Operations:** Focuses on operational efficiency and effectiveness, governing resource use economically and cost-effectively, alongside safeguarding property, preventing and reducing errors, damage, leakage, waste, and corruption.
- 1.2 Financial Reporting:** Focuses on compiling accurate, reliable, and timely internal and external financial reports, maintaining fairness across parties.
- 1.3 Compliance with Applicable Laws and Regulations:** Focuses on directing business operations to comply with relevant rules, laws, and regulations, alongside following policies and working methods established by the Company.

2) Internal Control System

Organizing the internal control system by referencing the **COSO Framework**, which comprises 5 components:

2.1 General Control Environment:

- 2.1.1 The Company clearly defines business policies, goals, and directions, governing operations to fulfill targets.
- 2.1.2 The Company establishes a Code of Conduct for the Board, executives, and employees to practice correctly. Internal public relations must communicate that honest, ethical duty performance is paramount.
- 2.1.3 The Company structures the organization with clear lines of command and separated responsibilities for thorough, efficient governance.
- 2.1.4 The Company provides clear Job Descriptions and Instruction Manuals as operational tools to prevent redundant or omitted actions across positions.
- 2.1.5 The Company provides an Audit Committee responsible for corporate governance according to Board assignments.
- 2.1.6 The Company provides an Internal Audit department, viewing internal audit as a vital mechanism driving efficient controls, making audited units increase operational vigilance.

2.2 Risk Management: The Company arranges risk assessments from internal and external factors to provide adequate, reasonable assurance that damage or errors are averted, remaining within acceptable levels. Risk assessments must be conducted continuously using business analytical frameworks, ensuring decisions are backed by sufficient data to eliminate management risks.

2.3 Control Activities:

2.3.1 The Company defines budget policies prudently and thoroughly, preventing capital shortages and supporting business competition and growth.

2.3.2 Operations are controlled to fulfill organizational objectives, ensuring plans and targets are met through compliant execution by executives and employees, free from material violations of rules, policies, or orders.

2.3.3 The Company structures clear segregation of duties for mutual verification to prevent circumstances favoring corruption.

2.4 Information and Communications:

2.4.1 The Company provides timely communication and information systems critical to personnel operations, enabling rapid, efficient awareness and troubleshooting.

2.4.2 The Company provides accurate, complete accounting and financial reports.

2.4.3 The Company maintains consistent, rapid internal communication between executives and operators via the Intranet system, keeping data current.

2.4.4 The Company designates responsible personnel or an Investor Relations department to provide corporate data, financial reports, and stock-impact data to investors accurately.

2.5 Monitoring:

2.5.1 The Internal Audit department and Risk Management department audit operations, evaluate internal controls, and report findings to management and the Audit Committee. If weaknesses are identified, management must implement systematic control measures to prevent recurrence. The Board must review control adequacy to safeguard Company assets according to stock exchange requirements and laws, preventing conflicts of interest.

2.5.2 Audited units advised to modify operations or strengthen controls must be monitored by the Internal Audit department, reporting progress to management and the Audit Committee consistently until the system is deemed appropriate, tight, and efficient.

2.5.3 External auditors must verify that the internal control system is appropriate, tight, and free from material deficiencies impacting the Company.

3) Personnel Responsible for Internal Control

- 3.1 **Board of Directors** defines policies and governs the implementation of appropriate internal control systems, ensuring consistent monitoring and evaluation.
- 3.2 **Audit Committee** acts on behalf of the Board regarding internal control system reviews, reporting outcomes to the Board and shareholders.
- 3.3 **Risk Management Committee** acts on behalf of the Board regarding risk policies, risk tracking, and management results, reporting to the Board and shareholders.
- 3.4 **Executives** are responsible for auditing internal systems within units for efficiency and regulatory correctness, reviewing controls, tightening measures, and instilling control awareness and discipline in subordinates.
- 3.5 **Employees of all levels** must respect and consistently implement the rules, regulations, orders, measures, and internal control systems established by the Company.
- 3.6 **Internal Audit Department** is directly responsible for evaluating risks, control adequacy, and effectiveness, leading to optimized control measures matching changing risk environments for corporate efficiency.

Risk Management

Risk Management is the management of factors, control of activities, and operational processes aimed at reducing the causes of corporate damage, or keeping future damage sizes within acceptable, calculable, and systematically auditable levels, focused primarily on corporate target achievement.

The Company prioritizes risk management through serious risk studies, appointing personnel and risk governance committees to review, track, and assess impacts to reduce monetary and non-monetary damage causes, such as reputation and legal litigation, maximizing corporate strength and stability as primary goals.

Best Practices:

1. **Fostering Corporate Inclusivity:** Build a collective mindset where employees feel part of the organization, recognizing that misconduct in one area can generate cascading risks across other components.

2. **Risk Identification and Discovery:** Requires collaborative study because personnel executing specific duties know best which activities carry corporate risks. Therefore, every employee has a duty to report identified risk issues to their unit supervisor.
3. **Risk Assessment:** Executives and employees must evaluate and prioritize risks according to standards defined by the Risk Management Committee, aligning with risk management policies.
4. **Risk Response:** The Risk Management Committee defines risk response criteria, considering cost-benefit trade-offs.
5. **Risk Monitoring and Evaluation:** The Risk Management Committee defines monitoring criteria and processes, working alongside the Audit Committee to ensure risk management plans are successfully implemented and offer genuine protection.

Monitoring and Reviewing Code Compliance

The Company's Internal Audit department is responsible for monitoring compliance with this Code, reporting outcomes to the Audit Committee, and maintaining records regarding confirmed or potential code violations.

Every employee has a duty to cooperate by providing accurate, complete data to the Internal Audit department. The Company expects everyone to share responsibility in monitoring code compliance because acts contradicting the Code constitute working disciplinary breaches, potential legal violations, and destroy organizational values, impacting short-term and long-term corporate standing.

Employees are responsible for reporting immediately to the Internal Audit department, supervisors, or senior executives upon witnessing or suspecting code violations.

Supervisors and managers receiving employee reports have a duty to investigate, evaluate, and process violations to the fullest extent. If clear evidence reveals that a supervisor neglected or ignored employee reports, they shall face Company disciplinary actions, benchmarked against Article 157 of the Criminal Code regarding negligence of official duty.

Assessment and Review of the Code manual

The Internal Audit department is responsible for evaluating the presence and implementation of the Code of Conduct and Business Ethics annually, informing the Audit Committee of performance outcomes, obstacles, or commercial constraints. The Internal Audit department must review and update the Code manual annually to align with changing internal and

external factors, presenting revisions to the Audit Committee and the Board of Directors for subsequent approval.

Measures and Guidelines upon Receiving Grievances or Code Violation Leads

1) Grievance and Lead Processing:

- 1.1 **Fact Gathering:** The grievance recipient compiles facts relevant to the code violation personally or assigns an appropriate individual to proceed.
- 1.2 **Data Screening:** The recipient processes and screens data to determine appropriate handling methods for each matter, which may include:
 - 1.2.1 Processing the matter personally or assigning others to act if the topic falls within their authorized authority, or
 - 1.2.2 Reporting the matter to authorize and relevant personnel to screen and process data.
- 1.3 **Defining Action Measures:** Personnel operating under clause 1.2.2 define measures to halt code violations and mitigate damage for affected individuals. For material topics, the grievance recipient must report directly to the Audit Committee and/or the Board of Directors.
- 1.4 **Reporting Results:** The recipient reports action outcomes under clause 1.3 to the informant if they disclosed their identity.

2) Rights and Protection of Informants or Whistleblowers:

The Company pledges to hear all grievances equitably, transparently, and attentively, providing justice to all parties under reasonable investigation timelines. Informant identities shall remain confidential, protected from retaliation during and after investigations. Informants, whistleblowers, and fact-finding cooperators receive protection as follows:

- 2.1 Informants may choose anonymity if they deem disclosure unsafe or damaging. However, identity disclosure enables the Company to report progress or facts more rapidly.
- 2.2 The Company treats relevant data as confidential, disclosing it on a strict need-to-know basis, considering the safety of the informant, data source, or associated individuals.
- 2.3 If informants feel unsafe or face potential distress, they may request the Company to establish appropriate protection measures, or the Company may apply measures proactively.
- 2.4 Informants facing distress or damage shall receive appropriate and fair mitigation processes.

Misconduct Reporting Channels

Queries or grievances regarding code violations can be submitted independently through multiple channels, including telephone, fax, mail, email, or other electronic platforms to the following personnel:

1. Internal Audit Department
2. Managing Director
3. Chairman of the Board of Directors

Upon receiving a grievance, fact-finding investigations must be executed rapidly to resolve issues, backed by measures protecting the informant from any negative impacts.

Penalties

The Company shall seriously consider penalties against employees who violate the Code of Conduct and Business Ethics. Authority is granted to entities designated under Company announcements to consider faults and apply penalties in accordance with criteria and principles established within the Company Working Regulations.
