

SUPALAI

SUPALAI PUBLIC COMPANY LIMITED

CODE OF *SUPALAI* CONDUCT

**Code of Conduct for Directors,
Executives, and Employees**



Good Corporate Governance Motto



Good Corporate Governance Motto



G : Good

- To think good, speak good and do good is the foundation of positive thinking, which can be applied to work and to solve problems. This also helps reduce conflicts while enhancing smooth and successful interpersonal communication



R : Responsibility

- Act consciously
- Operate business with determination and dedication with all our ability
- Always learn to enhance capabilities



E : Equitable Treatment & Ethics

- Treat all relevant parties equally
- Adhere to moral standards and conduct business with fairness
- Taking into account all stakeholders, including community, society and environment
- Treating stakeholders equally and respecting human rights



A : Accountability

- Fulfill duties with utmost attention
- Be consciously aware of and carry out our tasks cautiously
- Bravely accept the consequences of our actions
- Adhere to and abide by applicable laws, rules and regulations



T : Transparency

- Operate business with transparency, disclosure of information and accountability
- Being committed to conducting business and driving sustainable operations
- All pieces of evidence and references can be traceable and accountable

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Code of Conduct

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The Company remains committed to ethical principles and legal correctness, while developing partners to cover good corporate governance throughout the Supply Chain to benefit all stakeholders and society as a whole. This is to lead Supalai forward with stable growth, driving environmentally friendly business operations and sustainable energy management.

SUPALAI

Message from the Chief Executive Officer

Supalai Public Company Limited realizes the importance of a good Code of Conduct in business operations, as it firmly believes that a good business Code of Conduct is an essential part that will help the Company's business operations succeed and build confidence among stakeholders, which will lead to quality and sustainable growth. The Company, therefore, established a Code of Conduct manual for directors, executives, and employees, providing for an annual review. A cartoon version of the Code of Conduct has been created, with content updated to be easy to understand, engaging to read, and consistent with good corporate governance practices and corporate governance principles, which are internationally recognized organizational management standards.

The Board of Directors prioritizes a good Code of Conduct in business operations by assigning policies to the Audit Committee, the Corporate Governance and Sustainability Committee, the Nomination and Compensation Committee, the Risk Management Committee, the Executive Committee, and the Management Committee. Furthermore, the Board has instructed the management to improve relevant operations to align with a good business Code of Conduct to strive toward international standards, as well as to be consistent with the Mission, which is to creatively and continuously develop product and service innovations for good performance, while considering the benefits of stakeholders, society, the environment, and governance.

The Board of Directors expects this Code of Conduct manual to serve as a guideline for the performance of all directors, executives, and employees, with the directors themselves acting as good role models. Therefore, employees should study and understand the various practices, especially those directly related to their own duties. In case of any doubts, they should consult their respective supervisors according to the hierarchy. The Company considers the practices in this Code of Conduct manual to be a part of the 'Work Regulations' that employees must follow, and disciplinary action may be taken if they neglect their duties. Therefore, employees should use the Code of Conduct manual as the foundation for their work in all cases.

Dr. Prateep Tangmatitham

Chief Executive Officer

Suggestions for using and promoting Compliance with the Code of Conduct

Persons with the duty to comply with the Code of Conduct

All directors, executives, and employees, including employees in subsidiaries, with the Board of Directors acting as good role models.



Recommendations

- 1) Understand the content and essence of this Code of Conduct.
- 2) Learn the content related to one's own duties and responsibilities.
- 3) Regularly review the knowledge and understanding of the content of this Code of Conduct.
- 4) Provide knowledge and understanding to other individuals who must perform duties related to the Company or who may affect the Company.
- 5) When there are doubts or questions, consult with a supervisor or the person designated by the Company to be responsible for monitoring compliance with the Code of Conduct through the various specified channels.
- 6) Notify a supervisor or the person in charge when witnessing a violation or non-compliance with the Code of Conduct.
- 7) Cooperate in investigating various facts with the agency or person assigned by the Company.
- 8) Supervisors at all levels must lead by example in complying with the Code of Conduct, as well as promote a work environment for employees and related persons to understand that following the Code of Conduct is the right thing to do and must be practiced.
- 9) All employees must take the Code of Conduct knowledge test, which covers good corporate governance, risk management, and anti-corruption.

Violations or Non-Compliance

The Code of Conduct for directors, executives, and employees is considered a form of discipline that all employees must maintain and strictly adhere to. Employees who violate or fail to comply will be subject to disciplinary action.

All directors, executives, and employees, including employees in subsidiaries, have a duty to comply and encourage others to comply with the Code of Conduct. The following actions are considered violations of the Code of Conduct:

- 1) Failing to comply with the Code of Conduct.
- 2) Suggesting, promoting, or supporting others to not comply with the Code of Conduct.
- 3) Neglecting or ignoring when witnessing a violation or non-compliance with the Code of Conduct in cases where one knows or should have known due to involvement with work under one's responsibility.
- 4) Failing to cooperate or obstructing the investigation to find facts regarding alleged violations or non-compliance with the Code of Conduct mentioned above.
- 5) Unfair actions towards others due to the lack of reporting in cases of non-compliance with the Code of Conduct.

In this regard, actions that fall under such Code of Conduct violations shall follow the consideration and punishment process according to the Human Resources Department's regulations. Furthermore, employees who violate the Code of Conduct may receive legal penalties if the action is a legal offense.

Therefore, executives, as supervisors, must monitor and advise subordinates to maintain their conduct strictly and may arrange for them to receive appropriate further development. Directors, executives, and employees must maintain their conduct and strictly comply.





Supalai Public Company Limited Commitment Form

Supalai Public Company Limited wishes for the directors, executives, and employees of Supalai Public Company Limited and its subsidiaries to study and understand this Code of Conduct manual and sign as a commitment through SPL consent management as follows:

- 1) I accept and agree to understand this Code of Conduct manual.
- 2) I accept and agree to adhere to this Code of Conduct manual in the parts related to my role as a director, or executive, or employee (as the case may be) as a principle for operations with the highest standards.

Please sign

Date

Signature

Position / Department

Objectives

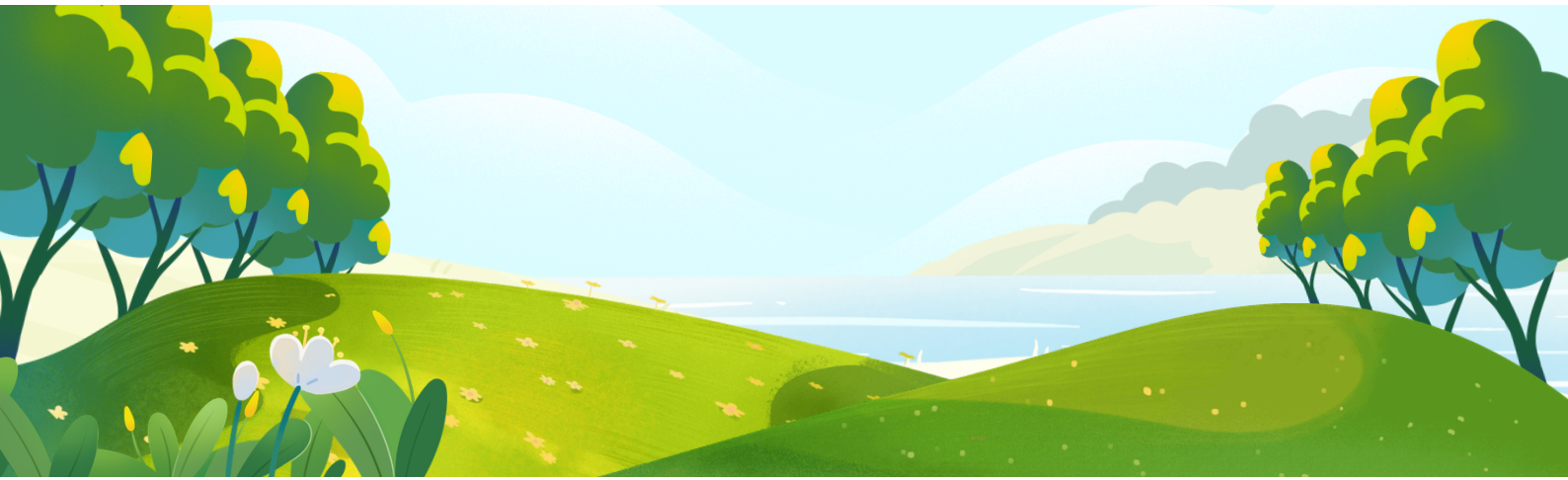
Supalai Public Company Limited is committed to conducting business to achieve good corporate governance, thus recognizing the importance of operating with honesty, transparency, and fairness to all related parties.

The Board of Directors has therefore established a set of practices as a "Business Code of Conduct" that demonstrates responsibility in business operations and business ethics for the employees of the Company and its subsidiaries. The Company intends for its personnel to have appropriate conduct, including treating all groups of stakeholders with honesty, integrity, transparency, and fairness, while strictly adhering to the Business Code of Conduct.

Furthermore, a policy has been established for executives to demonstrate their commitment to the Code of Conduct by acting as good role models, fostering a work environment conducive to following the Code of Conduct, while simultaneously striving to prevent any violations of the Code of Conduct from occurring.

Therefore, the Company has established this Business Code of Conduct or Ethics and Work Practices (Code of Conduct) for directors, executives, and employees of the Company and its subsidiaries to use as a guideline for conduct and practice, which will lead to the strengthening of a corporate culture that upholds good corporate governance principles.

Vision, Mission, Core Values, and Management Philosophy



VISION

Leader in sustainable real estate development with contribution to social and environmental improvement

MISSION

To continuously create and develop innovative products and services to bring the most value in the interests of our stakeholders social environment and governance

CORE VALUES

Growth Mindset

Self-development, idea development for mutual benefits

Dynamic

Agile, adaptable to all situations

Win Win

Win together

Innovation

Innovate, share, listen, try new things

Customer Centric

Respect and create customer satisfaction and responsibility for stakeholders, society, and environment

Legal and Corporate Governance

Emphasizing on legality, ethics and code of conduct

MANAGEMENT PHILOSOPHY

For quality society of "Supalai Residents", the Company is committed to developing quality residences, and continuing to innovate its products and services, while improving resident safety and comfortability, and striving to deliver professional and premium service in order to maximize customer satisfaction by adhering to the principles of management philosophy as follows:

S

Superiority

Excellence in terms of products, services, and good management

P

Profitability

Consider the benefits for all parties involved such as customers, shareholders, employees, contractors, partners and society

L

Longevity

Operation of sustainable and stable business

Sustainable Corporate Governance Policy and Anti-Corruption Policy

Sustainable Corporate Governance Policy

The Board of Directors of Supalai Public Company Limited realizes the importance of governance and social responsibility, believing that good governance is an essential part that helps the Company's business operations succeed. It builds confidence in having an efficient, transparent, and verifiable management system, which creates trust among shareholders, investors, stakeholders, and all related parties. This leads to quality and sustainable growth and creates added value for the business.

The Board of Directors understands the roles, duties, and responsibilities towards shareholders and various related parties. There is a determined intention to conduct business under good governance principles, following best practices or regulations of the Stock Exchange of Thailand and the Office of the Securities and Exchange Commission, as well as relevant regulations. Furthermore, the Board of Directors has established and reviewed various policies, including evaluating compliance with policies related to the 4 categories of corporate governance principles, consisting of:

- 1) Rights of Shareholders and Equitable Treatment of Shareholders
- 2) Consideration of the Role of Stakeholders and Sustainable Business Development
- 3) Disclosure and Transparency
- 4) Responsibilities of the Board of Directors

The Company has established an operational policy plan which includes the Anti-Corruption Policy, Corporate Governance Policy, and Risk Management Policy.

All directors, executives, and employees, including employees in subsidiaries and associates, must comply with the Corporate Governance Policy and all related policies.

Anti-Corruption Policy

The Company is committed to anti-corruption by not tolerating any form of corruption whatsoever. It requires personnel at all levels, including company directors, executives, supervisors, and employees working in the Company, subsidiaries, associates, or other companies where the Company has control, as well as persons involved in business operations, to strictly comply with the Anti-Corruption Policy. In this regard, the Company has communicated and publicized this to create knowledge and understanding among those involved with the Company. If company directors, executives, supervisors, and employees fail to comply with this policy, they will be subject to disciplinary action. The method of punishment will depend on the facts and surrounding circumstances.

In addition, the Company regularly assesses corruption risks that may occur in each process, finds appropriate solutions, and establishes channels for whistleblowing or filing complaints to the Company's independent directors in case of witnessing events or actions that suggest corruption or misconduct by individuals. Furthermore, the Company has declared its intention to join the Thai Private Sector Collective Action Against Corruption (CAC) to demonstrate its firm resolve in fighting corruption.



Definition

The Company

Supalai Public Company Limited

Subsidiary

Having a relationship in one of the followings:

- 1) A company that Supalai Public Company Limited has control over
- 2) A company that is under the control of the Company successively, starting from being under the control of the company according to item 1)

Director

The Board of Directors and Advisors to the Board of Directors of Supalai Public Company Limited and its subsidiaries

Employee

Permanent employees, special contract employees, and temporary employees of Supalai Public Company Limited

Executive

Management Committee of Supalai Public Company Limited and its subsidiaries.

Control

Having a relationship in one of the followings:

- 1) Having a relationship in one of the following manners: Holding shares with voting rights in a company exceeding fifty percent of the total voting rights of that company
- 2) Having the power to control the majority of voting rights in the company's shareholders' meeting, whether directly or indirectly, or for any other reason
- 3) Having the power to control the appointment or removal of directors from half of the total number of directors onwards, whether directly or indirectly

Code of Conduct

Good business practices established by the Company to maintain and promote its honor and reputation, set forth for directors, executives, and employees to use as guidelines for their performance



1 Inquiry, Providing Information, Suggestions, Notification, and Complaints

Persons who must comply with the Code of Conduct in this section

- Director
- Executive
- Employee



Definition:

Inquiry	means	method of seeking knowledge and understanding by the inquirer, as the inquirer has doubts and requires answers from the Company's executives.
Providing Information and Suggestions	means	Providing opportunities for employees to express opinions or provide information that is beneficial to the work processes or to the Company.
Whistleblowing and Complaints	means	Not receiving fairness or witnessing misconduct according to the laws, rules, and regulations of the Company, with the desire for the Company to investigate the facts in order to resolve the issues or punish the wrongdoers.

Guidelines:

1. Inquiry, Providing Information, Suggestions

If you wish to provide information, suggestions, or witness actions suspected of violating good corporate governance and business code of conduct, you can provide information and suggestions at

- Suggestion Box
- Send Email to Senior Executives: tritecha.tan@supalai.com or inquire for more information at
- Internal Audit Hotline: 0 2725 8888 # 81201
- Complain through Number 1720

2. Notification and Complaints

If you witness actions that violate good practices in the following matters:

- Violation of compliance with the principles and guidelines of the good corporate governance policy
- Violation of the Company's rules, regulations, and articles of association
- Receiving unfairness in work performance
- Acts of corruption
- Witnessing actions that cause suspicion and result in negative impacts on the organization, you can notify or complain to the Independent Directors at E-mail: anti-corruption@supalai.com

3. Measures for Protecting the Whistleblower or Complainant

The Company will keep the information and identity of the whistleblower or the complainant and the respondent confidential. If disclosure is necessary, information will be disclosed only as much as necessary, taking safety and damage into account. If the complainant or those who cooperate in the investigation of facts feel that they may be unsafe, they can request the Company to determine appropriate protection measures. Additionally, the Company will not take any action that is unfair to the whistleblower or the complainant, including changing job position, job nature, workplace, suspension from work, intimidation, obstruction of work, termination of employment, or any other action that is unfair to the whistleblower, the complainant, those who cooperate in the investigation, or employees who refuse corruption.



1

Inquiry, Providing Information, Suggestions, Notification, and Complaints

(Cont.)

Key Considerations:

1. Details of clues or complaints must be true, clear, or sufficient to investigate the facts for further action.
2. The whistleblower or the complainant can choose not to disclose their name, address, or contactable phone number if they deem that such disclosure will cause lack of safety or cause damage.

What would you do?



1. You witness an external contractor handing over an unnamed cash check to your colleague in an undisclosed location, which constitutes bribery and corruption. How should you proceed?

Guidance

You can report clues to the Company's Independent Directors via the Independent Directors' email. The Company has measures to protect whistleblowers and will not take any unfair action against such whistleblowers.

2

Respect and Human Rights

Persons who must comply with the Code of Conduct in this section

Director
 Executive
 Employee



Definition:

Joint Venture	means	Any company supervised by the Company to ensure compliance with the terms and conditions set forth in the Joint Venture Agreement, excluding the Company's subsidiaries.
Business Partner	means	Suppliers of goods and services to the Company, including labor and service contractors.
Stakeholder	means	Individuals or organizations involved in the Company's business operations, such as consumers, customers, communities, and civil society organizations, etc.

Guidelines:

1. Respect and comply with the Company's rules, regulations, and all applicable laws.
2. Regularly monitor, audit, and assess human rights risks and impacts. Establish appropriate risk management measures, with every department responsible for overseeing human rights risks arising from business operations and the value chain under their jurisdiction.
3. Regularly develop and implement a comprehensive Human Rights Due Diligence Process across the Company's operations and value chain. This includes risk assessment, identifying key issues, and taking action to mitigate risks to prevent human rights violations. Special focus must be placed on vulnerable groups, such as women, children, ethnic and religious groups, migrant workers, contract labor, local communities, the elderly, pregnant women, LGBTQ+ individuals, and customers, while integrating risk management, performance tracking, and transparent reporting.
4. Systematically apply the Human Rights Due Diligence Process to assess risks and impacts within the Company's future merger and acquisition (M&A) plans.
5. Develop two-way communication channels to promote human rights awareness and provide opportunities for employees and stakeholders to provide feedback, voice concerns, or report grievances regarding human rights violations.
6. Establish a robust verification process for human rights-related reports or complaints received from employees and/or stakeholders. These must be reported to the Board of Directors to ensure appropriate mitigation, remediation, or corrective actions are taken.
7. Communicate and pass on this policy to business partners and stakeholders to be used as management guidelines and to prevent operations related to human rights violations.
8. Promote and support business partners and stakeholders to participate in conducting business and missions ethically and with social responsibility to strengthen a culture of mutual respect, focusing on joint development toward sustainable growth.

2 Respect and Human Rights

(Cont.)

Key Considerations:

1. Refusing to work with any individual due to differences in mental or physical characteristics, as well as nationality, race, religion, gender, age, education, or any other matter.
2. Gossiping or mocking mental or physical differences, including nationality, race, religion, gender, age, education, or any other matter that may affect feelings.
3. Sending or distributing personal data to other persons.
4. Sharing personal data with various agencies or unrelated persons.
5. Disclosing employment information to those who are not involved.
6. Must respect the rights of and treat all shareholders equally, and must not perform any action in a manner that may cause a conflict of interest with the Company.
7. Business partners should not violate human rights, which can be established as criteria for selection and evaluation.

What would you do?

1. You are not the person who maintains employee history data, but you are the interviewer; therefore, you want to know the health check results of the job applicants to consider selecting individuals with appropriate qualifications. Can you request the records from the Human Resources Department?

Guidance

Health check results are considered personal data. If you wish to access them, you must obtain direct consent from the data subject, except in cases where the data is used according to the normal performance of duties by those responsible for maintaining the data.



2. An external organization is organizing an award ceremony and has selected the Company's Chief Executive Officer to receive an award. They called to request the CEO's biographical data to publish in a magazine. As the CEO's secretary, how would you proceed?

Guidance

The disclosure of others' personal data must receive direct consent from the data subject. Anyone who discloses others' personal data without permission must be responsible for any damages that may occur. Therefore, from the example above, you should obtain approval from the data subject before taking any action.

2.1

Promotion of Gender Equality and Women's Rights

Persons who must comply with the Code of Conduct in this section

- Director
- Executive
- Employee



Guidelines:

1. Set a target for women in management positions to be no less than 30%.
2. Have a recruitment and appointment process for employees at all levels that is fair, transparent, and free from gender bias.
3. Support the establishment of committees or bodies with gender diversity.
4. Ensure compensation and promotion opportunities follow the principle of equal pay for equal work.
5. Provide appropriate benefits for female employees, such as maternity leave and family care leave, flexible working policies, and physical and mental health support services.
6. Promote a mentoring system and specific potential development programs for women.
7. Support gender equality training for employees and executives, such as supporting learning from the real-life experiences of female leaders in the company and supporting women to advance into executive positions.
8. Have an anti-sexual harassment and discrimination policy, complete with clear disciplinary measures.
9. Establish independent complaint channels via internal systems and an external system, specifically Channel 1720, where complaining employees are protected from retaliation according to the Whistleblower Protection Policy.
10. Promote an organizational culture that supports diversity, equity, and inclusion.
11. Disclose information regarding the proportion of women in management positions, compensation, and career advancement within the organization in the annual report.
12. Establish a process for periodically evaluating and improving the policy by considering input from employees and stakeholders.
13. Establish clear disciplinary measures for discrimination and policy violations in accordance with the Company's regulations. The implementation of this policy is part of the commitment to sustainable organizational development, building confidence among investors, employees, and stakeholders in the long term.

2.1 Promotion of Gender Equality and Women's Rights (Cont.)

Key Considerations:

1. Avoid direct and indirect discrimination that results in any gender receiving fewer opportunities or benefits than another, whether in employment, promotion, or compensation.
2. Be cautious with the use of language or communication that reinforces gender bias in writing, speaking, and advertising; use gender-neutral terms and avoid reinforcing negative images or gender stereotypes.
3. Do not violate or exclude the rights of LGBTQ+ individuals; respect and treat individuals with gender diversity equally in all organizational activities.

What would you do?

1. A female employee in the company is not given opportunities for promotion to a higher position despite having good performance and full qualifications, while a male employee with similar experience is promoted.



Guidance

The company promotes equal promotion and career development based on performance and capability rather than gender, ensuring everyone has a fair opportunity to grow within the organization. Furthermore, performance evaluations are conducted transparently and fairly to ensure all employees feel equally supported.

2. A pregnant female employee is asked to work overtime and perform excessively heavy tasks, despite having a medical certificate stating she should avoid strenuous work or overtime during this period, leading her to feel unfairly treated. What should you do if you witness this situation?

Guidance

When you witness such an unfair situation, you can report it through Channel 1720. The Company has measures to protect whistleblowers and will not take any unfair action against them. Furthermore, the Company respects the rights of pregnant employees by providing support and adjusting workloads to suit their physical condition, without requesting heavy labor or overtime. Providing appropriate care and adjusting the work environment is essential to ensure all employees can work effectively and receive fair treatment.

2.2 Policy on Migrant Workers Recruitment

Persons who must comply with the Code of Conduct in this section

- Director
- Executive
- Employee



Guidelines:

1. Respect the rights of migrant workers and treat them humanely and with dignity, without discrimination, abuse, or harassment, including not imposing forced labor either physically or mentally, or in the form of slavery or human trafficking, in the processes of employment, payment of compensation, welfare, career advancement, disciplinary action, and termination of employment.
2. Have a process for the selection and hiring of migrant workers without seeking benefits that may constitute a violation of the rights of migrant workers which may lead to forced labor in all forms, and in compliance with the laws of the countries of origin, transit, and destination.
3. Establish selection criteria and arrange a bidding process for hiring migrant worker recruitment companies in a transparent manner, including providing guidance on migrant worker recruitment practices, traceability processes, and monitoring procedures in order to ensure that the operations related to recruitment, selection, employment, and repatriation of migrant workers by migrant worker recruitment companies comply with the relevant laws.
4. In the case of outsourcing and service contracting that involve the use of migrant workers, the Company must monitor, supervise, and inspect the operations of contractors or service providers to ensure compliance with the Company's policies and relevant laws.
5. Pay compensation and provide benefits and welfare to all migrant workers of the Company directly, regularly and on time, according to job level, using the same criteria in an equitable and equal manner.
6. Manage safety, occupational health, and the working environment of migrant workers in accordance with the laws, rules, and relevant standards in each country.
7. Promote and support training on workers' rights, working environment, and relevant laws in a language that workers understand before the signing of the employment contract.
8. Provide appropriate and accessible channels for complaints and whistleblowing for migrant workers.

2.2 Policy on Migrant Workers Recruitment

(Cont.)

Key Considerations:

1. Migrant workers must be treated humanely and with dignity, without discrimination, abuse, or harassment.
2. In cases where migrant workers are used through contractors, the employees involved must monitor, supervise, and verify that the contractors strictly comply with the Company's policies and the law.
3. Ensure that the payment of compensation and welfare is made on time and that the same criteria are applied as for other workers in an equitable manner.

What would you do?

1. An employee discovers that the selected labor recruitment agency has been deducting a commission from the wages of migrant workers every month, claiming it as a "maintenance and coordination fee." This results in the workers receiving less than the amount specified in their contracts. Should the employee remain silent, as it is considered an internal matter between the recruitment agency and the migrant workers?

Guidance

The Company has a policy to support ethical migrant labor recruitment and prevent exploitation or the abuse of power. Therefore, the Company must perform traceability and monitoring to ensure that the recruitment agency's operations comply with the law and international standards regarding recruitment fees. Consequently, the employee overseeing the contract must notify the recruitment agency to stop such actions immediately and investigate whether any fees have been charged in violation of the established criteria.

2. A supervisor at the labor camp discovers that a group of migrant workers is attempting to call Channel 1720 to report housing hygiene issues. Fearing it would damage the project's reputation, the supervisor prohibits the workers from using their phones during work hours and instructs them to report issues only through the supervisor. Is this practice correct?

Guidance

The Company must provide appropriate and accessible channels for filing complaints and reporting clues for migrant workers. Therefore, migrant workers are entitled to contact Channel 1720 to report clues and must be protected as complainants or witnesses.

3 Human Resources

Persons who must comply with the Code of Conduct in this section

- Director
 Executive
 Employee



Definition:

Human Resources means Directors, Executives, and Employees of the Company

Guidelines:

Conduct Toward Oneself

1. Everyone performs their duties with responsibility, honesty, and integrity, utilizing working hours efficiently and effectively, and shall not act or induce colleagues or subordinates to use working hours for other activities unrelated to the Company's interests.
2. Do not use one's authority, or allow others to exploit one's authority, whether directly or indirectly, to seek positions or any other benefits for oneself or others. Everyone should constantly seek additional knowledge and experience to enhance their capabilities and apply such knowledge and skills to their responsibilities for maximum benefit and efficiency.
3. Do not use one's authority, or allow others to exploit one's authority, whether directly or indirectly, to seek positions or any other benefits for oneself or others. Everyone should constantly seek additional knowledge and experience to enhance their capabilities and apply such knowledge and skills to their responsibilities for maximum benefit and efficiency.

Conduct Toward Supervisors and Subordinates

1. Do not discriminate against any individual based on personal relationships or any other matters unrelated to work performance.
2. Executives and employees must listen to the instructions of their superiors and shall not bypass their direct supervisor unless necessary or as instructed by a higher-level superior.
3. Executives and employees shall treat subordinates with kindness and fairness, providing care and fostering their professional growth by transferring knowledge, supporting training opportunities, and considering merit, rewards, and disciplinary actions fairly.

4. Do not behave in a manner that may tarnish one's own reputation or that of the Company.
5. Use and maintain the Company's assets for maximum benefit and do not use the Company's assets for personal gain.
6. Do not use the Company's name, logo, or symbols to request credit or other services, or to demand attention in a way that results in disgrace, damage, or negative impact on the Company's image.

4. Executives and employees shall listen to the opinions or suggestions of colleagues and subordinates regarding their duties and consider implementing them for the benefit of the Company's operations.
5. Executives and employees shall not withhold information necessary for work performance, and shall maintain and promote unity among colleagues while providing lawful assistance to one another for the benefit of the Company's operations.
6. Executives and employees shall treat colleagues with politeness, mutual respect, kindness, and good interpersonal relations, and shall adapt themselves to work effectively with others.
7. Refrain from any behavior that constitutes sexual harassment. Sexual harassment refers to any action that causes nuisance or creates a work environment that demoralizes, is hostile, or interferes with work performance. Such behaviors include molestation, obscenity, flirtation, or sexual advances, whether verbal or physical, as well as any other acts that infringe upon or threaten others.

3 Human Resources

(Cont.)

Key Considerations:

1. Do not use working hours or Company resources for personal gain.
2. Do not use the Company's name as a credit reference for purchasing goods or services.

What would you do?

1. Your close friend uses working hours to sell products for a direct sales company using the Company's assets, such as the telephone and email, and you have also been persuaded to purchase those products. How would you proceed?

Guidance

You should warn your colleague or report the matter to a superior so that your colleague does not use the Company's working hours for other activities or use the Company's assets for personal gain.

2. You want to purchase goods or services from a store. Can you use the Company's name to request credit or additional services from that store?

Guidance

You cannot use the Company's name for any transactions unrelated to the Company. Doing so may mislead others into believing the transaction is being conducted with the Company, which could result in damage to the Company.

3. You are the person responsible for maintaining employees' personal data, but another unrelated individual wishes to know employee information such as salary or health check results. How would you proceed?

Guidance

Salary information and health check results are considered personal data. Those responsible for maintaining the data or involved parties must use such information strictly according to their duties and responsibilities. They cannot use others' personal data inappropriately or in a manner that causes harm to the data subject.

4. You have a part-time teaching job outside of work hours and wish to use information or documents from your work with the Company as teaching materials. How would you proceed?

Guidance

You should consult with and obtain approval from your superior before using any Company information, except for information or documents that have already been disclosed to the public.

5. An external organization invites you to be a guest speaker during regular working hours and offers you a remuneration fee. How would you proceed?

Guidance

You should consult with and obtain approval from your superior before accepting the invitation to avoid any direct or indirect conflict of interest with the Company. Regarding the remuneration, you cannot accept it as you are using the Company's time for the speaking engagement. However, if you use your personal leave for the engagement, you may accept the remuneration.

4 Policy on the Offering or Acceptance of Gifts, Assets and Other Benefits

Persons who must comply with the Code of Conduct in this section

- Director
- Executive
- Employee



Definition:

Gifts	means	Items given on various occasions according to custom, tradition, or culture, or exchanged as a matter of social etiquette.
Assets	means	Tangible and intangible objects which may have a value and are capable of being owned.
Other benefits	means	Anything that has an impact on or provides an advantage to Directors, Executives, and Employees.
Stakeholders	means	Includes shareholders, customers, employees, business partners (creditors, contractors, vendors), competitors, and society.

Guidelines:

1. not demand for or accept gifts, assets or any other benefits from customers, business partners, contractors, or other parties related to the Company's business under any circumstances as this may affect the decision making of those who accept the gifts to be bias or discomfort or to have conflicts of interest.



2. The Company does not prohibit the production of gifts with the Company logo as long as they are produced on reasonable cause in compliance with business operations.

3. Offering gifts to a supervisor and accepting gifts from a subordinate should be avoided unless such giving and offering are conducted according to traditions and these gifts are not of high value. The accepted or offered gifts, assets or other benefits must not be illegal items.
4. In case there are offered gifts, assets or other benefits by a third party where an approval is needed yet the acceptance is undeniable, the recipient may accept the offer and must report the acceptance along with appropriate reasons to the supervisor immediately. As for accepting other forms of benefits such as hospitality or reception, the recipient must be able to prove that such acceptance does not involve an overspending or occur so frequently that it causes a commitment to such person, either directly or indirectly.

SUPALAI แนวปฏิบัติเมื่อมี บุคคลภายนอกมาให้ของขวัญ, ในแต่ละกรณี

- กรณีบุคคลภายนอกมอบของขวัญมาให้
ให้เจ้าหน้าที่แจ้งขอความเห็นชอบ "ไม่รับของขวัญมาจนใจ"
- กรณีบุคคลภายนอกมอบของขวัญมาให้
แจ้งให้ทราบถึงนโยบายว่าสื่อการรับ การให้ของขวัญ
หรือสินไหม หรือผลประโยชน์ของบริษัทฯ และขอให้
ผู้มอบของขวัญกลับ
- กรณีบุคคลภายนอกให้สินไหมหรือของขวัญกลับ
แจ้งผู้มอบว่า ของขวัญจะถูกรวบรวมไปบริจาคเพื่อการกุศล
หรือสาธารณประโยชน์ และให้เจ้าหน้าที่รับของขวัญมาส่ง
ของขวัญแก่ผู้รับบริจาค พร้อมเซ็นทะเบียน

1) สินไหมหรือสินไหมที่ได้รับมอบของขวัญจากบุคคลภายนอก ให้แจ้งให้ทราบ
ก่อนมอบของขวัญกลับ 2) ของขวัญที่ได้รับมอบให้นำไปบริจาคแก่หน่วยงาน
การกุศล

บุคคลภายนอก

4 Policy on the Offering or Acceptance of Gifts, Assets and Other Benefits

Key Considerations:

1. Making payments to individuals unrelated to the transaction in exchange for undue privileges or benefits.
2. Giving gifts or souvenirs to superiors.
3. Accepting gifts or souvenirs from subordinates.
4. Accepting items or gifts without a clear source or a justifiable reason for giving.
5. Accepting or giving items or gifts with a value exceeding what is considered normal or appropriate.

What would you do?

1. On New Year's Day, a supplier brings you gifts as per custom, including a New Year's gift basket, cakes, a gift voucher, and a Parker pen. How would you proceed?



Guidance

Decline the gifts to reduce the supplier's expense burden and express gratitude for their goodwill toward the Company.

2. A contractor you have previously worked with offers free international travel vouchers for you and your family's personal vacation. Can you accept this offer?

Guidance

As per the guidelines, you should submit such items to the central administration. Accepting these travel vouchers may affect your decision-making, leading to bias, discomfort, or a potential conflict of interest in the performance of your duties.

3. An external contractor is hosting a customer appreciation event at a hotel and has invited you to attend as a representative of the Company. Can you accept this invitation? Furthermore, if you attend the event and win a lucky draw prize valued at approximately 25,000 Baht, can you accept it?

Guidance

This example is divided into two cases: attending the event and receiving a lucky draw prize.

- Case 1 (Event Attendance): Upon consideration, if it is a general invitation where other customers are also attending, you may participate. However, you must first obtain approval from your superior.
- Case 2 (Lucky Draw Prize): You must surrender the prize won at the event to the central administration for gift registration, as its value exceeds 5,000 Baht.

5 Conflict of Interest

Persons who must comply with the Code of Conduct in this section

- Director
 Executive
 Employee



Definition:

conflict of Interest means Situations involving the use of one's position, whether directly or indirectly, to seek benefits for oneself, relatives, or any other persons.

Guidelines:

1. Do not operate competing business or the business of the same nature as that of the Company.
2. Do not enter into partnership or be shareholder with decision making power or be executive in competing business or the business of the same nature as that of the Company, however, in unavoidable cases, a report must be made to the supervisor immediately.
3. There shall be no exploitation of information or any event known according to one's duties and responsibilities.
4. Avoiding any activity which may cause conflict of interest with the Company or create any form of financial obligation with persons having business relations with the Company or other employees of the Company.
5. Avoiding doing the job other than that of the Company, which may have effect on one's responsible duties in any aspect.
6. The employees must not use the Company's property or information or any position in the Company to seek personal gain or for business competition against the Company.
7. All employees must inform the Company when there are circumstances to believe that there would be conflict of interest. If an employee suspects that there might be conflict of interest, such employee must report to the supervisor immediately and both the supervisor and the employee shall jointly consider whether there is conflict of interest or not by using "Form for Disclosure of Items of Conflict of Interest". Upon having received recommendations from the supervisor, such employees must submit a copy of the report to the Internal Audit Department.
8. Whenever it is found that there is business opportunity by using the property or information of the Company or their own positions in the Company, the employees must propose such opportunity to the Company first. In such case, the supervisor shall further propose to the management to consider whether the Company wishes to utilize such opportunity or not. If the Company waives the right to such opportunity, the employees can then use the opportunity according to the terms and conditions proposed, which must be in line with the ethical guidelines of the Company.

5 Conflict of Interest

(Cont.)

Key Considerations:

1. Do not be an owner or a partner with decision-making authority in any legal entity or group of persons engaged in a similar business, or acting as a competitor, business partner, or subcontractor of the Company.
2. Do not work for or provide consultancy services to other companies, legal entities, or businesses that are similar in nature, or are competitors, business partners, or subcontractors of the Company, unless assigned to do so for the Company's subsidiaries.
3. Ensure that family members—including parents, siblings, spouses, children, and children's spouses—do not engage in businesses similar to the Company, act as competitors or business partners, or serve as contractors, vendors, or subcontractors for the Company.
4. Throughout the period of employment and after its termination, employees must not use "customer data, customer payment history, or any business operational information" for personal gain, the benefit of others, or in any way that causes damage to the Company.

What would you do?

1. Your colleague is facing financial difficulties, and you have a significant amount of savings. Out of sympathy, you are considering lending money to your colleague at an interest rate lower than that of commercial banks. Can you do this?

Guidance

You should avoid such actions. Although the interest rate may not exceed the legal limit, lending money to a colleague could lead to a conflict of interest or disrupt the workplace atmosphere, especially in the event of a default or failure to comply with the loan agreement.



2. Before joining the Company, you co-founded a private company with a school friend. The nature of your private company's work matches the outsourcing requirements of the Company. You are considering having your friend contact the Company to bid for work. How would you proceed?

Guidance

You should avoid such actions, as accepting work from the Company may impact your job responsibilities and lead to a conflict of interest, even if your private company was established before you joined the Company. Furthermore, you must immediately report this matter using the Company's "Conflict of Interest Disclosure Form," attaching all relevant details for your superior's review and guidance. A copy must also be sent to the Internal Audit Department for acknowledgment. Additionally, you must recuse yourself and have no involvement in the selection process for said contractor.

3. If your relative participates in a bidding process with the Company, but you are not involved in the procurement, selection, decision-making, or approval process, are you still required to report this through the Conflict of Interest Disclosure Form?

Guidance

Even though you are not involved in the procurement, selection, decision-making, or approval process, the fact that there is a familial relationship means you must immediately inform your superior. This should be done using the Conflict of Interest Disclosure Form to eliminate any suspicion and to demonstrate transparency.

5 Conflict of Interest

(Cont.)

4. A contractor of the Company has invited you to attend a seminar abroad, with all expenses covered. They are also offering travel allowances for all participants and have agreed to let you bring your family along. Should you attend this seminar?

 **Guidance**

You should not attend the seminar, as the offer appears to be an excessive incentive. However, if the seminar is beneficial to the Company, you should seek approval from your superior and use the Company's funds by following the officially prescribed procedures. In any case, if the invitation is accepted, you must not bring your family or accept the travel allowance, as these are considered benefits beyond what is normally acceptable.

5. Can Directors, Executives, and employees of the Company serve as consultants for a private company that operates in the same line of business as the Company's current operations?

 **Guidance**

You cannot do so, as this is considered a conflict of interest arising from serving as a consultant for a business that competes with the Company.

6. An external contractor has invited you to a product launch event with a large number of attendees. The event includes souvenirs and a dinner hosted by the contractor. Can you accept this invitation?

 **Guidance**

In this case, you may attend the event and accept the souvenirs since the contractor intends to distribute them to all participants. During the dinner, you should avoid any discussion that could be misconstrued as an interest in or an intent to purchase the product. Furthermore, you should gather relevant product information and report it to your superior.

6.1 Use of Inside Information

Persons who must comply with the Code of Conduct in this section

- ✓ Director
- ✓ Executive
- ✓ Employee



Definition:

inside information means Information that has not yet been disclosed to the public or information intended solely for the Company's purposes and not for personal use. This includes information that the Company temporarily keeps confidential, such as financial statements or dividend payment details that have not yet been submitted to the Stock Exchange of Thailand (SET).

Guidelines:

1. Do not use inside information of the Company or business trading partners of the Company, that they know from performing duties, to purchase or sell or offer to purchase or sell, or persuade others to purchase or sell or offer to purchase or sell securities of the Company or those of the Company's trading partners for personal gains or for the gains of others. They shall also strictly comply with related laws.
Keep confidentiality of inside information under one's responsibility and shall not disclose such information to the public or other personnel of the Company who has no involvement.
2. A disclosure of information shall be made by authorized persons only. General personnel are not obliged to disclose the information. When asked to reveal information that they do not have authority to disclose, refer a question to the person in charge in order to provide accurate information and in the same direction.
3. Directors, executives and employees are due to take accountabilities on data protection and shall not exploit the inside information for personal gains even after resigning from the Company by arranging for an interview before resigning in order to return confidential information to the Company, and to remind resigning employee to continue to be responsible for the Company's confidential information after resigning. This shall be done by signing in a written acknowledgment.
Refrain from using inside information through the Company's communication channels, especially during significant corporate events such as the issuance of new shares or debentures.
4. Custodians of inside information must strictly instruct all related parties to comply with these regulations. Inside information must not be disclosed to the public and shall be shared only with relevant personnel on a "need-to-know" basis.
5. report on the change of securities holdings to the Securities and Exchange Commission Thailand and submit the copy of the report to the Company on the same day they submit the report to the Securities and Exchange Commission Thailand.
6. report on the change of securities holdings to the Securities and Exchange Commission Thailand and submit the copy of the report to the Company on the same day they submit the report to the Securities and Exchange Commission Thailand.

For Directors and Executives Only

1. report on the change of securities holdings to the Securities and Exchange Commission Thailand and submit the copy of the report to the Company on the same day they submit the report to the Securities and Exchange Commission Thailand.
2. report on the change of securities holdings to the Securities and Exchange Commission Thailand and submit the copy of the report to the Company on the same day they submit the report to the Securities and Exchange Commission Thailand.



6.1 Use of Inside Information

(Cont.)

- Upon becoming aware of essential inside information that has the influence on stock price and market capitalization must not buy or sell the Company's securities for one month prior to the disclosure of financial statement to the public and they shall not disclose such essential information to other people. During 30 days before the disclosure of the financial statements, the Company Secretary shall notify in writing to the directors, executives and related departments who know about inside information not to disclose inside information to outsiders or unrelated persons.

Key Considerations:

- Information must not be disclosed without proper authorization. If the disclosure of information affects the Company's securities price or causes the Company to suffer damages or a competitive disadvantage, the individual responsible shall be held legally liable.
- Avoid providing or spreading information based on rumors or any data that may negatively impact the Company's reputation or operations.
- Do not provide information to individuals claiming they have a right to know without clear evidence or a verified, justifiable reason.

What would you do?



- There are rumors that the Company will win a bid for a significant plot of land, causing the Company's stock price to rise sharply. In reality, the Company has indeed won the auction and is in the process of preparing a formal disclosure to the Stock Exchange of Thailand (SET). If you are aware of this information, can you trade the Company's shares?

Guidance

You must not purchase the Company's shares during this period. Additionally, you must not disclose this information or provide trading advice to external parties or unauthorized individuals. Such actions constitute the use of inside information for personal gain or the benefit of others, which violates the Company's Code of Business Ethics and is an offense under the Securities and Exchange Act. To avoid any allegations regarding the appropriateness of securities trading, you should wait until at least one day (24 hours) after the inside information has been officially disclosed to the public. This ensures that general investors have been thoroughly informed and have had reasonable time to evaluate the information.

- Can you exchange market information, such as industry growth rates, with a friend who works for a competing company?

Guidance


You may do so, provided that the information is general and does not include the Company's confidential data or information that could affect the Company's securities price—such as profit forecasts, dividend payments, or new investment projects. Furthermore, you must exercise caution during such conversations, as other relevant laws (such as Anti-Trust or Competition laws) may apply.

- If you become aware that the Company is about to hire a major contractor for a high-value skyscraper construction project—a contract set to be signed shortly—and you realize this may significantly drive up that contractor's stock price, can you purchase shares of that contractor's company?

Guidance

You must not purchase the contractor's shares during this period. Such an action violates the Company's Code of Ethics regarding the use of inside information for personal gain.

- In your opinion, is it necessary for departing employees to return confidential information to the Company and sign a written acknowledgment regarding the protection of Company secrets after their resignation?

 **Guidance** Yes, it is necessary. All confidential or material information is the sole property of the Company. The Company has established this as a policy and communicated it to all employees. Therefore, departing employees are strictly prohibited from disclosing important information to external parties.

6.2 Confidentiality and Data Protection

Persons who must comply with the Code of Conduct in this section

- Director
- Executive
- Employee



Definition:

Confidential Information means all business and technical information of the Company that is vital to creating and maintaining a competitive advantage. This includes all data that could be beneficial to competitors or, if disclosed, could cause damage to the Company or its customers.

Guidelines:

1. **Safeguarding Information:** Protect the confidential information of the Company and its business partners, unless disclosure is authorized or required by law. This obligation to safeguard information continues even after a Director, Executive, or employee has resigned from the Company.
2. **Unauthorized Disclosure:** Do not disclose information without authorization, as it may cause damage to the Company and its customers. Such disclosure may also result in legal liability for the Director, Executive, employee, or the Company itself.
3. **Unethical Acquisition:** Must not solicit, accept, or use competitive information that has been obtained through illegal means or unethical practices.
4. **Avoid Selective Disclosure:** Refrain from selectively disclosing sensitive financial information or matters related to public communications that may impact market conditions.
5. **Prohibition of Insider Trading:** Do not engage in private business or trade the Company's shares (or the shares of other companies) while in possession of inside information that has not yet been disclosed to the public, as this may affect the value of those shares.
6. **Email Security (Encryption):** When sending sensitive information via email to relevant parties, you should use encryption to prevent unauthorized access. The encryption password should be sent separately from the email containing the sensitive data.

Key Considerations:

1. Information acquired through the performance of duties is considered the Company's confidential property.
2. Disclosure of Company information—whether for commercial or non-commercial purposes—is strictly prohibited.
3. Do not disclose any Company information that has not yet been made public, especially information that could impact the value of shares traded on the Stock Exchange. Maintain the confidentiality of customers' information and do not use such data for your own benefit or the benefit of related parties through any wrongful or unethical means.
- 4.

6.2

Confidentiality and Data Protection

(Cont.)

What would you do?

1. Are Directors, Executives, and employees who have resigned still prohibited from disclosing confidential information? If they do disclose it, what are the penalties and liabilities?



✓ Guidance

Directors, Executives, and resigned employees must not disclose the Company's confidential information at any time (indefinitely). If such disclosure occurs and causes damage to the Company, the Company may consider taking legal action against that individual.

2. A close friend calls and asks you for a list of employees, customer names, and phone numbers. Can you provide this information to your friend?

✓ Guidance

You cannot provide the names and phone numbers to your friend. Such data is classified as personal information and must not be used for personal gain or for the benefit of related parties through wrongful means. Employees are permitted to use such information only on a "need-to-know" basis as strictly necessary for their assigned duties within the Company. Disclosing the Company's confidential information is a violation of the Code of Business Ethics and a breach of employee discipline, which will result in disciplinary action based on the severity and impact of the violation.

6.3 Public Disclosure and Information Dissemination

Persons who must comply with the Code of Conduct in this section

- Director
- Executive
- Employee



Definition:

Information Disclosure	means	The Company shall disclose business information, financial status, and operating results with accuracy, completeness, and timeliness. All information—whether positive or negative—must be presented realistically without exaggeration. The Company does not tolerate inaccurate, incomplete, or delayed reporting, as such failures could cause severe damage to the Company and result in legal penalties.
Material Information	means	The objective of this disclosure is to provide stakeholders with reliable information for decision-making, ensuring equal access to data, transparency, and confidence. All public communications must be managed through designated central units responsible for information dissemination.

Guidelines:

1. The Company's Board of Directors, executives, employees, contractors, and contractual parties must maintain the confidentiality of information, including Company documents. The disclosure of such information and documents is prohibited, except by individuals who have the right to disclose that information.
2. The disclosure of Material Non-public Information must be conducted and communicated to the public with caution, accuracy, completeness, and timeliness. Furthermore, actions must be taken to ensure that shareholders or investors receive information that is appropriate, sufficient, equal, and timely, with easy access to such data. This may include considering disclosure channels via the Company's website as appropriate. In this regard, careful consideration must also be given to the timing of the disclosure.
4. Disclosure of projections regarding business conditions, business directions, including the future operating results of the Company (Forward-Looking Information), must be conducted and communicated with caution, and must include explanations of the conditions or assumptions used in making such projections.
5. The disclosure of important information that has already been disclosed to the public (Material Public Information) must be conducted and communicated clearly and completely without causing confusion. Furthermore, providing additional information regarding material information that has already been disclosed must be clear and consistent, and must not cause misunderstanding of the previously disclosed information.

6.3 Public Disclosure and Information Dissemination

(Cont.)

5. The disclosure and communication of other information that is not important information (Non-material Information) must be disclosed based on the truth and must not have the intention of misleading others regarding facts about the financial status, operating results, or securities prices, or be disclosed in a manner that may cause others to understand that the securities price will increase or decrease.
6. The disclosure and communication of information in the case of financial reports should consider factors such as the evaluation results of the adequacy of the internal control system, the opinions and observations of the auditor, and the opinions of the Audit Committee, and must also be consistent with the objectives, main goals, strategies, and policies of the Company.
7. The disclosure and communication of information that may cause the Company to face business or competitive impacts must be handled with special caution, such as information concerning product costs, market share data, etc.
8. The Investor Relations department is responsible for communicating with and attending to general investors, securities analysts, shareholders, and investors, and serves as the center for disclosing important information to investors. It oversees the financial reporting process to demonstrate operating results, sales trends, and future project developments of the Company to both domestic and international shareholders, ensuring they are informed equally, consistently, and completely according to the truth, by disseminating information at appropriate times through various channels, including mass media, websites, telephone, the Stock Exchange of Thailand, and the Office of the Securities and Exchange Commission.

Key Considerations:

1. Avoid disclosing information that has not yet been notified to the Stock Exchange of Thailand and the Office of the Securities and Exchange Commission.
2. Disclose information through the system of the Stock Exchange of Thailand to ensure that the perception of information is thorough and equal.
3. The disclosure of information covers written documents, verbal communication, telephone, internet, press conferences, video conferencing, and providing information through government agency channels.
4. Persons who have the right to disclose important information to the public include the Chairman of the Executive Board, Vice Chairman of the Executive Board, Managing Director, Deputy Managing Director, and the Investor Relations Department.
5. Prohibit the disclosure of information during the 2 weeks before the Company is scheduled to disclose information.

What would you do?

1. Can executives provide information or opinions regarding the Company's quarterly/annual profits if interviewed by reporters about the Company's performance this year?



Guidance

Information regarding profits can be provided only in accordance with what has already been disclosed to the Stock Exchange of Thailand. It must be taken into consideration that such information must not cause damage to the Company or stakeholders, or be perceived as an attempt or incentive to influence the securities price.

2. If you are the person responsible for preparing information to be disclosed through the Stock Exchange of Thailand, who must review and screen that information?

Guidance

If such information is relevant to and impacts stakeholders, such as shareholders, joint venture partners, etc., it must receive approval from a resolution of the Company's Board of Directors meeting. However, if it is other information, it must receive approval from the Company Secretary and senior management before sending the information through the Stock Exchange of Thailand, after which it can then be disclosed on the Company's website.

6.4 Use and Safeguarding of Intellectual Property

Persons who must comply with the Code of Conduct in this section

- Director
- Executive
- Employee



Definition:

Information Disclosure means The Company shall disclose business information, financial status, and operating results with accuracy, completeness, and timeliness. All information—whether positive or negative—must be presented realistically without exaggeration. The Company does not tolerate inaccurate, incomplete, or delayed reporting, as such failures could cause severe damage to the Company and result in legal penalties.

Guidelines:

1. The employees who are employed by the Company, products or production procedures, findings and development, improvement or invention of products, process, procedures; or objects made, used, sold or developed by the employees relating to the work of the Company or expanded from the work of the Company shall be considered as the products or procedures of the Company, whereby the employees shall
 - disclosure about such products and / or development or improvement to their supervisor or the management of the Company completely and promptly.
 - acknowledge in writing that the ownership of such development, improvement, findings or invention shall solely belong to the Company.
 - assign the rights, ownership and benefits from the invention, findings or trade secret to the Company.
 - agree to deliver all documents and follow legal procedures deemed necessary by the Company, such as preparing and applying for a patent, trademark or copyrights of the invention, findings, trade secret mentioned above.
2. All employees have the duty to maintain the confidentiality of trade secret, namely, business information and all technical information of the Company by protecting confidential information or business partners of the Company.
3. The obligation to protect such information shall continue until after the employees have resigned from the Company. The disclosure of any information without permission and causing damage shall be subject to penalty according to the law. The employees shall not demand, accept or use business information acquired illegally or immorally.
4. The Company shall not infringe the copyrights, patents and trademarks of others.
5. All the employees shall use computer programs with the copyrights provided by the Company, and shall not install and use unlicensed computer software in the Company.



ทรัพย์สินทางปัญญา

6.4 Use and Safeguarding of Intellectual Property (Cont.)

Key Considerations:

1. The stating, presenting, or disclosing of the Company's information or documents in any form to unrelated persons, both inside and outside the Company.
2. The use of information that is confidential or is the right of others without receiving permission from the owner.
3. The hiring of, or collaborating with, or participating in projects with individuals, agencies, or juristic persons outside the Company without having a written agreement regarding intellectual property rights and the benefits arising from such intellectual property.
3. Protect the Company's assets by demonstrating attentiveness and the appropriate use of resources.

What would you do?

1. To help the Company save costs and for work efficiency, you have installed an illegal software disc onto the Company's computer that you use for work and shared it with other colleagues. Is this permissible?

Guidance

This should not be done, as it is a violation of the intellectual property rights of others, and the Company may face legal lawsuits, which could cause damage to the image and business operations of the Company.

3. Your close friend has asked for a copy of information regarding the Company's database to use for the benefit of working at another company.

Guidance

Information located on the Intranet system or the Company's database is the property of the Company. You must not disseminate it or disclose login information to persons outside the Company.

2. You have received an award from the "One Business One Idea" contest, which involved the discovery, development, and improvement of a product that helps the Company save costs. Do you believe that this intellectual property belongs to you, and what actions must be taken?

Guidance

"One Business One Idea" is the intellectual property of the Company. You must disclose information regarding the product and its development or improvement to your supervisor, assigning the ownership rights and benefits derived from the invention to the Company, along with delivering all related documents.



6.5 Recording, Reporting, and Document Retention

Persons who must comply with the Code of Conduct in this section

- Director
 Executive
 Employee



Definition:

Recording, Reporting, and Document Retention means Every employee has a duty to ensure that information related to their work is kept in a secure condition and can be used for reference or for the benefit of the Company when needed, and is not used for their own benefit or the benefit of others. Furthermore, recording or reporting must be performed accurately according to the established systems.

Guidelines:

- The employees who are employed by the Company, products or production procedures, findings and development, improvement or invention of products, process, procedures; or objects made, used, sold or developed by the employees relating to the work of the Company or expanded from the work of the Company shall be considered as the products or procedures of the Company, whereby the employees shall
 - disclosure about such products and / or development or improvement to their supervisor or the management of the Company completely and promptly.
 - acknowledge in writing that the ownership of such development, improvement, findings or invention shall solely belong to the Company.
 - assign the rights, ownership and benefits from the invention, findings or trade secret to the Company.
 - agree to deliver all documents and follow legal procedures deemed necessary by the Company, such as preparing and applying for a patent, trademark or copyrights of the invention, findings, trade secret mentioned above.

- If you need to destroy documents, what should you do?

Guidance

You must inspect all documents and prepare a list or a document destruction log as evidence before disposal. This ensures that no documents which have not yet reached their retention expiration are mistakenly destroyed. Additionally, labels must be attached to the boxes indicating what the documents are while awaiting destruction.

Key Considerations:

- The preparation of information, documents, or financial reports that are inconsistent with the facts.
- The lack of risk prevention measures in managing information to prevent it from being destroyed or lost.
- The destruction of documents without knowing the details of the documents to be destroyed.
- The recording of false statements or facts that have no supporting evidence.

What would you do?

- Your friend is late in clearing advanced payments and has attached an accommodation expense claim using a temporary receipt, claiming they forgot to request an official receipt. In your capacity as the person responsible for recording the Company's expenses, what should you do?

Guidance

Based on the aforementioned case, it is divided into 2 cases:

- Case 1: Inform your friend that being late in clearing advanced payments requires written approval from a supervisor.
- Case 2: Regarding expense supporting documents, advise your friend to request a copy of the accommodation receipt from the place they stayed. In the event that a receipt cannot be obtained, prepare a payment receipt attached with a copy of the recipient's identification card, certified by a supervisor, along with a supporting memorandum.



7.1

Corporate Sustainability Management

Persons who must comply with the Code of Conduct in this section

- Director
 Executive
 Employee



Definition:

Responsibility to Community, Society, and Environment means conducting business under ethical principles and good management by being responsible for society and the environment, leading to sustainable development.

Guidelines:

1. Instill and raise awareness among all Board of Directors, executives and employees regarding sustainable development so as to achieve a balance in terms of economic, social, environmental as well as good corporate governance. This would help create a sustainable culture of business practices.
2. Operate by focusing on the efficiency of resource utilization as well as the reduction of energy usage, and minimizing environmental impact to the community, society, environment and quality of life of the people.
3. Operate in compliance with the laws, regulations, standards or agreements relating to the Company's business in all aspects.
4. Arrange projects and activities to develop communities within the project area and the society in general. It also focuses on developing and improving the quality of life, the conservation of nature and environment, culture, and the development of community's economy.
5. Communicate with the communities in the project area and is ready to listen to constructive feedback and comments to create benefit for the community.
6. Focus on creating understanding, communication and transparency of information disclosure to the society and stakeholders, namely, shareholders, customers, suppliers and business alliances regarding its status and facts on the Company's operations, its responsibility toward the community, society. The Company shall also be cooperative in providing information for investors, shareholders and the general public in a timely manner.
7. Provides supports to public activities, which are beneficial to the community, the society and the environment in order to bring about development and self-reliance on a sustainable basis.
8. Support a culture of learning and innovation in all its systems in order to gain body of knowledge and create new process and new products that can meet the needs of all stakeholders in economic, social and environmental aspects.
9. Launch campaigns to provide supports to create social, environmental and natural resource awareness among all levels of employees through activities, training session seminars and continuous participation as members of other agencies or organizations.
10. Raise awareness and urge suppliers and business alliances to adopt sustainable practices in their businesses in order to create economic, social and environmental balance.

7.1

Corporate Sustainability Management

(Cont.)

Key Considerations:

1. Ignoring community complaints.
2. Disseminating inaccurate information to the public.
3. Using natural resources inefficiently.

What would you do?

1. Can executives and employees propose social responsibility projects?



Guidance

Executives and employees can participate in activities through the Supalai Relation Club. The club is open to executives and employees providing opinions on conducting social responsibility activities to develop various club activities that are organized continuously every year. Alternatively, proposals can be submitted through the suggestion box as an additional channel.

7.2

Social Management

Persons who must comply with the Code of Conduct in this section

- Director
- Executive
- Employee



The Sustainable Social Policy has been established to govern and promote a corporate culture of social and community responsibility. It requires the organization and its personnel to consider the impacts on stakeholders arising from the organization's activities comprehensively and across all dimensions.

Guidelines:

Business Operations under Business Ethics and Corporate Governance Principles

1. Focus on conducting business with honesty, integrity, fairness, and professional ethics, with a firm commitment to operating in accordance with the law, commercial ethics, and fair competition principles, including accurate and timely tax payments. In this regard, the Company promotes and instills awareness among personnel at all levels regarding the importance of social responsibility.
2. Operate under the principles of Good Corporate Governance with responsibility toward shareholders. The Company shall respect the rights of shareholders and treat all shareholders equally; provide sufficient information for investment decisions or regarding significant changes within the Company; and shall not disclose internal information to any person in a manner that would cause damage or disadvantage to shareholders. There shall be transparent and verifiable management and determination of remuneration for directors and executives. Furthermore, financial reports and non-financial information shall be prepared and disclosed accurately, completely, and in a timely manner, according to generally accepted standard formats.

Anti-corruption

1. Manage business operations based on transparency and ethics, complying with policies and laws related to the prevention and countering of bribery and corruption, as well as the giving or receiving of bribes or inappropriate benefits to or from government officials or the private sector. The Company has established an organizational structure with clear divisions of responsibilities, work processes, and chains of command in each department to ensure appropriate checks and balances and rigorous mutual oversight. In this regard, the Company has prepared an Anti-Bribery and Corruption Measures Manual, which compiles policies, codes of conduct, rules, regulations, and operational procedures for directors, executives, and employees of the Company to adhere to. The Company has demonstrated a firm intention to oppose corruption by declaring its commitment to the Thai Private Sector Collective Action Against Corruption (CAC).

Respect for Human Rights

1. Adhere to human rights principles and maintain policies that support and respect the protection of human rights. This is achieved by treating all stakeholders—whether they are employees, the community, or the surrounding society—with respect for human dignity. Consideration is given to equality and equal freedoms, without violating fundamental rights or engaging in discrimination regardless of race, nationality, religion, language, skin color, gender, age, education, physical condition, or social status. This includes ensuring that the Company is not involved in any human rights violations, such as child labor, forced labor, and sexual harassment.

7.2

Social Management

(Cont.)

Fair Labor Practices

1. Respect employees' rights in accordance with labor laws and human rights principles, embrace diversity, and do not engage in discrimination.
2. Provide fair recruitment processes and employment conditions, including the determination of compensation and performance recognition under a fair performance appraisal process.
3. Promote personnel development by organizing training and seminars, as well as sending personnel to attend academic seminars and training in various related fields to develop their knowledge, capabilities, and potential. This includes instilling a positive attitude, morality, ethics, and teamwork among personnel.
4. Provide various welfare benefits for employees as required by law and beyond legal requirements, including providing various types of financial assistance to employees, etc.
5. Provide annual health check-up services for personnel at all levels of the Company, considering risk factors based on each individual's level, age, gender, and work environment.
6. Ensure that employees can work safely and maintain good workplace hygiene by establishing accident prevention measures and fostering safety awareness among employees. This includes providing training, promoting good hygiene, and ensuring the workplace remains sanitary and safe at all times.
7. Provide opportunities for employees to express opinions or file complaints regarding unfair treatment or wrongful acts within the Company, including providing protection for employees who report such matters.

Responsibility to Customers

1. Deliver high-quality products and services that meet or exceed standards, ensuring customers receive maximum benefits and satisfaction.
2. Provide accurate, complete, and undistorted information regarding products and services, without making false claims or exaggerating quality.
3. Strictly comply with terms and conditions agreed upon with customers. In cases where compliance is not possible, the Company must promptly notify the customer to find a mutual solution.
4. Maintain customer confidentiality and do not use customer information for the benefit of oneself or the Company, or for any wrongful purpose, unless required

Responsibility to Business Partners and Competitors

1. Adhere to fair contractual obligations with business partners and strictly comply with established anti-corruption measures. Respect the property rights and ownership of business partners, refrain from taking unfair advantage, and encourage partners to engage in social responsibility activities in collaboration with the Company.
2. Conduct business competition fairly by avoiding any acts of harassment, exclusion, or any actions prohibited by law and ethics that would hinder fair competition. Furthermore, promote free competition and refrain from any actions that cause market price distortion, which would result in negative consequences for consumers.

Environmental Conservation

The Company prioritizes social responsibility regarding environmental care and the avoidance of environmental destruction. The Company operates and controls its product manufacturing to strictly comply with environmental protection laws and establishes proactive measures for operations that may impact the environment. Furthermore, the Company emphasizes the efficient use of resources and energy by reducing consumption to only what is necessary, as well as promoting reuse and recycling. Regarding waste, the Company responsibly and effectively reduces, eliminates, or repurposes waste generated from the production process.

7.2

Social Management

(Cont.)

Promoting Innovation for Social Responsibility

1. Maintains a policy to provide assistance and support social development by collaborating in various activities with surrounding communities in areas where the Company operates, as appropriate.
2. Promote local employment by providing job opportunities within the organization and respond to events affecting the community, society, and the environment resulting from the Company's operations with speed and efficiency.

Furthermore, the Company encourages its employees to have a sense of consciousness and responsibility toward the environment and society. The Company will also collaborate with other groups or networks to develop targeted communities or societies each year.

Promoting Socially Responsible Innovation

1. Encourage employees to create innovations that align with the aforementioned social responsibility policies, such as natural resource and energy conservation, waste management, and emission control. These innovations may vary in level, including new creations, improvements, modifications, or transitions to achieve greater efficiency or effectiveness. Furthermore, the Company will disclose innovations that benefit society and the environment as appropriate, in order to inspire other businesses to consider implementation or further development.

Monitoring and Reviewing Social Responsibility Policy

1. The Company recognizes the importance of continuous operations with social responsibility. We will monitor, evaluate, and review all currently supported projects and will carefully consider future social responsibility initiatives on a continuous and regular basis. This process is conducted through reviews by the assigned sub-committees, with subsequent reports provided to the Board of Directors for their acknowledgment.

Key Considerations:

1. Avoid actions that conflict with ethical principles and transparency; do not seek illicit interests or benefits.
2. Avoid giving or receiving bribes and refrain from the abuse of power or position at all levels.
3. Avoid discrimination, human rights violations, or the unequal treatment of any individual.
4. Prohibit the use of illegal labor; appropriate welfare must be provided, and labor must be protected according to standards.
5. Avoid the misuse of information, unfair attacks on competitors, or taking any improper commercial advantage.
6. Promote energy efficiency and the appropriate management of waste.
7. Avoid projects that may adversely affect the community; instead, foster collaboration with local stakeholders.
8. Avoid developments that violate ethics or compromise the safety of users.
9. Avoid maintaining outdated policies without regular evaluation and updates to ensure they remain modern and effective.



What would you do?

1. The Company organized a CSR activity to distribute supplies to the community without a preliminary needs assessment. Consequently, the distributed items were impractical and did not meet the actual needs of the local residents.



Guidance

The Company should coordinate with community leaders or local organizations prior to conducting activities to identify their actual needs. This ensures that assistance is targeted, effective, and sustainable.

7.3 Environmental Management

Persons who must comply with the Code of Conduct in this section

- Director
- Executive
- Employee



Guidelines:

1. The Company integrates environmental policy as a core part of its business operations, covering the procurement of eco-friendly materials, production, product delivery, marketing and sales, and after-sales service. This extends to supply chain management and waste disposal, with a primary focus on minimizing environmental impact and promoting conservation. Furthermore, the Company addresses climate management and climate change adaptation in alignment with its greenhouse gas reduction targets. We also prioritize the preservation of biodiversity and ecosystems through the efficient and responsible use of resources.
2. Establish an environmental management system as an integral part of business operations, including continuous development and system audits to enhance environmental performance.
3. Conduct materiality assessments for sustainable development and establish environmental and climate management frameworks. This includes defining Key Performance Indicators (KPIs) and strategies to achieve operational targets.
4. Strengthen knowledge and awareness regarding environmental and climate management among employees, customers, business partners, and all relevant stakeholders.

Key Considerations:

1. Every department must participate in reducing energy consumption and carbon footprints, and must report performance results transparently.
2. Avoid setting ambiguous targets; use measurable indicators (KPIs) that are directly linked to the organization's strategy.
3. Avoid partnering with business partners who lack environmental standards, as this may indirectly impact the Company's reputation and accountability.



What would you do?

1. An internal department disposed of hazardous waste together with general waste without any segregation.

Guidance

Provide employee training on waste segregation and provide specific bins for each waste type. Furthermore, ensure that the transportation to disposal sites is monitored and conducted strictly according to regulatory requirements.

7.3.1

Environmental Sustainability Policy

Persons who must comply with the Code of Conduct in this section

- Director
- Executive
- Employee



The Sustainable Environmental Policy is established to require the organization and its personnel to consider the environmental impacts arising from the organization's activities comprehensively and across all dimensions.

Guidelines:

Biodiversity

1. Prevent and mitigate the impacts of business operations on biodiversity.
2. Promote the conservation and restoration of green spaces, ecosystems, and local flora and fauna.
3. Create shared value with communities and stakeholders surrounding project areas.

Climate Change

1. Establish guidelines for the Company and its personnel to manage factors related to climate change and global warming arising from business processes. This ensures that operations are conducted in accordance with the Company's requirements, remain verifiable, and align with international standards, namely FTSE and GRI. The policy is categorized into two sub-policies:
 - Energy Management
 - Greenhouse Gas (GHG) Management

Environmental Management

Establish guidelines for the Company and its personnel to manage factors related to climate change and global warming arising from business processes. This ensures that operations are conducted in accordance with the Company's requirements, remain verifiable, and align with international standards, namely FTSE and GRI. The policy is categorized into two sub-policies:

- Energy Management
- Greenhouse Gas (GHG) Management

Resource and Waste Management

1. **Inbound Material Management:** Require the identification of significant materials, the use of recycled or recyclable materials, and the setting of targets to reduce resource consumption from primary sources.
2. **Waste Management:** Require the collection of waste data, the setting of waste reduction targets, and the establishment of formal waste management procedures.
3. **Pollution Management:** Require the collection of pollution data, the setting of pollution reduction targets, and the development of pollution management protocols.
4. **Water Management:** Require the collection and reporting of water usage data, the definition of water reduction guidelines, and the formulation of water management action plans.
5. **Supportive Policies for Material, Waste, and Water Management:** Require the assessment of financial figures related to the impacts of resource usage, waste, and pollution. This includes supporting research and development (R&D) to mitigate such impacts.

7.3.1

Environmental Sustainability Policy (Cont.)

Key Considerations:

1. Avoid unauthorized encroachment or expansion of areas. Before any site improvements or modifications around project areas, an assessment must be conducted to ensure there is no adverse impact on the existing ecosystem or local flora.
2. Exercise caution against unnecessary resource consumption from the initial stages (e.g., oversized packaging or unnecessary document printing). Current guidelines emphasize "setting reduction targets from primary sources" rather than merely managing issues at the end-of-pipe.



What would you do?

1. Architects and engineers are designing the common areas of a single-house project that contains existing large trees.

Guidance

The road layout and house positions should be designed to preserve and integrate existing large trees rather than cutting them down. Additionally, selecting local ornamental plants for landscaping is recommended to attract indigenous birds and insects, helping to sustain the original ecosystem. This practice constitutes the "conservation and restoration of green spaces and ecosystems."

2. At a condominium construction site, there is a large amount of scrap metal and timber formwork remaining from beam casting. How should this be managed?

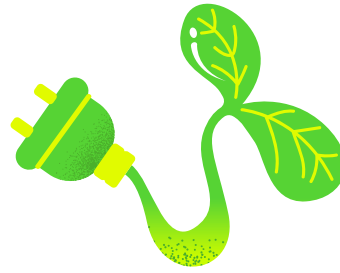
Guidance

Employees should be trained on waste segregation and provided with specific containers for each waste type. Furthermore, the transportation of waste to disposal sites must be monitored to ensure full compliance with established regulations.

7.4 Resource Efficiency

Persons who must comply with the Code of Conduct in this section

- Director
- Executive
- Employee



Definition:

Resources means Resources refer to everything surrounding us that can be utilized for consumption and daily use. These can be modified, transformed, and leveraged to support livelihoods, ensuring a life of happiness and convenience.

Key Considerations:

1. Maximize resource efficiency by ensuring lights and electrical appliances are not left on when not in use.
2. Avoid selecting raw materials or supplies that harm the environment, such as non-biodegradable or non-recyclable materials.
Control and reduce construction waste at the source to minimize environmental impact from the beginning of the process.

Guidelines:

1. Promote and support design, research, and development (R&D) of the Company's products to prioritize energy conservation and environmental protection.
2. Enhance resource efficiency by establishing related policies, including: Vehicle Usage Policy, Electricity Usage Policy, Air Conditioning Usage Policy, Office Equipment Usage Policy, Water Usage Policy, Waste Reduction and Recycling Policy. These policies aim to ensure that natural resources, materials, and equipment are used with maximum efficiency and effectiveness.
3. Collaborate in various campaigns and activities as designated by the Company.

What would you do?

1. You discover that certain work processes within the Company involve inefficient resource usage. As a person responsible for ensuring compliance with Company policies, what should you do?



Guidance

Report the findings to your direct supervisor and collaborate to identify more efficient resource management methods and measures. These proposals should then be presented to Senior Management for policy approval, eventually establishing them as Standard Operating Procedures (SOPs) within the Company.

7.5

Occupational Health and Safety

Persons who must comply with the Code of Conduct in this section

- Director
 Executive
 Employee



Definition:

Occupational Health, Safety, and Working Environment means Actions or working conditions that are free from any causes of danger to life, body, mind, or health resulting from or related to work activities.

Guidelines:

1. Strictly comply with all laws, regulations, acts, and official government announcements regarding occupational health, safety, and the working environment, including all internal company policies, to ensure the safety of life and property—for oneself, the Company, and others.
2. Propose suggestions or feedback to improve the working environment and ensure safer work practices.
3. Maintain cleanliness and orderliness of the workplace at all times.
4. Organize documents and personal items systematically at all levels to reduce search time and cultivate discipline in workplace maintenance.
5. Monitor and evaluate the implementation of the Occupational Health, Safety, and Working Environment Policy to ensure serious commitment and maximum efficiency.
6. Continuously improve safety operations, occupational health, and the working environment. Support and promote safety activities to achieve the highest practical results for all parties involved.

Key Considerations:

1. The non-reporting of accidents that occur in the workplace.
2. Safety in working, hygiene of employees, and the maintenance of the working environment are the duties of every employee at every level.
3. Every employee must consider the safety of themselves, colleagues, as well as the property of the company as important at all times while performing work.
4. Every employee will not ignore in the case that any accidents or disasters occur that affect the safety and hygiene in the workplace, by providing assistance to those affected as quickly and to the full extent of their ability, including searching for causes and defining preventive and corrective measures to prevent recurrence.



7.5

Occupational Health and Safety

(Cont.)

What would you do?



1. If you are assigned to perform work, and you later find that the working area has unsafe working conditions, or it is a risky task because you lack knowledge or have never received necessary training, which may lead to a dangerous situation, what should you do?

✔ Guidance

You should inform your supervisor, and the supervisor reports the unsafe working conditions to the Occupational Health, Safety, and Working Environment Committee to review and resolve the problems from such unsafe working conditions, and provide training.

2. If you find a suspicious object or person in the company area, what should you do?

✔ Guidance

You should report to your supervisor or inform the Safety Committee.

3. If you find that the workplace preparation or work procedures are in an unsafe condition, what will you do, and what should the contractor do?

✔ Guidance

You should report to the engineer or supervisor to proceed with notifying the contractor to improve and correct for safety immediately, and the supervisor reports the unsafe working conditions, along with corrective guidelines, to the Occupational Health, Safety, and Working Environment Committee for acknowledgment.

8 Treatment of Stakeholders

Persons who must comply with the Code of Conduct in this section

- Director
 Executive
 Employee



Definition:

Stakeholders means Various groups that are affected or may be affected by the operations and the success of the company, including shareholders, customers, employees, business partners, competitors, and creditors.

Guidelines:

Shareholders

1. Respect the rights and treat all shareholders equally, and do not perform any actions in a manner which may cause a conflict of interest with the Company.
2. The Company conducts business with honesty, integrity, and transparency, has responsibility towards shareholders, and discloses information to shareholders accurately, completely, and sufficiently for investment decisions, with standards under the framework of the law, ethical principles, and good corporate governance guidelines to protect and increase the maximum benefits of the shareholders.
3. Do not seek benefits for oneself and related persons by disclosing any internal information of the Company that is confidential and/or has not yet been disclosed to the public to third parties, which will lead to the disadvantage of the Company.
4. Submit reports on the status and operating results of the Company, including information technology, to all shareholders equally, consistently, in a timely manner, accurately, and completely according to the truth, and in accordance with relevant laws.
5. Facilitate and encourage all shareholders, including shareholders who are institutional investors, to attend the Company's shareholders' meetings, with supervision to comply with policies to conduct shareholders' meetings in accordance with the law and shareholders' meeting guidelines.

Customers

1. Treat customers equally and fairly based on the foundation of receiving fair returns for both parties and deliver quality products at a fair price.
2. Committed to procuring, developing, and producing quality products to meet customer needs and providing after-sales services to facilitate customers efficiently.
3. Study, evaluate, and improve the impacts of products that may occur to customers regularly, as well as supervise products to have quality that meets standard requirements, consumer protection laws, or other related laws.
4. Consider the safety of customers so that they receive quality products and safety according to international safety standards.
5. Provide accurate, sufficient, and useful information for customer decision-making without exaggerating the truth or intentionally concealing content, or providing false information, or intentionally misleading customers, which causes customers to misunderstand the quality or any conditions of the products.
6. Respect the personal rights of customers, including protecting the private information of customers by not disclosing the private information of customers to third parties according to various related laws.

8

Treatment of Stakeholders

(Cont.)

1. Contracts between the Company and customers are in accordance with the criteria prescribed by law, with accurate and sufficient information and agreements, without setting unfair conditions or violating the rights of customers, as well as strictly complying with contracts or various agreed-upon conditions, and in the event that any of the conditions cannot be complied with, the Company will proceed to notify customers as quickly as possible.
2. Provide systems and channels for customers to complain about product quality and efficient service, so that the Company can prevent and resolve problems for customers quickly and appropriately, as well as use such information to further improve or develop the products and services.

Employees

1. Promote and develop every employee to have knowledge and ability up to the maximum potential of the employee through the Individual Development Plan (IDP).
2. The Company supports receiving learning and development in both management skills, teamwork, and specialized professional skills.
3. The Company provides training by personnel from both inside and outside (In-House and Outside Training) to increase the potential for employees.
4. Promote employees to have creativity through various forms of activities so that employees can fully demonstrate their potential in moving towards professional success.
5. Organize activities to create unity within the Company regularly.
6. Provide opportunities for employees to express opinions or complain about unfair treatment.
7. Termination of employees must be carried out responsibly, transparently, and considering the social and economic impacts on the employee.

Competitors

1. Treat trade competitors within the framework of good competition etiquette and oppose unfair competition; promote free competition. Do not perform any actions to cause market price distortion which causes negative effects to consumers.
2. Do not seek confidential information of trade competitors through fraudulent, dishonest, or inappropriate methods, or those contrary to ethics and any laws.
3. Do not act intentionally to destroy the reputation of trade competitors by accusing or slandering in a damaging way, or using various tactics without claimable information.
4. Do not perform any actions that are an infringement of intellectual property and copyrighted works of others or trade competitors.
5. Do not treat trade competitors by using monopoly methods to force partners to sell products only to the Company.

Business Partners

1. Treat business partners equally and fairly, based on the foundation of receiving fair returns for both parties.
2. Do not solicit, do not receive, and do not pay any dishonest benefits in trading with business partners; if it is found that any solicitation, receipt, or payment of dishonest benefits has occurred, details must be disclosed to the business partner, and the problem must be jointly resolved fairly and quickly. Have selection criteria that are transparent, fair, and non-discriminatory; business partner selection criteria are reviewed periodically, along with business partner evaluation and the preparation of contracts according to agreements.
3. Support the selection of business partners throughout the supply chain who pay attention to and have concrete operations related to environmental issues (Green Procurement), such as construction materials certified with environmental label criteria, and business operations that have social responsibility and good governance principles.

8 Treatment of Stakeholders

(Cont.)

5. Have a management and tracking system to ensure that contract conditions are strictly complied with and to prevent corruption at every step; in the event that any condition cannot be complied with, must quickly notify the business partner in advance to jointly consider finding a solution using the principle of reasonableness.
6. Establish measures for auditing and screening the Company's business partners, such as contractors and hired parties, as well as support doing business with partners who operate fairly, have no human rights violations, and are aware of social responsibility.
7. Define a payment policy to pay business partners on time without delay when the delivery of goods and services is in accordance with the jointly agreed conditions; the payment period is consistent with the trade credit (Credit Term Policy), and the consideration of trade credit for each partner will consider various factors such as the duration of doing business together, the quality and standards of products and services, and past performance evaluation results of the partner, combined with adhering to the principle of fairness.
8. Do not cooperate with or support any person or business partner who does business illegally or is a threat to society and national security.
9. Committed to maintaining sustainable relationships with business partners and providing mutual trust.
10. Promote the potential and ability of business partners by collaborating to develop products, services, or innovations that are beneficial to business operations according to sustainable development principles with responsibility towards society and the environment.

Creditors

1. Strictly comply with contracts and various agreed-upon conditions; in the event that any of the conditions cannot be complied with, must quickly notify the creditor as soon as possible to jointly consider finding a solution using the principle of reasonableness.
2. Do not perform any fraudulent actions in trading with creditors.

**No
Corruption**



3. Committed to strictly complying with various conditions toward creditors, whether regarding the purpose of fund usage, loan repayment, security quality maintenance, guarantee conditions, capital management, and measures to prevent debt default.
4. Do not cooperate with or support any person or organization that conducts illegal business or is a threat to society and national security.
5. The Company is committed to maintaining sustainable relationships with creditors and providing mutual trust.

Key Considerations:

1. Conflicts of interest may occur in the selection of sellers of goods or services, such as accepting inappropriate gifts.
2. Selecting business partners who are relatives or have close relationships.
3. Performing transactions where the background history of the counterparty is unknown.

8 Treatment of Stakeholders

(Cont.)

What would you do?



1. If you are assigned to select a business partner in a bidding process, where one of the potential candidates is your relative's company, how should you act?

✓ Guidance

Because you have a close personal relationship with one of the business partners, which may make you unable to remain neutral as you may fall into a situation that could cause a conflict of interest, you should consult your supervisor and must not participate in the business partner selection process, or have your relative's company withdraw from the bidding.

2. If you are invited by a trade competitor to meet and exchange opinions regarding marketing plans and customer groups, how should you act?

✓ Guidance

You should refuse to participate in the conversation on such issues and inform the trade competitor that it is the Company's policy to prohibit employees from exchanging opinions on such issues, and report the occurrence to your supervisor for acknowledgment.

3. A shareholder telephones you to inquire about outsourcing procurement information, such as the shop name, contract price, etc. As the person receiving the call, how should you proceed?

✓ Guidance

Apologize to the shareholder and inform them that you do not have the authority to report or notify them, because it is the Company's policy to prohibit the disclosure of internal information without permission.



4. If the regulatory agency of listed companies changes laws or new criteria that listed companies must comply with, and senior management assigns your department to be responsible, as a supervisor, how should you act?

✓ Guidance

Request approval to attend training courses related to the assigned work by requesting approval according to the external training process with the Human Resources Department, because the Company promotes attending both internal and external knowledge training to develop every employee to have knowledge and ability up to the maximum potential of the employee.

9 Internal Control

Persons who must comply with the Code of Conduct in this section

- Director
 Executive
 Employee



Definition:

Internal control means Work processes or operational methods jointly established by directors, executives, and employees to provide reasonable assurance that, if followed, will lead to the achievement of the Company's objectives in Operations, Financial Reporting, and Compliance with laws, policies, and Company regulations.

Guidelines:

1. Directors, executives, and employees prioritize internal control and recognize the importance of risk management and the adequacy of internal control. Every department of the Company must understand the Company's business, including regulations, requirements, operational processes, and duties and responsibilities related to their performance of duties, by adhering to good internal control practices as a principle for conducting business and as a standard of conduct for employees.
2. Directors, executives, and employees strictly, consistently, and continuously comply with relevant regulations, requirements, and various codes of conduct, including reporting information regarding violations or non-compliance with various regulations to supervisors or relevant departments, and do not support the circumvention of regulations or operational processes, or avoid any actions that may affect the business's reputation.
3. Directors and executives cooperate with internal auditing by providing information, documents, and various evidence used in the audit, as well as not concealing, distorting, or falsifying documents, or interfering in the audit steps and processes.
4. Directors, executives, and employees recognize the importance of various risk factors that may affect the success of set goals by strictly following work practices and risk management policies, including reporting and identifying risks that may occur to the Company to their supervisors.
5. Executives and employees ensure that there is accurate and appropriate monitoring and evaluation of performance to allow for timely improvements and corrections, by reporting to their respective supervisors in order of hierarchy.
6. Directors, executives, and employees provide suggestions to improve internal control to be appropriate for changing situations, environments, and risk factors.

9

Internal Control

(Cont.)

Key Considerations:

1. Failure to comply with relevant rules, regulations, requirements, and various codes of conduct.
2. Lack of awareness regarding the importance of risk management and the adequacy of internal control.

What would you do?



1. Who is internal control related to, and whose responsibility is it?

Guidance

Internal control is the responsibility of everyone in the organization; it is not the responsibility of any single department.

2. If you find areas for improvement in the work process you are responsible for, what should you do?

Guidance

You should express your opinions to your supervisor, relevant departments, and the Organization Development Department so that the suggestions can be used to improve the systems and work processes to be more efficient.

3. What are the components of the Company's internal control system?

Guidance

1. Control Environment: To ensure that directors, executives, and employees have knowledge, ability, integrity, and professional ethics.
2. Risk Assessment: A mechanism for identifying, analyzing, and managing risks in various activities across all tasks of the organization.
3. Control Activities: The policies, regulations, requirements, and various procedures that management has established for compliance, in order for operations to achieve objectives.
4. Information & Communication: A system that enables directors, executives, and employees to receive sufficient, accurate, and timely information to perform work or manage operations correctly and up to date with events.
5. Monitoring & Evaluation: Refers to the tracking and evaluation of steps, processes, and operations.

10

Political Support

Persons who must comply with the Code of Conduct in this section

- Director
- Executive
- Employee



Definition:

Political Support	means	<p>Promoting and supporting political activities in accordance with the democratic system, including the political participation of directors, executives, and employees; however, this does not include providing political assistance in any form, both directly and indirectly, both financially and in other forms, to favor business interests or the acquisition of contracts. Other forms of assistance are as follows:</p> <ul style="list-style-type: none"> • Providing goods or services. • Advertising, promoting, or supporting political parties. • Purchasing tickets to events organized by political parties for fundraising. • Donating money to organizations with close relationships with political parties. • Using areas inside buildings or surrounding areas that are the Company's property, including the head office building and various Company projects. • Supporting lobbying that lacks appropriate principles and reasons, which is lobbying through personal relationships or offering reciprocal benefits. • Supervisors or employees at all levels ordering or persuading, by any means, employees and subordinates to participate in all types of political activities.
Political Participation	means	<p>Providing opportunities for directors, executives, and employees, whether as individuals or groups, to participate in any activity, whether directly or indirectly, in the form of joint awareness, joint thinking, or joint action in matters that affect themselves or the community; such actions must be done in their own name, using their own resources, outside of the Company's working hours, and are prohibited from using authority, financial resources, and the Company's name for solicitation or in political activities so that the Company is involved in or provides support to any particular political party.</p>

10 Political Support

(Cont.)

Guidelines:

1. Able to exercise one's own political rights according to the course of the law by expressing, participating, and supporting political rights outside of working hours, using only one's own resources.
2. Supervisors and employees of all levels shall not order or persuade, by any means, employees or subordinates to participate in all types of political activities, which may cause internal conflict within the organization.



What would you do?

1. If there is a political assembly organized according to democratic principles, can you participate in the assembly?

Guidance

You can participate in political assemblies according to the democratic system if it does not affect working hours, or if you exercise the right to leave for appropriate reasons. Furthermore, you must not claim employee status of the Company in a way that could mislead the public into understanding that the Company supports, is involved with, or is biased toward a political group.

Key Considerations:

1. Wearing the employee uniform or dressing in a manner that leads others to understand that one is an employee of the Company while performing duties related to politics or any political party.
2. Relationships with politicians or individuals associated with politicians that may lead to a misunderstanding of being biased toward a political party.

2. Can you run as a candidate for the Sub-district Administrative Organization (SAO) election?

Guidance

You cannot run for election, even if it does not affect your working hours. This is to prevent potential conflicts of interest that may occur or to prevent misleading the public into understanding that the Company supports, is involved with, or is biased toward a political group.

11

Anti-Money Laundering

Persons who must comply with the Code of Conduct in this section

- Director
 Executive
 Employee



Definition:

Money Laundering means The process of converting money or assets obtained from committing an offense, or acquired illegally according to the 11 categories of predicate offenses, which include:

- | | |
|--|--|
| 1) Narcotics | 6) Criminal association / Racketeering |
| 2) Illegal trade in women and children | 7) Customs smuggling |
| 3) Public fraud | 8) Terrorism |
| 4) Embezzlement or fraud by executives | 9) Gambling |
| 5) Abuse of official position | 10) Vote buying and selling |
| | 11) Human trafficking |

to change their state into money or assets that appear to be legally acquired, with the objective of paying expenses linked to illegal activities, investing in further illegal activities, and utilizing the benefits arising from such illegal acts.

Money Launderer means Any person who provides assistance in money laundering to criminals.

Guidelines:

- Obtain complete identification documents from contracting parties (individuals and legal entities) and identify the history of the source of funds.
- Verify the accuracy of information and supporting evidence for identification within the scope of honest and diligent practice, without gross negligence. The Company is prohibited from allowing customers to conceal their real names, use aliases, or use false names in conducting transactions.
- Reject or terminate relationships and refrain from conducting transactions with foreign contracting parties that are established without a physical place of business and are not in a position to be legally supervised in that country.
- Conduct credibility checks on foreign business partners before commencing a transaction relationship.
- In the event that an unusual transaction is detected, it must be reported to the supervisor immediately.

11

Anti-Money Laundering

(Cont.)

Key Considerations:

1. The contracting party attempts to conduct transactions with large amounts of cash or cash equivalents instead of wire transfers or checks as per general practice.
2. The contracting party attempts to request payment in large amounts of cash or payment via foreign wire transfer in foreign currencies.
3. The contracting party attempts to make payments before the due date.
4. The contracting party delays the identification process or is unwilling to provide complete or accurate information.
5. The contracting party purchases project products in amounts that exceed the customer's financial standing.
6. The contracting party requests to transfer money to an unknown account associated with the contracting party.

What would you do?



1. The creditor requests to transfer the debt payment to an unknown third party who is not associated with the contracting party.

Guidance

Do not transfer money to any person not specified in the contract under any circumstances, and report to the supervisor immediately as it is considered an unusual transaction.

2. A customer, whose occupation is a company employee, purchases multiple houses and informs the Company that on the ownership transfer date, they will pay for the houses with cash or cash equivalents.

Guidance

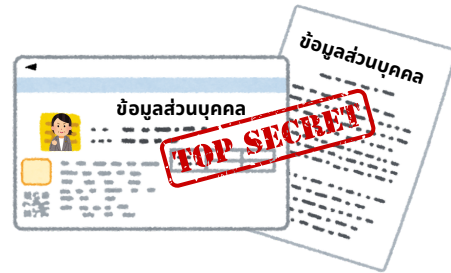
Verify the accuracy of information and supporting evidence for identification, and investigate the history of the source of funds within the scope of honest and diligent practice. Report to the supervisor immediately, or if there are any doubts, consult the Company's Legal Department, as the payment for the products exceeds the customer's normal financial standing and the feasibility of the source of funds.

12

Personal Data Protection

Persons who must comply with the Code of Conduct in this section

- Director
- Executive
- Employee



Definition:

Personal Data	means	Information relating to a person which enables the identification of such person, whether directly or indirectly, but not including the information of deceased persons in particular.
Sensitive Personal Data	means	Personal data regarding race, lineage, political opinions, cults, religious or philosophical beliefs, sexual behavior, criminal records, health data, disability, labor union information, genetic data, biometric data, or any other information which may lead to unfair discrimination against the data subject or affect the data subject in the same manner as prescribed by personal data protection laws.
Data Subject	means	A natural person who is the owner of personal data, including customers, business partners, service providers, shareholders, directors, officers, employees, visitors, and any other natural person whose personal data is collected, used, or disclosed by the Company.
Data Controller	means	A person or legal entity that has the power and duty to make decisions regarding the collection, use, or disclosure of personal data.
Data Processor	means	A person or legal entity that performs activities regarding the collection, use, or disclosure of personal data according to the instructions of or on behalf of the Data Controller, provided that such person or legal entity performing these activities is not the Data Controller.
Data Protection Officer (DPO)	means	A natural person or legal entity tasked with supervising, providing advice, and auditing the operations of the Data Controller and Data Processor, as well as serving as a coordinator to cooperate with the Office (of the Personal Data Protection Commission).
Consent	means	Consent: The manifestation of intent by the data subject to agree to the collection, use, or disclosure of their personal data, which may be in written or electronic form, unless such consent cannot be requested in those forms by its nature.
Privacy Notice	means	Privacy Notice: Detailed information for notifying data subjects about the collection, use, or disclosure of personal data, including personal data management, data subject rights, personal data retention periods, destruction of personal data, and contact channels for the Data Protection Officer.

12

Personal Data Protection

(Cont.)

Data Subject Rights	means	The rights of the data subject to manage their own personal data, such as the right to access personal data, the right to request the sending or transferring of their personal data to other persons, the right to object, the right to request disclosure of the acquisition of their personal data, the right to request erasure, destruction, or suspension of the use of their personal data, and the right to keep their data up-to-date.
Personal Data Breach	means	The leakage or violation of personal data security measures, resulting in damage, loss, alteration, or unauthorized disclosure.
The Personal Data Protection Commission (PDPC)	means	Tasked with operations regarding personal data protection, performing academic and administrative work for the Commission, with the Secretary-General of the Office of the Personal Data Protection Commission acting as the executive manager.
Legal Basis	means	The grounds recognized by law that allow for the collection of personal data under personal data protection laws.

Guidelines:

Directors

1. Establish personal data protection policies and guidelines.
2. Supervise and ensure that policies are implemented in a concrete manner.

Employees

1. Use personal data with caution and strictly comply with the law, rules, and regulations of the Company.
2. Immediately notify the Data Protection Officer (DPO) upon discovery of any leakage or violation of personal data.
3. If any actions are found that may constitute a violation of this policy, report them through the Company's whistleblowing and complaint channels.

Executives

1. Establish procedures and measures for personal data storage appropriate to the context of each company, in accordance with the policies, guidelines, laws of each country where the company operates, and international standards.
Establish a responsible structure to oversee operations to ensure compliance with procedures. Provide a selection system for persons or legal entities that have standardized and legally compliant data protection systems, in cases where the Company hires other persons or legal entities to act on its behalf regarding personal data.
2. Supervise compliance with policies, guidelines, and procedures, as well as develop and improve operational methods for efficiency, and ensure regular performance reporting.

Data Protection Officer (DPO)

1. Control and audit the Company's operations to ensure compliance with the law, including organizing awareness-building activities and training related to personal data operations.
2. Provide advice and guidance to the Board of Directors, executives, and employees on proper legal compliance.
3. Serve as the central point of contact for personal data matters and the protection of data subject rights, as well as coordinating and cooperating with the Office of the Personal Data Protection Commission.
4. Maintain the confidentiality of personal data known or acquired as a result of performing duties.

12

Personal Data Protection

(Cont.)

Key Considerations:

1. The Company will not collect personal data of customers, service users, or stakeholders from sources other than directly from the data subject.
2. Personal data of customers, service users, or stakeholders that has been collected will not be used for purposes other than lawful purposes or for the Company's business operations.
3. The Company will not sell, transfer, or disclose such data to third parties, unless consent has been obtained from the data subject only.



What would you do?

1. If a data subject (customer, service user, or stakeholder) wishes to know, delete, rectify, or inspect their personal data, or requests not to receive any marketing communications, what must the Company do?

Guidance

The data subject can submit their request and verify their true identity in writing to the Company. Once the Company has received such a request, the Company will notify them of the existence or details of the data within a reasonable timeframe.

13

Cybersecurity Operations

Persons who must comply with the Code of Conduct in this section

- Director
- Executive
- Employee



Definition:

The Company's data network means Programs or computer systems that support internal operations, such as E-mail, Intranet, ECM, ERP, DCC, etc.

This policy is established to ensure the security of the computer data systems of Supalai Public Company Limited, to mitigate risks from cyber threats, computer viruses, and malicious intruders, and to reduce the risk of misusing information technology systems which could lead to illegal acts and reputational damage to the organization. Furthermore, to achieve maximum efficiency and effectiveness for the Company and its employees, this Information Technology Security Policy (IT Security) has been formulated in accordance with the ISO 27001 security framework. Cybersecurity compliance monitoring shall be conducted as follows:

Cyber Threat Response

The Company has integrated Cloud Computing for business-critical systems to mitigate risks and ensure business continuity. This is implemented alongside a strong emphasis on Cybersecurity, through strategic planning and the deployment of multi-layered security measures, including:

- Virtual Private Network (VPN) implementation
- Privilege reviews and access control management
- Website access control via Firewalls
- Comprehensive Log management and retention
- Monitoring and detection of email-based threats (Phishing)

Governance and Risk Detection

The Company has established a Cybersecurity Committee in accordance with the Personal Data Protection Act to oversee data security and ensure effective alignment with cybersecurity standards. The Company also fosters cybersecurity awareness among employees at all levels, emphasizing potential threats, data leakage processes, and the possibility of data breaches within various operational contexts. This includes rigorous IT vulnerability testing and management to analyze, monitor, and alert for anomalies, enabling the timely implementation of initial corrective measures.

Response and Recovery

The Company has established a Disaster Recovery Plan (DRP) to mitigate the impact of system or data failures, ensuring that systems can be restored within a minimal timeframe (2 hours). This is achieved through data recovery from backups maintained in accordance with the Data Backup Plan to prevent business disruption. Regular backup and recovery drills are conducted to ensure constant readiness and optimal operational efficiency.

13

Cybersecurity Operations

(Cont.)

Guidelines:

Internal Computer Data Network Usage

1. Exercise caution when accessing the Company's computer network; users must not allow others to use their individual User Accounts to access the system.
2. The Company's computer network must not be used for the following purposes:
 - Conducting private commercial activities or any other activities unrelated to the Company's business operations.
 - Disclosing confidential information acquired during the course of work, whether it belongs to the Company or third parties.
 - Disrupting or obstructing the Company's network operations or preventing any user from performing their normal activities.
 - Posting personal opinions related to the Company's operations on any website in a manner that causes, or may potentially cause, damage to the Company.
 - Engaging in any other actions that may conflict with the Company's interests, business operations, or result in damage to the Company.
3. Requests for Remote Network Access (VPN) must be approved by the authorized person of the user's department and the Information Technology Department. The IT Department will determine access rights based on necessity and appropriateness.

External Computer Data Network Usage

1. External parties permitted to access the system include software developers/contractors, business partners, vendors, and special customers who have received approval from the respective department's executive management.
2. Any external party accessing the Company's computer data network must sign an acknowledgment to comply with the Company's Information Technology Policy and must clearly specify the duration of their system access.

Key Considerations:

1. Access to the internet or external networks must be conducted solely through the channels designated by the Company. No peripheral devices, whether wired or wireless, shall be used while the computer is connected to the Company's internal data systems. Personal data or information non-essential to work should not be stored on central file servers or personal computers, in order to optimize storage capacity and resources.
2. Access to the Company's computer network must be strictly limited to the assigned privileges. Users must not attempt to access the system using the credentials or privileges of others.
3. In the event of an approved request for external parties to use the Company's equipment or network, the requester must acknowledge and share responsibility for any actions taken by such parties while accessing the Company's computer data system.
4. Before using any data storage media, such as thumb drives or other portable devices, within the Company, users must perform a malware scan using the standard antivirus software provided by the Company every time.
5. Avoid providing Company email addresses on websites unnecessarily, as this can lead to spam mail or various forms of external cyberattacks.

13

Cybersecurity Operations

(Cont.)



What would you do?

1. If it is necessary to use an application or computer network that is unrelated to one's own work processes, or to access data under the responsibility of another department, can such access be granted immediately?

Guidance

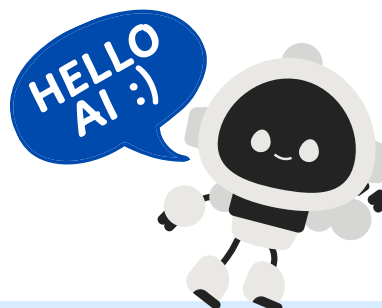
A formal request for application access must be submitted. This request requires approval from both the user's direct supervisor and the executive management of the department responsible for those specific processes or data. The Information Technology Department will then configure the access rights strictly according to the granted approvals.

14

AI Data Governance

Persons who must comply with the Code of Conduct in this section

- Director
- Executive
- Employee



The Company recognizes the paramount importance of data protection and internal data privacy. To mitigate the risk of data breaches, a strict policy regarding AI Usage and Machine Learning has been established. This ensures that the Company's data is utilized securely and remains under the organization's oversight and control.

Guidelines:

AI Data Sources

- AI Learning must exclusively utilize data authorized by the Company.
- The use of Company data with public or external AI systems that are not under organizational control is strictly prohibited.
- Data used for AI development must undergo verification and receive formal approval from the responsible department before implementation.

Internal AI Usage

- The Company shall exclusively utilize AI systems developed or procured by the organization.
- The use of external AI sources is strictly prohibited without prior verification and approval from the relevant departments.
- All AI systems must incorporate robust data leakage prevention measures, such as data encryption, access control, and regular security audits.

Control and Monitoring

1. The Company will continuously monitor and evaluate AI usage to ensure strict compliance with this policy.
2. Periodic security audits of AI systems will be conducted. Furthermore, relevant employees are required to undergo training on data security and the appropriate utilization of AI.

14

AI Data Governance

(Cont.)

Key Considerations:

1. Internal company data must not be used for AI training on external platforms or any other platforms not under organizational control.
2. The use of sensitive information—such as customer data, financial records, and strategic information—with unauthorized AI systems is strictly prohibited.
3. Should there be a necessity to use external AI systems, prior approval from executive management is required at all times.



What would you do?

1. When an employee is required to prepare minutes for a Board of Directors meeting (or any meeting involving sensitive information) and wishes to utilize AI for audio recording and summarization, is this permitted?

Guidance

Employees are strictly prohibited from using AI to record or summarize Board meetings or any meeting containing sensitive information without prior authorization. Such actions require formal approval from executive management. Furthermore, only AI systems developed or procured by the organization may be used. The chosen AI must be certified to meet the Company's stringent data security standards and policies without exception.

15

Persons who must comply with the Code of Conduct in this section

- Director
- Executive
- Employee



The promotion and development of innovation encompass fundamental benefits that positively impact the Company, its customers, employees, society, communities, and the environment. We are committed to maintaining product quality standards, enhancing corporate image and value, and delivering service excellence to ensure maximum customer satisfaction. This commitment extends to the efficient use of resources and the continuous improvement of operational processes to maximize overall efficiency.

Guidelines:

1. Promote the integration of innovation into real estate development to meet market demands while delivering superior customer experiences and ensuring the well-being of communities and the environment.
2. Establish innovation strategies and plans, with appropriate allocation of resources including budget and personnel.
3. Foster a culture of innovation by providing employees with opportunities to demonstrate their creative capabilities, leading to continuous improvement in products and services. This includes technical training on emerging technologies and real estate trends, as well as initiatives that encourage creativity and experimentation, such as the annual "Supalai Innovation Awards."
4. Promote digital transformation by implementing technologies that optimize internal processes and benefit customers, such as mobile application development and on-site skill-building activities, aligning with the "Innovation" pillar of the Company's sustainability strategy.
5. Advocate for sustainable and green innovations through the use of eco-friendly materials and construction methods, as well as energy-efficient designs, such as energy-saving home models.
6. Strengthen collaborations with external organizations, including public and private sectors (partners), to co-create high-efficiency innovations.
7. Establish governance through defined success metrics for innovation projects, implementing monitoring and evaluation systems, and reporting progress to executive management and relevant committees.

Key Considerations:

1. Innovations that do not align with actual user needs.
2. Technology implementation without considering user readiness.
3. Performance metrics that are inconsistent with actual goals.
4. Innovations that are environmentally harmful or conflict with sustainability principles.

15

Innovation Promotion and Development

(Cont.)



What would you do?

1. The Company has begun integrating digital technologies into the design and construction processes. However, it was found that operational staff lack a clear understanding of system usage, while the traditional design team remains attached to conventional working methods.

Guidance

Implement a systematic digital technology training program for employees, covering everything from fundamental principles to practical applications. This includes appointing a team of "Super Users" to act as intermediaries in transferring knowledge to other teams. Furthermore, establish "Sandbox" environments or pilot projects to allow employees to practice without impacting live operations. Progress should be monitored closely, supported by accessible consultants or user manuals to build confidence and maximize the adoption rate and efficiency of new technologies.

16

Risk Management

Persons who must comply with the Code of Conduct in this section

- Director
- Executive
- Employee



Guidelines:

1. Establish a standardized risk management process across the entire organization. Implement integrated Enterprise Risk Management (ERM) through systematic and continuous practices, aligned with the Company's Key Performance Indicators (KPIs) and strategic plans.
2. Management (ERM) through systematic and continuous practices, aligned with the Company's Key Performance Indicators (KPIs) and strategic plans.
3. Encourage employees at all levels to adopt a proactive approach to risk management. This includes developing risk mitigation plans for material sustainability issues, covering Environmental, Social, and Governance (ESG) factors, climate change, and Emerging Risks, to ensure Business Continuity (BCP) and long-term sustainability.
4. Executives and supervisors at all levels are responsible for supporting activities related to risk assessment, analysis, and management of ESG-related risks, ensuring concrete compliance with the criteria set by the Stock Exchange of Thailand (SET) and external regulatory bodies.
5. Promote and develop knowledge and understanding among all employees and executives, emphasizing the importance of risk awareness and participation to foster a robust corporate risk culture.
6. Maintain an internal control system that covers all significant risks, ensuring that the Company's internal controls are appropriate, effective, and efficient.
7. Encourage employees at all levels to participate in risk management. Every employee is responsible for identifying risks that impact the Company's plans, directions, and strategies. This includes performing risk assessments based on Likelihood and Impact, proposing mitigation strategies, and executing plans to maintain risks within the Risk Appetite (acceptable levels). Risks categorized as Moderate, High, or Very High must be reported, along with their respective mitigation plans and residual risk levels, to the Risk Management Committee.
8. Upon identifying or becoming aware of risks that could potentially impact the Company, employees must report them to the Executive Management and the Risk Management Committee to determine appropriate measures for that specific situation. Alternatively, reports can be submitted via email to riskmgt@supalai.com.
9. Establish monitoring, evaluation, and reporting systems for risk management outcomes to be presented to the Risk Management Committee and the Board of Directors for acknowledgment, approval, or recommendations. This includes reviewing, updating, and reporting on emerging risks to minimize any impact on the achievement of corporate objectives.
10. Maintain a Business Continuity Plan (BCP) and a Disaster Recovery Plan (DRP) to ensure comprehensive and timely crisis preparedness, preventing any disruption to the Company's business operations.

16

Risk Management

(ต่อ)

Key Considerations:

1. Neglecting risks related to Environmental, Social, and Governance (ESG) factors, climate change, and Emerging Risks.
2. Making significant operational decisions without conducting both quantitative and qualitative assessments of Likelihood and Impact.
3. Disregarding or ignoring identified risk factors within one's own area of responsibility.

What would you do?



1. If a construction supervision engineer detects that waste management or dust control processes at a project site may impact surrounding communities more than anticipated, what actions must be taken according to company procedures?

Guidance

The employee is responsible for reporting that risk to the Executive Management and the Risk Management Committee. This is to ensure that appropriate measures are determined to mitigate risks that could adversely affect the community and the Company's reputation.

2. In the event of a natural disaster or a crisis that prevents employees from reporting to the Head Office as usual, what actions should be taken in accordance with Company policy?

Guidance

Employees must cooperate and adhere to the Business Continuity Plan (BCP) and the Disaster Recovery Plan (DRP) established by the Company. This is to ensure that their respective responsibilities can proceed without disruption, even under critical circumstances.

Self-Assessment

If there are any doubts regarding whether one's actions are correct and in compliance with the Company's Code of Conduct, directors, executives, and employees are requested to ask themselves the following questions before taking such actions:

- 1) Is this action right and fair?
- 2) Does this action take advantage of others or cause loss or damage to involved parties?
- 3) Is this action socially acceptable and can it be disclosed to the public?
- 4) Does this action damage the good reputation of the Company?

Review and Revision

The Company's Code of Conduct shall undergo a formal review at least once a year. This is to ensure that our business ethics remain aligned with corporate policies, reflect the current business environment, and strictly adhere to all applicable laws and regulatory requirements.

For inquiries or further guidance, please contact:
Internal Audit Hotline: 0 2725 8888 ext. 81201 or E-mail: pu-tham@supalai.com