

# Code of Conduct

# Thai Plaspac Public Company (Limited) and the subsidiaries

Thai Plaspac Public Company (Limited) and the subsidiaries (the "Company") are committed to conducting our business in fair and ethical business practices to ensure the best interests of all shareholders or stakeholders and to realize the sustainable development of the organization. The Company has formulated a code of conduct for directors, executives, employees, and stakeholders of the Company. The Company abides by laws, policies, ethics, and business integrity standards in its behavior, to hold on to and adopt as guidelines for work appropriately.

## Definitions

- The Company refers to Thai Plaspac Public Company (Limited) and the subsidiaries.
- **Directors** refers to the directors of Thai Plaspac Public Company (Limited) and the subsidiaries.
- **Executives** refers to the executives of Thai Plaspac Public Company (Limited) and the subsidiaries.
- **Employees** refers to the employees of Thai Plaspac Public Company (Limited) and the subsidiaries.
- **Stakeholders** refers to persons or groups of persons directly or indirectly impacted by the Company's business, such as directors, employees, shareholders, contractual parties, contractors, business contacts, creditors, debtors, society at large, and communities where the Company operates.

## Laws and Regulations Practices

The Company is committed to complying with all applicable laws and regulations in the countries in which we operate, including relevant international laws and regulations, such as sanctions, export controls, reporting obligations, data protection, fair-trade competition, etc.

## **Human Rights and Labor Practices**

The Company recognizes the importance of respecting the human rights of all and has formulated policies and guidelines that do not violate human rights, and respect for human rights by directors, executives, employees, and stakeholders of the Company. The Company also considers the importance of labor. The Company treats employees in accordance with labor laws and other regulations. The guidelines related to fair and equal labor are as follows:

- 1. Treat all people based on human dignity, respect rights, obligations, and individual rights, prohibit human rights violations, and refrain from physically, sexually, mentally, verbally, harassing, or intimidating others in any form.
- 2. Treat all people with respect, dignity and treat everyone equally without discrimination due to race, age, role, sex, gender identity, color, ethnicity, religion, country of origin, sexual orientation, marital status, pregnancy, dependents, disability, social class, trade union membership or political views.
- 3. Treat individuals equally and fairly, avoiding employment discrimination, including employment, salary, progress, and discipline. Dismissal or retirement, and the recruitment of employees is not limited by gender, age, and race, as well as fair and legal employment contracts.

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- 4. Directors, executives, employees, and stakeholders of the Company have the right to freedom of association and collective bargaining are recognized and respected. Employees must not be intimidated or harassed in the exercise of their legal right to join or refrain from joining any organization.
- 5. Forced labor, human trafficking or illegal use of child labor is prohibited, including the punishment of physical and mental abuse of employees, whether through any form of physical or mental coercion, slave trade or any form of human trafficking.
- 6. Get remuneration that includes wages, overtime pay, other benefits and paid leave which meets or exceeds the legal minimum standards or appropriate industry standards, and compensation terms established by legally binding collective bargaining agreement fairly.
- 7. Not work more than the regular and overtime hours allowed by the law of the country where the employees are employed. All overtime work by employees is on a voluntary basis.

## **Employee Practices**

The Company implements the Company's rules and regulations by formulating company policies, rules, articles of association and articles of association, which are observed by directors, executives, employees, and stakeholders of the Company to ensure the orderly conduct of the Company's activities, as follows:

- 1. Perform duties with honest and transparent determination.
- 2. Avoid giving gifts to superiors or accepting gifts from subordinates.
- 3. The supervisor should respect the employee, and the employee should not do anything that disrespects the supervisor.
- 4. Maintain discipline and abide by organizational rules and good traditions, whether it is stipulated in writing or not.
- 5. Jointly create and maintain the unity and unity atmosphere of the group.
- 6. Avoid any behavior that may damage the reputation and image of the Company or cause problems for the Company in the future.

## **Occupational Safety, Health, and Working Environment**

The Company is concerned about the life and health of all personnel, Therefore, carrying out its actions in occupational safety health and working environment as follows:

- 1. Implement laws, standards, and regulations on occupational safety, health, and working environment.
- 2. Promote a healthy and safe workplace, to prevent accidents and injuries that occur during work or due to the actions of employers.
- 3. Support and promote the awareness of safety work, including supervising employees, partners, and contractors within the Company, and strictly abide by the established occupational safety and health rules and regulations.

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## **Corporate Social Responsibility**

The Company is committed to conducting sustainable growth business in accordance with the principles of protecting the environment, social responsibility, and corporate governance. By setting the following policies.

- 1. Responsible and committed to protecting the environment and local traditions of the Company's location.
- 2. Regularly carry out activities to contribute to society, community, and the environment, to improve the quality of life in the community where the Company is located by cooperation with the country and community.
- 3. Prevent accidents and control waste emissions below acceptable standards.
- 4. Quickly and effectively respond to events that affect the environment and community due to the Company operations, fully cooperate with government officials and relevant regulatory agencies.
- 7. Respect the rights and title to property and land of the individual, indigenous people, and local communities. All negotiations regarding their property or land, including the use of and transfers of it, must adhere to the principles of free, prior, and informed consent, contract transparency, and adequate and appropriate disclosure.

## **Personal Data Protection**

The Company respects the privacy rights of relevant personnel and protects the personal information of customers, directors, executives, employees, and stakeholders within the Company, must be protected and not be disclosed in a way that infringes their legal rights.

- 1. All and any personal information about individuals must be handled with full respect for the protection of their privacy and for all relevant privacy laws and regulations.
- 2. The person responsible for keeping the information owned or kept by the Company must protect the personal information of customers, directors, executives, employees, stakeholders, visitors, and contractors of the Company. Therefore, the use, disclosure, or transfer of personal information shall be carried out within the scope of their normal duties and shall not infringe upon their legal rights.

## **IT Security**

The Company values the effective use of information technology and establishes norms for the safe use of information technology to prevent information leakage and misuse, including the destruction of the resources and network.

- 1. Utilize information technology systems in compliance with all laws and regulations applicable in the country of the Company's business operations, including relevant international laws and regulations.
- 2. Use information technology systems and internal information only for the benefit of the Company.
- 3. Restrict access to internal information based on confidentiality levels, and relevant or allowed personnel.
- 4. All information related to the Company's business operations is stored in the user's computer and server system and needs to be backed up regularly to prevent loss of data.

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- 5. Remote access to the Company's network system must be properly authenticated by users and comply with the remote network connection practices.
- 6. Do not open files from unknown sources and use unsafe devices, to avoid the risk of viruses, malicious software, unauthorized software, etc. The information equipment must always monitor and update anti-virus programs, which are updated by the Company's staff.

## **Custody and Use of Corporate Assets**

The Company encourages directors, executives, employees, and stakeholders of the Company to effectively utilize corporate assets for the maximum benefit, not to lose, damage, or use for the benefit of oneself or others, as follows:

- 1. Be responsible for keeping the property of the Company, and shall not deteriorate, lose, or effectively use the property for the full benefit of the Company, and shall not use the corporate assets for the benefit of oneself or others unrelated to the business operations of the Company.
- 2. Property refers to tangible and intangible assets, such as property, real estate, technology, knowledge, patents, copyrights, Unpublished confidential information, financial estimates, and personnel information, which must avoid the disclosure or abuse of confidential information. The exception is compliance with laws related to the business operations of the Company.

## **Securities Trading and Use of Inside Information**

Use of internal information as sensitive information of the Company, directors and executives, employees, and stakeholders of the Company must take appropriate actions and must consider the overall impact on stakeholders, accuracy, and legal requirements. The information shall not be used for personal or other unrelated to the business operations of the Company, as follows:

- 1. Avoid using insider information for one's benefit in insider trading or providing internal information to others to insider trading.
- 2. Directors, executives, and employees who have access to internal information as defined by the Stock Exchange of Thailand (SET), such as the company secretary, investor relations, and chief financial officer are responsible for reporting the trading status of the Company's securities within 3 working days to prevent insider trading. And avoid making complaints about the appropriateness of insider stock trading.
- 3. Should refrain from insider trading before the release of financial statements in accordance with the regulations of the Stock Exchange of Thailand (SET) or relevant regulatory agencies, the Company status, including other important information before buying or selling Company securities, should wait at least 24 hours after disclosing the information to the public.

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## **Conflict of Interest**

The Company is committed to doing the right thing. By the practice of the directors, executives, employees, and stakeholders of the Company must adhere to the highest benefits of the Company in morality, ethics, and legal, avoid actions that could be conflicts of interest as follows:

- 1. Avoid any actions which are contrary to the interests of the Company whether caused by contact with commercial parties of the company such as business partners, customers, or competitors, or from the using opportunities or information obtained from being directors, executives, employees, or stakeholder of the Company in finding personal benefits and in terms of doing business that competes with the Company or other work aside from the work of the Company which affects the work in duties
- 2. Employees thus refrain from holding shares in the competitors of the Company. If doing or refraining from acting as a duty or having an impact on work in duties. If the stock is received before employment or before the Company goes into that business or acquired through inheritance, must report to the supervisor according to the hierarchy.

# **Anti-Corruption Policy and Related Practices**

The Company is committed to conducting anti-corruption. The Company directors, executives, employees, and stakeholders must strictly comply with the defined Anti-Corruption Policy and are prohibited from being involved with any form of corruption either directly or indirectly. By setting the following policies:

- 1. Adhere to a zero tolerance to all forms of bribery, corruption, extortion, or embezzlement, For the direct or indirect benefit of oneself, family, friends, and acquaintances, whether they are bribe takers, givers, or proposers, whether monetary or non-monetary, government or private institutions operated or associated with the Company must strictly comply with the Anti-Corruption Policy.
- 2. Do not accept or give cash, checks, bonds, stocks, gold, jewelry, real estate, or other items, nor give them to relevant personnel who have contacted them in the government sector and private institutions.
- 3. Do not accept any property, articles, gifts, or other benefits to induce them to evade their duties. Before accepting gifts, ensure that you abide by Company laws and regulations. Articles or gifts given to each other in performing their duties should not have high value and appropriate value on every occasion.
- 4. Any property, articles, gifts, or any other benefits shall not be used to induce decision-making or otherwise influence the recipient not to follow the same business practices as other counterparties. The value of gifts provided according to the opportunity shall not have a high value or exceed the normal range.
- 5. Do not provide money, property, articles, or other benefits to people related to government, any agency or organization in exchange for personal privileges that should not be enjoyed, or cause public officials to avoid performing their duties, regulations, and legal practices.
- 6. The procurement process must be carried out through the procedures of the Company's rules and regulations, and it must be transparent and verifiable.
- 7. Business entertainment expenses and other expenses related to the performance of commercial contracts can be carried out, but reasonable and verifiable expenses.

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- 8. Donation and Sponsorships must be complied with:
  - 8.1. Donating money or property to charity can only be done in the name of the Company. Donations to charities must be foundations, public charitable organizations, temples, hospitals, medical institutions, or organizations. For the benefit of society, those with certificates or credibility can be reviewed and comply with the Company regulations.
  - 8.2. Charity donations can be made in the name of an individual but must not involve or raise suspicion or fraudulent behavior committed for any benefit.
- 9. The use of Company funds or assets to support projects must be listed only in the name of the Company. The donations paid must have the Company purpose, the Company image, and the Company reputation. The appropriation must state a clear purpose and be accompanied by verifiable evidence.
- 10. Do not engage in any activities related to the internal politics of the Company, nor use any resources of the Company for such activities. The Company is a politically neutral organization that supports compliance with the law and democracy. There are no guidelines for providing political assistance directly or indirectly to any political party.
- 11. Corruption or fraud that is directly or indirectly related to the Company shall not be ignored and must report to the supervisor immediately, or through the Company notification channel according to the whistleblowing policy.
- 12. Directors and managers must realize the importance of spreading knowledge and provide consulting to improve their subordinates understanding of corruption prevention, so that employees can abide by the policy of corruption prevention, including setting a role model in honesty, ethics, and conduct.

## **Customer Relations and Product Quality**

The Company emphasizes customers and product quality. By setting the following policies.

- 1. Store and deliver products and services to meet the specifications and quality and safety criteria specified in the relevant contract or product documents to ensure they are safe for their intended use.
- 2. Provide accurate, sufficient, and timely information about products and services to customers. So that customers have enough information to make decisions. Without exaggerating the truth, both in advertising or in other channel communication with customers, which causes customers to misunderstand about the quality, quantity, or any conditions. of products or services.
- 3. Always safeguard confidential information, know-how and intellectual property. All information provided through our relationships that is not in the public domain is deemed confidential and is only to be used for its intended and designated purpose.
- 4. Respond to customer needs quickly and provide systems and channels for customers to complain about the quality of products and services efficiently.



### **Suppliers/Creditors Practices**

The Company has adhered to the practice of partners and creditors fairly, and honestly, and has not taken advantage of the partners. Which will comply with fair contracts to partners by avoiding causing conflicts of interest and there are various problems. Based on business relationships as follows:

- 1. Treat trading partners and creditors equally and fairly and based on receiving fair returns both parties comply with contracts or conditions that were strictly agreed upon in case of being unable to practice. According to one of the conditions must immediately notify suppliers and/or creditors in advance to jointly consider finding solutions.
- 2. In business negotiations should refrain from calling or paying any benefits. That is dishonest in trade with suppliers and/or creditors. If there is information that any benefits have been requested, received, or paid where dishonesty occurs. Therefore, revealing details to supplier and/or creditors then work together to solve problems fairly and quickly.
- 3. Regularly report accurate, complete, and timely financial information to creditors.

## **Competitors practices**

The Company is committed to conducting business fairly. By considering the ethics of business in accordance with trade laws in various countries that the Company operates both to customers and trade competitors

- 1. Behave under the framework of the competition fairly, transparently, and not taking advantage.
- 2. Do not seek the secret information of commercial competitors with dishonest methods. Or inappropriate, such as paying employees for competitors, etc.
- 3. Information received through legitimate methods and for legal objectives only by complying with all relevant laws and regulations. Do not try to disclose information about competitors that are delicate in commercial or secret. And not public treasure at any time
- 4. Do not destroy the reputation of competitors with a bad allegation. Creating false news or competitors
- 5. Do not agree with competitors or any person in a way to reduce or limit trade competition.
- 6. In contacting competitors, the Company personnel must not disclose or neglect the secrets of the Company in the hands of the competition.

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