



## **Supalai Public Company Limited Policy on Conflict of Interest**

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All directors, executives and employees, including employees of subsidiaries and associates shall avoid having any personal interests that will adversely affect the performance of their duties for the benefit of the Company or causing difficulties in performing their duties correctly and efficiently. Conflicts of interest may arise in a variety of situations. In performing their duties, they must adhere to the interests of the Company under the legality and ethics in accordance with the resolution of the Board of Directors' meeting.

However, all employees shall report a conflict of interest when they start working for the Company and review it once a year and every time when there is a change in circumstances that make them believe that it will cause a conflict of interest. In the event that an employee suspects a conflict of interest or something that may cause others to think that it is a conflict of interest, employees shall immediately report it to their supervisors. Supervisors and employees can jointly determine that there is a conflict of interest.

### **Practical 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.

### **Precautions**

1. Not being an owner or a partner who is involved in the business decisions of the juristic person and a group of persons engaged in similar businesses / competitors / business partners / sub-contractors working for the Company.

2. Do not work or advise companies or juristic persons/ other similar businesses/ competitors/ business partners/ sub-contractors working with the Company, except those assigned to work or advise in the Company's subsidiaries.
3. Not having family members, including father, mother, brother, sister, husband, wife, child, spouse of a child of an employee who is not engaged in similar businesses / competitors / business partners or sub-contractors / contractors /sub-contractors working for the Company.
4. Throughout the employment period or after the termination of employment with the Company, employees have never used "customer information, customer payment history, and business operation information of the Company for personal gain or for the benefit of other persons, or to cause damage to the Company.

Remarks: In the case that an employee falls under any of the following situations, the employee shall report to the Company according to the prescribed procedures.

Please be informed accordingly,

Notified on this 10<sup>th</sup> day of December 2024

*Prateep Tangmatitham*

(Dr. Prateep Tangmatitham)  
Chairman of the Board of Directors

**Copy to:** Management Committee, Supervisors of all divisions, and Human Resources Department