

# Code of Conduct

Mc Group Public Company Limited

Announced on 10th November 2017

## Message from the CEO

Mc Group Public Company Limited “Company” has a strong intention to conduct business with fairness, responsibility, transparency and honesty to the society to be able achieve optimal business efficiency and create values to all stakeholders.

Under our aspiration to be a good governance organization conducting business with transparency and compliance with laws, the Company officially revised its Code of Conduct in writing for its directors, executives and employees to have thorough understandings and comply with the laws in performing their duties as well as refrain from any activity that are prone to conflict of interest. The Company highly anticipates that this will help gain trusts among investors and other stakeholders as our employees perform their duties under certain sets of qualities, cultures, images and standards in order to drive the Company towards excellence.



( Sunee Seripanu)

CEO

10th November 2017

## CONTENT

1. Definitions	3
2. Business Conduct	4
2.1 Business Conduct	
2.2 Anti-Corruption Policy	
2.3 Measures on offering or acceptance of financial support, gifts, rewards, reception, and donation for charity or public interest	
2.4 Exercise of Political Rights	
3. Code of Conduct	6
3.1 Compliance with laws and rules and regulations	
3.2 Conflict of Interest and Confidentiality	
3.3 Responsibilities to Company Assets	
4. Code of Conduct toward Stakeholders	10
4.1 Code of conduct related to social responsibilities	
4.2 Code of Conduct toward Shareholders	
4.3 Code of Conduct toward Employees	
4.4 Code of Conduct toward Customers	
4.5 Code of Conduct toward Trade Partners and/or Creditors	
4.6 Code of Conduct toward Competitors	
4.7 Safety, Hygiene and Environment	
4.8 Policy on Responsibilities to Community and Society	
5. Code of Conduct for Employees	16
5.1 Self Treatment	
5.2 Code of Conduct for Customers	
5.3 Code of Conduct between employees	
5.4 Code of Conduct for the Organisation	
5.5 The Exercise of Political Rights	
6. Compliance and Review of the Code of Conduct	18
7. Complaints and Suggestions	18
7.1 Channels for Complaints and Suggestions	
7.2 Complaint Handling/Investigation Procedures	
7.3 Protection of Whistleblowers	
8. Discipline	19

1. Definitions
----------------

Code of Conduct	Moral principles in conducting fair and righteous business of Mc Group Public Company Limited in order to sustain the Company's reputation and honor
Group of companies under Mc Group "The Company"	Mc Group Public Company Limited, associated companies and subsidiaries or other companies that Mc Group has controlling power including business representatives
Director	Directors serving in the Board of Directors and/or other committees and sub-committees
Executive	Chief Executive Officer and Managing Director/Deputy Managing Directors/Assistant Managing Directors/ Senior Directors/ Directors/Assistant Director/ Managers
Employee	Full-time, temporary or special contract employees from assistant manager level or equivalent and below
Asset	Company assets including movable and immovable assets, technology, copyrights, patents, documents of titles and inventions of the Company.
Company Information	Information with economic values in the present and the future that is owned or controlled by the Company.
Stakeholder	A person or a legal entity that has an investment, share, or interest in the business of the Company ie shareholders, executives, employees, trading partners, competitors, customers, creditors as well as communities and the society
Conflict of Interest	A situation or action in which personal benefits of a person in a position or related parties influence, affect or impede the best interest of the Company
Transparency	Public disclosure of actions/processes and rationales behind decision making under applicable laws, rules and regulations.
Honesty	Work conducts that conform to the Company's rules and regulations.
Responsibility	Awareness of one's duties and performance of those duties with the best efforts.
Accountability	Liability of one's actions for both positive and negative outcomes.

## 2. Business Conduct

### 2.1 Business Conduct

Vision: Mc Group Public Company Limited aspires to be a leading apparel and lifestyle business in Asia with various brands under management serving different lifestyles. We are committed to maximising our stakeholder and customer satisfaction by offering best fit quality products and passionate services with reasonable prices for all customers through convenient channels.

#### Core Values

M : Motivation - Motivated to create best outputs for the customers

C : Commitment - Committed to promises made to the customers and partners under honest business conducts.

W : Willingness – Conduct business in all functions with strong will to deliver the best products and services

A : Appreciation - Appreciate and respect others as well as their works and be kind to each other both in the same department and organization wide.

Y : Yes-minded - Positively handle all kinds of issues and be ready to tackle the problems under any circumstance and believe that there is a solution for every problem.

The Company stipulates principles for good governance in business conduct to create sustainability for the organization as follow

1. Strictly comply with laws, rules and related regulations
2. Conform to “Corporate Governance Policy” and “Code of Conduct” of the Company
3. Committed to conducting business with transparency, honesty and fairness
4. Have a strong intention to behave as a good citizen with good morals.
5. Concern for interests and other effects from the Company’s business conduct under fairness and equality to all stakeholders.
6. Conduct business with accountability and act in the best interests of the stakeholders and the society
7. Create sufficient monitoring systems to prevent corruptions and enforce effective internal control systems.
8. Ensure that directors, executives and employees follow Anti-corruption Policy, report any conflict of interest, communicate effectively and promote quality of life in the workplace.
9. Provide channels for stakeholders to send complaints/opinions or recommendations as well as put in place measures to protect the complainers and whistle-blowers.

## 2.2 Anti-Corruption Policy

The Company is committed to conducting business with honesty and fairness and being responsible to the society and our stakeholders as well as strictly conform to Corporate Governance Policy and the Code of Conduct.

To ensure that the directors, executives and employees of companies under Mc Group shall perform their duties with honesty and transparency, the Company stipulated the Anti-Corruption Policy as follows:

“Directors, executives, employees of the Company are prohibited to undertake, support or accept any kind of corruption, both directly or indirectly for the their personal benefits or the benefits of their families, friends or related parties neither as a recipient, an offerer or a briber for both financial and non-financial benefits, covering every business and related department in every country. The Anti-corruption Policy has to be reviewed regularly, including with a possible revision of such policy and implementation provision in order to accord with business changes, regulations, standards, and laws. If there is any violating or supporting action to any kind of corruption, the person must be subject to disciplinary actions as stipulated by the Company and legal actions will also be taken in case of illegal activities.

In order to promote anti-corruption practices, the Company has set out guidelines and conducts in “Anti-corruption Policy” where directors, executives and employees must strictly comply with”

## 2.3 Measures on offering or acceptance of financial support, gifts, rewards, reception, and donation for charity or public interest.

Offering and accepting any support including money, asset or reception to or from business contacts must be in accordance with local traditions as well as related laws with appropriate values and must not incentivize unfair decisions or be considered as bribery.

The Company announced the measures on offering or acceptance of financial support, gifts, rewards, reception, and donation for charity or public interest as a standard guideline for employees to follow as outlined below.

- (1) Executives and employees must not offer, solicit or accept gifts such as reception, services, financial support or financial rewards to and from trade partners and creditors who conduct business with the Company.
- (2) Do not accept gifts or other benefits from business contacts except under certain occasions or festivals that are social norms that general public observes. The gift or benefit must be subject to the maximum limit of 3,000 baht. In case that the value exceeds the limit, ones must report the supervisor in writing and present that benefit or gift to the Company. The action must not influence any decision making that can be unfair and must be reviewed and granted permission according to approval authority procedures of the Company.

- (3) In case that directors, executives or employees represent the Company at a business partner's event or participate in an external training/seminar and receive a benefit or gift worth more than 3,000 baht from lucky draw, lotto or as a souvenir, they must report the supervisor in writing and present that benefit or gift to the Company.
- (4) Offering and acceptance of gifts or other benefits that does not comply with (2) and (3) where it is necessary to maintain good relationships with other people or organizations must be notified to the supervisors and the benefit must be presented to the Company through Human Capital Department within five (5) days after the gift or benefit is received in order to be recorded in the gift registrar and take further actions.

#### 2.4 Exercise of Political Rights

The Company conducts its business with political neutrality and does not support or help any political party or specific political authority. The Company shall not use its funds, resources or any other asset to support, directly or indirectly to a politician, a political party or any political authority for the benefits of those people.

Nevertheless, directors, executives and employees are encouraged to exercise their rights in participating in political activities under the provisions in the constitution, laws or related rules and regulations. However, they are prohibited from any activity that may lead to an understanding that the Company is related to or support a politician, a political party or any political authority.

### 3. Code of Conduct

The Company requires that directors in Board of Directors and subcommittees and directors of its associated companies and subsidiaries and other companies that the Company has controlling power including business representatives perform their duties with honesty and prudence and conform to the Code of Conduct for the best interests of the Company to ensure the business continuity and sustainability. The Code of Conduct is outlined below.

#### 3.1 Compliance with laws and rules and regulations

3.1.1 Comply with laws, rules, regulations and other mandates related to business operations as follow

- 1) Directors, executives and employees must comply with applicable laws, rules and regulations stipulated by the Stock Exchange of Thailand, the Security and Exchange Commission and other related agencies.
- 2) Directors, executives and employees must comply with the Company's Corporate Governance Policy, Code of Conduct and other applicable policies.

3.1.2 Perform their duties with unbiasedness and in case of conflict of interest, interested director shall not participate in the meeting or recuse from the deliberation.

3.1.3 Avoid any conflict of interest to ensure transparency and efficient management.

- 1) Do not use Company's information to wrongfully seek personal benefits for yourself or related others
- 2) Do not wrongfully use or disclose the organization's secrets during and after your service to the Company.
- 3) Do not seek personal benefits from directorship
- 4) Do not make commitments that later can contradict to your duties
- 5) Do not accept any gift or benefit that is against the best interests of the Company.

3.1.4 Protect organization's secrets and related information from unrelated parties where damages can be caused to the organization or stakeholders unless it is required by laws.

3.1.5 Any acquisition or sales of listed securities of directors, their spouses and minor children must comply with the acts announced by the Securities and Exchange Commission under the Acquisition and Sales of Assets of Directors and Employees Act 2004.

## 3.2 Conflict of Interest and Confidentiality

### 3.2.1 Conflict of Interest

- (1) To ensure a sufficient monitoring on conflict of interest of the Company and its subsidiaries from directors, executives and related persons according to the Securities Acts, the Company requires quarterly reporting of all related transactions in compliance with the applicable rules and regulations.
- (2) In case that related persons hold shares or involve in a business directly competing with the Company where conflict of interest may arise, these actions must be taken
  - Directors, executives and related persons must notify the Board of Directors in writing.
  - Employees must notify their supervisors in writing and the supervisors must report to the Corporate Secretary.

### 3.2.2 Confidentiality and Use of Inside Information

The Company put in place policies on confidentiality and inside information protection as guidelines for directors, executives and employees to strictly observe to keepsake and protect confidential information of the Company especially inside information that is not disclosed to public or information that can affect business undertaking or stock's prices. The guidelines are as follow



- (1) Do not use inside information or take advantage of one's position as a director, an executive or an employee to seek personal benefits or benefits of others or conduct business that competes with the Company and its related businesses.
- (2) Do not use inside information for the purpose of trading of Company's shares for personal benefits or give inside information to others for the same purpose.
- (3) Do not use the Company's asset for personal benefits or the benefits of other related parties.
- (4) Do not refer the Company's information to other external parties for personal benefits or the benefits of related others.
- (5) Do not disclose Company's business secrets to external parties especially competitors even after the service ends as a director, an executive or an employee.
- (6) Directors, executives and employees who have access to inside information must file their acquisition report regularly to the Board of Directors as mandated by the Securities and Exchange Committee.
- (7) Directors and executives must report the Company promptly through the Company Secretary after the transaction of buying and selling securities is undertaken and submit the copy of the report to the Company the same day as sent to SEC. The Company Secretary shall report the transactions to the meeting of the Board of Directors quarterly.
- (8) Directors, executives and employees who have or have access to inside information that could significantly affect the share price of the Company must refrain from any trading activity one ( 1 ) month prior to the Company's announcement of its performance or the disclosure of the information and 24 hours after the time that information is publicly released. Persons related to that information must not disclose the information to others before reporting to SET. Disciplinary actions will be taken in case of violation as the Company considers this as a breach to the Company's work rules and regulations.
- (9) Directors, executives and employees must strictly conform to policies related to the use of inside information.

### 3.3 Responsibilities to Company Assets

The Company encourages its executives and employees to use its resources and assets efficiently in order to enhance its competitive advantages and service quality to the customers by issuing the following guideline for its executives and employees

1. Use assets and resources of the Company economically and to its optimal benefits.
2. Protect assets of the Company from loss and damages

Documentation and Use of Computer and Information and Communication Technology System

- (1) Executives and employees must prepare and manage documents with honesty and prudence under specified standards.
- (2) Do not involve in any falsification or forgery of accounts, reports or other documents of the Company.
- (3) Computer appliances, information and communication technology systems and information are properties of the Company. Executives and employees shall not use them for personal purposes.
- (4) Executives and employees are prohibited from disclosing business information including acquired information both inside or outside the Company's database system or duplicating that information to any recording devices without permission.
- (5) Executives and employees shall not change, duplicate, delete or destroy Company's information without permission.
- (6) Executives and employees shall not use illegal softwares and duplicate copyrighted softwares in any case without the permission from the software companies that own copyrights.
- (7) Executives and employees shall not refigure hardware appliances or install any equipment apart from standard ones that the Company installs without granted permission on case by case basis.
- (8) Executives and employees shall not use Company's emails to send messages that are slandering, sabotaging, impolite, vulgar, threatening, instigating or annoying to others.
- (9) Executives and employees shall use internet to find useful information for their works and avoid illegal or improper websites.
- (10) Executives and employees shall use information technology and other communication devices arranged by the Company such as telephones, facsimiles, mobile phones responsibly with concerns to the interest of the Company.
- (11) Executives and employees are prohibited to access to non-authorized systems or contents or to misuse that information for personal purposes.
- (12) Executives and employees shall not use or possess access to information and computer systems of other people or intend to use it to damage them.
- (13) The Company and authorised agencies reserve the rights to examine the usage of any asset under its information systems as seen appropriate.

#### 4. Code of Conduct toward Stakeholders

##### 4.1 Code of conduct related to social responsibilities

The Company is committed to conducting business with honesty, fairness, transparency and complete compliance to anti-corruption policies, applicable laws, rules and regulations as well as concerns of interests and effects from its business conduct to all stakeholders. In addition, the Company ensures that proper Safety, Hygiene and Environment management is in place to protect all the stakeholders to grow strongly alongside with communities and the society.

##### 4.2 Code of Conduct toward Shareholders

The Company realizes that shareholders are the owners of the business and thrives to create added values to the shareholders in the long term. Therefore, the Company has set out the following guidelines for its directors, executives and employees to conform to.

1. Carry out their duties with responsibility, prudence, honesty under rational decision-making based on adequate and accurate information without any direct or indirect conflict of interest for the best interests of the Company. Do not conduct or involve in any action that may lead to conflict of interest.
2. Comply with laws, objectives, rules and regulations, resolutions from the committees and shareholder meetings. Strictly follow the guidelines and practices under Corporate Governance Policy and Code of Conduct and treat majority and minority shareholders equally for the best interests of the shareholders.
3. Manage and protect the Company's assets from depreciation and loss. Put in place adequate and effective internal control and risk management system.
4. Encourage shareholders to participate in governance and give opinions regarding fair treatment conducts.
5. Report Company's statuses regularly and completely based on up-to-date facts.
6. Distribute adequate factual data, news and other information of the Company at the right times to all the shareholders equally for their decision-making.
7. Prevent directors, executives and employees from seeking benefits for themselves or related parties by taking advantage of any information not yet disclosed to public or disclosing Company's secrets to external parties or taking any actions with potential conflict of interest.

8. Establish extensive channels for whistleblowers and complainants to file complaints and notify responsible parties of any wrongdoing covering websites, postal mails and telephones and design proper response procedures to systematically notify complainants as well as protection measures for whistleblowers.
9. Provide various channels for information dissemination including Company's website that shareholders can access with convenience in easy formats and languages in both Thai and English.

#### 4.3 Code of Conduct toward Employees

1. The Company has in place the protection measures for employees who report the authority for illegal activities or actions that do not comply with the Securities and Exchange Commission Acts. The Company must not undertake any unfair treatment such as changes in position, function or workplace including suspension, layoff or any kind of threat and intervention (Section 89/2) to whistleblowers who inform the authority of any illegal or unethical action.
2. The Company respects and strictly conforms to laws and principles relating to human rights by setting a code of conduct to ensure that its employees work and treat one another equally and fairly with respect to personal rights and without discrimination by race, religion, gender and social or political status, to be in compliance with standard practices relating to human rights. The Company has determined not to support or promote any businesses that violate human rights. The Company also respects individual privacy of their employees and personal information such as salary, medical history or family data information disclosure is required by law.
3. The Company has put in place policies and management of compensation and benefits which are better than required by laws and to emphasize the appropriateness and consistency with the Company's performance, individual performance of each employee as well as those of other companies in the same or related industry. The compensation and benefits must be competitive, fair, flexible and efficiently managed.
4. The Company realizes that employees are a key factor in creating quality products for the Company. Therefore, the Company put importance on fair treatment to the employees under equality and equitability in terms of hiring, compensations and benefits, appointments, relocations as well as capability and moral development in order to foster employees to become competent and good citizens of the society. The Company has set out the following code of conduct.
  - (1) Strictly comply with labor laws as well as rules and regulations related to employees.

- (2) Treat employees with politeness and respect individuality and human dignity under universal human right practices.
- (3) Arrange fair employment conditions for the employees and compensate them properly based on their competency.
- (4) Promote safe and hygienic work environment and work system for the safety of life and property of the employees including their health.
- (5) Emphaize on employee development in order to enhance their skills and competencies as well as promote comprehensive and regular learning.
- (6) Appoint, relocate, reward and punish employees with sincerity based on their knowledge, ability and suitability.
- (7) Provide provident funds for employees according to the Company's policies.
- (8) Disseminate information and news related to the Company's performance and status to the employees on a regular basis.
- (9) Open to opinions and recommendations that employees may have based on their professional grounds.
- (10) Avoid any unfair action that can affect employees' job security and refrain from threatening or mentally pressuring employees.
- (11) Foster the concepts of giver and good citizenship to the employees
- (12) Establish complaint channels for employees so that they can file complaints or inform authorities of any wrongdoing including response procedures and protection measures for complainers or whistleblowers.
- (13) Promote employee's participation in suggesting work practices and/or agreements that benefit all parties including building good relationship and harmony at work under mutual organization cultures.
- (14) Encourage employees to participate in internal and external activities that benefit the organization and the society in order to enhance organization participation and engagement as seen appropriate by supervisors' discretion.

#### 4.4 Code of Conduct toward Customers

The Company thrives to create values and grow together with its customers and views customer's trust as a key catalyst to business success. As a result we treat customers with sincerity and

politeness with a strong intention to find ways to better serve the needs of them. Bearing that in mind, the Company has issued the related Code of Conduct below

1. Design, produce and deliver quality and standard products as agreed with customers under reasonable prices without taking excess profits.
2. Adequately provide accurate information, news and suggestions on a timely basis to the customers regarding the products and services.
3. Strictly conform to terms and conditions as agreed with customers. Notify customers in case any condition cannot be fulfilled to find out mutual solutions for the case.
4. Treat customers with politeness and gain trust among them.
5. Establish a secure customer database and customer confidentiality measures. Do not send customer data without their permission and do not misuse customer data for personal benefits or the benefits of related others.
6. Offer warranty for products under proper time condition and comply with Consumer Protection Act
7. Ensure that systems/ processes that allow customers to complain on product qualities, quantities, safety and other services are in place including response system to guarantee timely responses and complete actions.
8. Initiate and support Corporate Social Responsibility programs of customers.
9. Commit to develop environmental-friendly production, packaging and logistics of the products.
10. Create channels to consistently disseminate related information about products and product development.

#### 4.5 Code of Conduct toward Trade Partners and/or Creditors

The Company has set out the Code of Conduct for its trade partners and creditors stressing on equality and fairness with the concerns on the best interests of the Company. The Code of Conduct is based on fairness for both parties and emphasizes on avoiding potential conflict of interest and fulfilling its obligations to the partners including providing accurate information and reports. Detailed guideline is as follows

1. Be open for business opportunities with partners and conduct vender/partner selection based on equality and fairness.

2. Only use products and services with copyrights, patents and trademarks. Do not support pirated products or actions that violate intellectual property rights.
3. Do not offer or accept financial or non-financial benefits or other inducements from business contacts where it can be perceived as a case of preferential treatment that can cause damages to the Company. Conform to the measures on offering or acceptance of financial support, gifts, rewards, reception, and donation for charity or other public interests.
4. Offering of gifts or other inducements: Executives and employees are prohibited from offering inducements or any incentive to external parties that can lead to wrongful actions or conflicts and must conform to the measures on offering or acceptance of financial support, gifts, rewards, reception, and donation for charity or other public interests.
5. In case of any lead to fraudulent solicitation, acceptance or payment, all details must be disclosed to the partners to mutually find solutions to the issue with fairness and speed. Protective measures and fair selection process based on qualification must also be established.
6. Strictly comply with terms and conditions agreed with partners and/or creditors.
7. Notify partners/creditors in advance in case of any breach of terms and conditions in order to mutually consider corrective measures.
8. Consider doing business with trade partners who conduct business in accordance with laws, Safety, Hygiene and Environment practices and social responsibility.

#### 4.6 Code of Conduct toward Competitors

The Company has set out Code of Conduct toward competitors based on fair competition under international frameworks, laws and practices related to trade competition practices against monopoly and the misuse of market power including offering and acceptance of bribes or other benefits and distortion of competitive market mechanism. Illegal acquisition of confidential information of the competitors and defamation of competitor's reputation are prohibited. The Company shall conduct business under fair competition, promote free trades and refrain from market dumping.

1. Conduct business under fair competition, promote free trades and refrain from market dumping.
2. Do not wrongfully or improperly seek confidential information or trade secrets of the competitors such as bribing or hiring competitor's employees to acquire confidential information.
3. Do not destroy competitor's reputation through vilification or defamation
4. Do not support or collaborate in unfair biddings.

5. Do not violate and strictly comply with intellectual property laws.

#### 4.7 Safety, Hygiene and Environment

The Company is committed to operating its business under proper safety hygiene and environment management and has stipulated the following code of conduct to ensure sufficient procedures are in place to promote hospitality at work for employees including other environmental-friendly conducts as indicated below

1. Comply with applicable laws, rules and regulations related to Safety, Hygiene and Environment.
2. Encourage the employees to efficiently and economically use resources. Establish energy saving measures and promote reuse/recycling practices in all business processes.
3. Set out work processes that promote safety and hygiene in the workplace including pollution control system. Provide clean and hygienic workplace to protect employees and visitors from dangers and illnesses.
4. Ensure that executives and employees must pay attention to Safety, Hygiene and Environment activities and be fully-aware of safety and environment practices.

Constantly disclose and communicate information on activities related to Safety, Hygiene and Environment that the Company organises to all employees and related parties.

#### 4.8 Policy on Responsibilities to Community and Society

With its goal to grow happily alongside with communities and the society, the Company takes part in strengthening communities to be able to support themselves through numbers of social activities. The Company's policies are in line with government's development direction to sustainably develop quality of life and local economy. Bearing that in mind, the Company has stipulated the following code of conduct

1. The Company must conduct its business stressing on the interest and sustainability of community and society.
2. The Company must ensure adequate planning and preventive/control measures for any activity that has potential impacts on the environment and communities.
3. Organize social activities and encourage participation from all employees to promote good citizenship and volunteer spirit of the employees.
4. Support and preserve religions, cultures, traditions and customs of the local communities.
5. Generate revenue and support the economy of local community by finding and promoting activities that enhance knowledge and skills of the people in the community in order that they can use the knowledge to earn additional income to build and support their families and communities and be able to rely on themselves.



6. Communicate with communities and the society with consistency and transparency and report results from social responsibility activities to all stakeholders.

## 5. Code of Conduct for Employees

The Company intends to develop employees' competencies as well as promote good citizenship in order that its employees will be both "competent and morally good" which will benefit the society and the stakeholders. Code of conduct for the employees are below.

### 5.1 Self Treatment

1. Respect and strictly comply with laws and rules and regulations of the Company
2. Perform duties with prudence, honesty, carefulness, fairness, unbiasedness and do not seek personal benefits from the positions.
3. Be responsible and hold accountable for actions to gain trust and acceptance from the society
4. Carry out assignments at your full capacity and knowledge.
5. Be moral and ethical as well as continuously seek new knowledge and develop skills to effectively perform assigned duties.

### 5.2 Code of Conduct for Customers

1. Learn and understand customer's needs thoroughly before offering any product and service to the customers in order to best serve their needs.
2. Do not disclose customer information without permission
3. Treat customers with politeness and respect as well as use polite words in communicating with the customers.
4. Have a positive attitude towards customer services. Put customers first and put best efforts at work to ensure valuable and effective services in order to attain service excellence.
5. Respect customer's decisions and opinions and must not violate their privacy rights for the Company's interests.
6. Strictly conform to Code of Conduct for customers and other related policies.

### 5.3 Code of Conduct between employees

1. Be kind to colleagues and assist their tasks as appropriate.
2. Express one's opinions politely and properly.
3. Do not provoke, accuse or mock others where the actions will lead to discord and avoid plagiarism.

4. Do not act in the way that sexually harasses colleagues. In case of such incidents, immediately report the supervisors.
5. Have disciplines and must not engage in any activity that disrespect the superiors. Colleagues and subordinates must be treated with politeness, kindness and good rapport.
6. Do not persuade or lead colleagues in any decision-making regarding their political rights.

#### 5.4 Code of Conduct for the Organisation

1. Perform duties at one's full capacity and be responsible and accountable for one's actions.
2. Do not violate, avoid, disobey or ignore rules and regulations including mandates and policies of the Company as well as lawful orders from supervisors.
3. Do not engage in businesses/activities that can be perceived as a business/activity with potential conflict of interest with the Company either directly or indirectly.
4. Document and classify data in accordance with regulations of the Company
5. Do not disclose Company's information to others without the rights according to regulations or business agreements except that written permission is given from authorised persons or responsible agencies.
6. Do not use Company's information for the purpose of security trading or send that information to others for the same purpose.
7. Do not produce or possess illegal items for personal use, sales or for others.
8. Use communication and computer systems responsibly. Do not sabotage, threaten, create disharmony or promote hostility in the workplace.
9. Do not use communication and computer systems for illegal purposes or any activity violating the Company's policies. Do not use internet or related services in the way that can destroy Company's reputation and credibility.
10. Comply with safety measures related to the use of equipments and work environment.
11. Do not use, sell, lend or transfer the Company's assets without permission no matter the condition of that asset is.
12. Do not intentionally damage, sabotage or destroy Company's assets.
13. Do not use Company's assets for personal benefits or for other external business unless the permission from the supervisors.
14. Put efforts in acquiring patents and copyrights and protect trademarks which are intellectual properties of the Company.
15. Do not intentionally file or present false or erroneous reports or records or hide any information and must notify the supervisors immediately when those reports or records are found.

16. Spend work time efficiently and effectively as stipulated in rules and regulations and do not persuade colleagues or subordinates to engage in other activities not related to the interests of the Company and shareholders.
17. In case of misconduct, wrongdoing, corruption and other situations that can cause damage to the organization, inform the authority immediately through provided complaints and suggestions channels. (Section 7, Complaints and Suggestions)

## 5.5 The Exercise of Political Rights

The Company conducts the business with political neutrality and do not participate in or favour any political party or specific political authority. The Company shall not use its funds and resources to support, directly or indirectly to a political party or a politician. Nevertheless, directors, executives and employees have their rights to participate in political activities under the provisions in the constitution, laws or related rules and regulations.

## 6. Compliance and Review of the Code of Conduct

The Company required its directors, executives and employees to acknowledge, understand and strictly comply with this Code of Conduct not just voluntarily and must be aware of the Code at all times.

Executives at all levels must be responsible in ensuring that all the subordinates understand and comply with the Code of Conduct and other guidelines.

The Company has no intention to allow any wrongdoing or action that is illegal or unethical. In case of violation to the Code, disciplinary and/or legal actions will be taken against that director, executive or employee.

The Board of Directors mandated that "Code of Conduct" Manual must be reviewed annually.

## 7. Complaints and Suggestions

### 7.1 Channels for Complaints and Suggestions

The Company offers various channels for employees and stakeholders to send their complaints and opinions as well as report illegal activities such as corruptions, misconducts, or any other situation that can cause damages to the organization. The Company has proper conducts for complaint handling to investigate and find out the facts to uphold justice as well as protect the complainers/whistleblowers per following

### 7.2 Complaint Handling/Investigation Procedures

The Company offers channels for employees to file their complaints and freely express their opinions to promote development and sustainability of the organization as follow

- 7.2.1 The Complain handler gathers all facts related to the violation or incompliance of the Code of Conduct
- 7.2.2 The Complain handler reports the facts to the independent directors and conducts investigations and fact findings on the complaint. Related matters will be classified into different issues such as management, knowledge development and fact finding.
- 7.2.3 The complaint handler reports the independent directors to investigate and stipulate measures in order to withhold the violation or incompliance.
- 7.2.4 Result reporting: the complaint handler is responsible for notifying the complainer of the results in case that the complainer discloses his/her identity. For important cases, the complaint handler must report the Chairman of the Board of Directors and/or the Board of Directors.

### 7.3 Protection of Whistleblowers

The Company stipulated the following measures to protect whistleblowers

- 7.3.1 Whistleblowers are entitled to anonymity in case that disclosure of identity can cause damages to themselves.
- 7.3.2 Related parties/ persons who receive the complaint must keep the information confidential and concern of the safety of the employee who are the whistleblower or the information source including related persons who cooperate in investigation process by setting out clear protection measures. The measures will protect the whistleblowers from unfair treatments such as demotion, reassignment, relocation, suspension, threat, intervention or termination of employment that is a result of the whistleblowing.

## 8. Discipline

The Company regards the stipulated Code of Conduct s as a discipline that all directors, executives and employees must strictly comply with. Any violation to this Code of Conduct is a disciplinary offence according to Human Resource Management's practices.

All directors, executives and employees must comply with and encourage others to follow the Code of Conduct. The following actions are considered to be a breach of discipline.

1. Violate the Code of Conduct
2. Lead, encourage or support others to violate the Code of Conduct
3. Ignore or neglect when any violation or non-compliance is witnessed.
4. Not cooperate or obstruct or investigations/examination
5. Treat complainers of violations of the Code report unfairly