



**Srithai Superware Public Company
Limited**

Business Code of Conduct

(Revised Version 3, B.E. 2568 / 2025)

Preface

Srithai Superware Public Company Limited (“the Company”), as one of Thailand’s leading manufacturers and distributors of plastic and melamine products, recognizes and is committed to promoting the Company as an efficient organization—both in business operations and in good corporate governance—operating with ethics, transparency, and accountability. This is to deserve the trust of shareholders and investors, while ensuring fairness to all stakeholders, in order to build confidence and achieve stable long-term growth.

Therefore, in alignment with the Company’s good corporate governance policy, the Business Code of Conduct has been revised to the 3rd edition (B.E. 2568 / 2025). This Code is to be strictly adhered to by directors, executives, and employees. It has been developed and updated to reflect economic and social changes as well as principles of good governance. The Company believes that this will further enhance the efficiency, transparency, and sustainability of its business operations.

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Business Ethics

Introduction

Srithai Superware Public Company Limited is committed to conducting business in a manner that promotes efficiency, sustainable growth, and profitability. The Company emphasizes good corporate governance to achieve effectiveness, transparency, and fairness, thereby gaining the trust of investors and strictly respecting the rights and responsibilities toward all stakeholders.

The Business Ethics serves as a key tool for promoting transparency and building trust with investors and all related parties. The Company has therefore established this Code of Business Ethics as a guideline for directors, executives, employees, and all stakeholders to follow. It aims to reinforce good corporate governance principles based on integrity, fairness, responsibility, and transparency.

Code of Conduct

Section 1: Treatment of Stakeholders

1. Responsibilities to Shareholders

Principle:

The Company respects the ownership rights of all shareholders—both management and non-management shareholders, including foreign shareholders. It is committed to protecting the interests and rights of all shareholders fairly and equitably, regardless of their shareholding size. The Company ensures full, accurate, and transparent disclosure of key information, including shareholder entitlements or matters that may affect the Company. The Company also facilitates the exercise of shareholder rights and acts diligently to prevent any damage to shareholders, thus enhancing satisfaction and confidence in investing in the Company, which ultimately benefits both the shareholders and the organization.

Policy and Practice for Shareholder Treatment

Definition:

A shareholder refers to a legal owner of a business entity, such as a limited partnership, private limited company, or public limited company. Shareholders are considered the most important stakeholders, being the ultimate beneficiaries and having the greatest influence on the business's growth and survival.

Policy:

Recognizing that shareholders are the owners of the Company, the Company ensures that directors, as shareholder representatives, along with executives and employees, uphold good corporate governance principles. The Company protects shareholders' rights, facilitates the exercise of their entitlements, and treats all shareholders equally to maximize long-term sustainable value.

Practices:

1. Manage the organization in accordance with its vision and corporate governance principles with integrity and prudence, avoiding conflicts of interest.
2. Respect shareholders' rights and treat all shareholders fairly and equally without infringing or violating their rights.

3. Allow shareholders to propose agenda items and nominate directors in advance for the Annual General Meeting within a designated period.
4. Disclose the date, time, venue, and agenda of the shareholders' meeting, along with relevant decision-making information, in a timely and sufficient manner.
5. Allocate sufficient time for the meeting and encourage shareholders to express opinions and ask questions related to the Company's operations.
6. Facilitate shareholder participation in meetings without restrictions and provide accessible channels for complaints or suggestions.
7. Prohibit directors, executives, and employees—along with their spouses and minor children—from using undisclosed internal information for personal or third-party gains.
8. Establish effective internal control, internal audit, and risk management systems.
9. Disclose essential corporate information, financial reports, and operating results accurately, completely, and promptly through various communication channels.
10. Monitor and review related party transactions and potential conflicts of interest on an ongoing basis.
11. Avoid any actions that may limit shareholders' access to corporate information.

2. Responsibilities to the Government Sector

Principle:

The Company emphasizes transparency and integrity when engaging in transactions with government agencies. It aims to avoid inappropriate actions or those conflicting with principles of good governance.

2.1 Policy and Practice Regarding Responsibilities to the Government Sector

Definition:

Responsibility to the government sector refers to the organization's obligation to consider the impact of its decisions and activities on society and government entities. This responsibility is executed transparently and ethically, supports sustainable development, aligns with stakeholder expectations, complies with laws, and adheres to international standards for effective and continuous operations.

Policy:

Recognizing the government as a key stakeholder, the Company has established guidelines for engaging with government agencies to avoid inappropriate conduct.

Practices:

1. Conduct all transactions with government officials or agencies transparently and honestly, upholding integrity and avoiding any conduct that could be deemed improper or contrary to good governance principles, including the prohibition of bribery for business advantages.
2. Fully cooperate with the government in complying with relevant laws, regulations, and rules.
3. Commit to public-benefit initiatives, whether government-mandated or company-initiated.

2.2 Policy and Practice on Facilitation Payments and Hiring of Government Officials

Definition:

Facilitation payments are small, unofficial payments made to government officials to expedite routine processes that do not require the official's discretion and are within the scope of legal entitlements, such as license issuance, certification, or public services.

Policy:

The Company prohibits all forms of facilitation payments, whether direct or indirect. It does not tolerate or engage in any activities that seek to gain business advantages through such payments.

Practice:

The Company will not make facilitation payments under any circumstances, as doing so poses a high risk of being classified as bribery. Such actions increase business costs, risk reputational damage, and violate the Company's anti-corruption policy.

2.3 Policy and Practice on Hiring Government Officials (Revolving Door)**Definition:**

Government officials refer to individuals currently or formerly serving as public officials, politicians, or consultants to government entities who later join the Company and might use relationships or inside information for the Company's benefit. This can lead to conflicts of interest or unfair business advantages.

Policy:

The Company acknowledges the risks posed by the "Revolving Door" phenomenon—government officials joining the Company or company employees entering public policymaking roles. These movements may lead to conflicts of interest and undermine impartial governance.

Practices:**2.3.1** When a government official joins the Company:

1. The Company will not hire or appoint active government officials, except where regulations explicitly allow for state enterprise representatives.
2. A cooling-off period of two years is required before appointing former government officials or individuals previously working with regulators directly overseeing the Company.
3. Conduct due diligence to check for potential conflicts of interest before appointing individuals as directors, advisors, or executives.
4. Define prohibited actions to prevent misconduct or conflicts of interest, such as disclosing government secrets, lobbying for improper benefits, or being assigned to liaise with their former agency.
5. Ensure transparency by disclosing the names and backgrounds of former government officials appointed as advisors, directors, or executives, along with the rationale for such appointments in corporate disclosures.

2.3.2 When Company personnel assume government policy roles:

1. Disclose the names, roles, and reasons for directors, advisors, executives, or employees serving in government policy-making positions in Company documents for transparency.
2. Define prohibited actions to prevent misconduct or conflicts of interest, such as revealing government agency secrets or lobbying for undue benefits.
3. If a Company executive assumes a significant policy role in the government, such as a cabinet position, the Company may request resignation from their corporate role to maintain transparency.

3. Treatment and Responsibility to Employees

3.1 Treatment of Employees

Principle:

The Company is committed to managing human resources in alignment with its policies, business objectives, and strategic goals. It aims to develop employees with knowledge, capability, and positive attitudes, providing fair compensation and benefits. The Company ensures a workplace with standardized quality, safety, occupational health, and environmental management systems. It upholds non-discrimination and respects human rights and personal freedoms of individuals or groups, both directly and indirectly. The Company also establishes channels for employees to raise grievances or report concerns that may negatively affect the organization, employees, or themselves, along with methods for addressing such grievances while protecting whistleblowers. This supports a positive work environment where employees can work safely, efficiently, and with a stable quality of life.

Related Policies and Practices

3.1.1 Policy and Practice on Occupational Health, Safety, and Working Environment

Definition:

Occupational health refers to the science and art of maintaining and promoting workers' health and safety. This includes disease prevention, health promotion, medical care, rehabilitation, and management to ensure workers can perform their duties free from illness and danger, in a state of physical and mental well-being, and with optimum productivity.

Policy:

The Company places importance on quality, safety, occupational health, environmental management, and social responsibility in line with sustainable development. Executives and employees at all levels are responsible for effective implementation of this policy, ensuring it aligns with the Company's operations.

Practices:

The Company strives to grow sustainably while balancing care for society, communities, and the environment (ESG – Environment, Social, and Governance), guided by the following principles:

1. Rule of Law – Adhering to legal and regulatory requirements regarding environmental management:
 - 1.1 Continuously develop safety, occupational health, and environmental systems in accordance with applicable laws, international standards, and adopted regulations to instill a safety culture.
 - 1.2 Submit annual reports to government agencies regarding compliance with environmental impact mitigation and monitoring measures.
 - 1.3 Submit annual waste and unused material reports to relevant government agencies.
 - 1.4 Conduct industrial hygiene assessments and workplace environment measurements.
2. Ethics – Uphold morality and contribute to society, ensuring ethical business practices and promoting self-development among employees and the community:
 - 2.1 Conduct annual employee health check-ups.
 - 2.2 Treat all employees equally in areas such as hiring, development, and career advancement.
 - 2.3 Support and encourage volunteer activities.

3. Participation – Engage stakeholders, including the public and employees, to express views and collaborate on preventive and corrective measures, including fostering a positive work atmosphere and listening to employee feedback.
4. Accountability – Promote awareness of social responsibility, responsiveness to public concerns, respect for differing opinions, and acceptance of outcomes from one's actions:
 - 4.1 Safety is a shared duty. Supervisors must lead by example and ensure compliance with safety and occupational health rules by all internal and external stakeholders.
 - 4.2 Establish procedures for complaint handling, cause investigation, and prompt resolution when issues arise from Company activities.
 - 4.3 Expand green areas in operational zones to reduce dust, improve safety perception among communities, and enhance aesthetics.
 - 4.4 Proactively prevent and assess environmental risks and ensure effective implementation of risk prevention and mitigation systems.
5. Sustainability – Manage and utilize limited resources effectively for collective benefit. Promote efficient use, high-quality products and services, global competitiveness, and preservation of natural resources:
 - 5.1 Campaign for resource conservation to build awareness among employees.
 - 5.2 Implement quality management systems in line with standards such as ISO/TS16949, ISO14001, and ISO50001.
 - 5.3 Allocate suitable resources—budget, time, personnel—for safety, occupational health, and environmental system implementation.

3.1.2. Policy and Guidelines on Employee Compensation and Benefits

Definitions:

Compensation refers to salaries, wages, and other monetary benefits that are provided in accordance with job responsibilities, knowledge, skills, and individual employee performance.

Benefits refer to financial support, goods, or services provided by the Company to employees to alleviate hardships or enhance their quality of work life.

Policy:

The Company establishes its compensation and benefits policy based on the following considerations:

1. Employee job responsibilities.
2. The overall national economic conditions that may affect employees' livelihoods.
3. Wage rates and labor market conditions, particularly within the same industry.
4. Business growth trends and the Company's financial capacity.

Practices:

1. Establish a salary structure and wage rates for each position based on educational qualifications and work experience as a standard framework for compensation management, ensuring fairness and uniformity across all departments.

2. Regularly survey market wage rates and benefits to ensure that the Company's compensation and benefits remain competitive and appropriate for business operations and labor market conditions.
3. Develop a performance evaluation system that accurately reflects individual employee contributions, serving as a basis for fair salary adjustments and increments.
4. Consider special wage adjustments in specific cases, such as adjustments in response to changes in the minimum wage or rewarding employees who dedicate their time, knowledge, and expertise to significantly exceed performance targets. This aims to recognize and motivate employees.
5. Prioritize job responsibilities to determine appropriate compensation and remuneration based on the value of the work performed.
6. Establish clear policies and guidelines for annual salary increments to provide supervisors with a standardized framework, ensuring consistency in salary adjustments across departments and preventing unfair compensation management practices.

3.1.3. Policy and Practice on Employee Knowledge and Capability Development

Definition:

Knowledge and capability development refers to the process of improving knowledge, skills, work methods, and instilling a positive attitude to increase employee value, ensure safety, maximize work efficiency, and support a stable livelihood.

Policy:

The Company is committed to continuously and consistently developing employees' knowledge, capabilities, and attitudes – both in job-specific areas and in other areas that nurture individuals to become skilled and virtuous, contributing to the advancement of themselves, the Company, society, and the nation as a whole.

Practices:

1. Conduct needs assessments and analysis for human resource development planning by designing surveys, interviewing supervisors, and analyzing organizational issues to determine appropriate training courses and methods – including learning by studying, doing, teaching, and life experience.
2. Establish a system for recruiting and evaluating trainers to create a database of instructors in various professional fields, helping ensure the quality of seminars and training meets international standards.
3. Implement a process for tracking training effectiveness, such as pre- and post-tests, and collecting feedback from supervisors or internal and external customers.
4. Periodically invite experts from both domestic and international sources to provide knowledge updates, ensuring employees stay informed with current information.
5. Develop a leadership development structure focused on real-work scenarios, aimed at building a pipeline of successors for strategic positions, ensuring continuity in organizational management.
6. Collaborate with academic institutions to design courses that enhance core competencies essential to the organization.

3.1.4 Policy and Practice on Grievance Handling

Definition:

Grievance refers to the process that allows employees to voice concerns or complaints about matters that may negatively impact the organization, other employees, or themselves, enabling management or responsible parties to be informed and address the issues appropriately.

Policy:

The Company promotes a harmonious work environment, encouraging mutual support and respect among employees at all levels. The Company seeks to prevent and resolve employee complaints or dissatisfaction arising from unfair treatment, violation of workplace rules, abuse of authority, harassment, or breaches of ethics or integrity. The Company encourages peaceful resolution through consultation and collaboration.

Practices:

1. Grievance Procedures

1.1 General Cases

1.1.1 The employee shall submit a written complaint, detailing the issue and signing their name, to the department head. The department head, shift supervisor, and division manager shall jointly review and resolve the issue, informing the employee of the outcome within 7 days. If the matter is resolved and clearly explained, the grievance will be considered closed.

1.1.2 If the employee is unable to follow the above procedure due to fear of reprisal or other reasons, they may submit the grievance directly to the HR executive. The HR executive, along with the Director of HR and Administration and relevant division director, shall jointly consider the issue and notify the employee within 10 days.

1.1.3 If the outcome under 1.1.2 remains unsatisfactory, the employee may escalate the grievance to the Managing Director, whose decision shall be final.

1.2 Cases Involving Ethical Violations or Fraud

The employee must submit a written complaint directly to the Managing Director, including details and supporting evidence (if any), and sign the document. The Managing Director's decision shall be final.

2. Grievance Consideration Guidelines

2.1 The Company affirms that employees who raise complaints honestly and in good faith or cooperate in investigations will not face retaliation, such as transfer, demotion, suspension, benefit reduction, threats, or discrimination.

2.2 Employees must submit grievances related only to their own issues and are not permitted to file complaints on behalf of others.

2.3 The Company will not consider anonymous complaints or grievances submitted on behalf of others, as these cannot be verified or fairly assessed.

2.4 The Company and its management will make every effort to keep the complainant's identity confidential. Complainants should avoid discussing the complaint or investigation with other employees during the investigation process.

2.5 All complaints will be investigated confidentially, and appropriate and fair remedies will be implemented.

3.2 Employee Conduct and Treatment of Fellow Employees

Principle:

The Company values the individual rights of every employee and fosters unity and harmony among staff. All employees, regardless of their role, are expected to follow Company rules and work respectfully with one another. Employees must not act immorally or engage in conduct that may harm the Company's reputation or image. This ensures the transparent and fair management of human resources and supports the achievement of business goals effectively.

3.2.1 Policy and Practice on Employee Conduct and Interactions

Definition:

Conduct refers to the general standard of behavior expected of a responsible person. □ Employees and coworkers refer to the employees and staff of Srithai Superware Public Company Limited.

Policy:

The Company will manage its human resources in alignment with its policies, business objectives, and strategies by establishing a clear, transparent, fair, and consistent HR management system. All supervisors are responsible for managing their teams in accordance with the Company's HR system and guidelines.

Practices:

1. Avoid giving gifts to supervisors or receiving gifts from subordinates.
2. Respect the rights of all employees.
3. Executives and supervisors must conduct themselves in a respectable manner, and employees should not act in ways that show disrespect toward them.
4. Maintain discipline and follow Company rules and acceptable customs, whether explicitly stated or not.
5. Foster and preserve unity and harmony among employees, regardless of age, qualifications, race, religion, beliefs, gender, appearance, or job position.
6. Avoid any conduct that could damage the Company's reputation or create future issues.

3.2.2 Policy and Practice on the Prevention of Sexual Harassment in the Workplace

Definition:

Sexual harassment refers to any unwelcome sexual behavior, including sexual advances and physical, verbal, or non-verbal conduct of a sexual nature. If such behavior is rejected or not complied with, it may impact the victim's employment or work environment, creating discomfort, stress, or hostility. Both the victim and the perpetrator may be of any gender and not necessarily of opposite sexes. The perpetrator may be a supervisor, employee representative, supervisor from another department, co-worker, or someone associated with the workplace who is not an employee. Behaviors that constitute sexual harassment include:

1. Physical – e.g., unnecessary or uninvited physical contact or close proximity.
2. Verbal – e.g., inappropriate comments, sexual remarks, rude or insulting language, or any sexually suggestive communication.
3. Gestural – e.g., leering, mocking gestures, discriminatory or degrading actions, or intolerance toward gender diversity.

4. Information-based – e.g., sending targeted messages, images, symbols, or sounds with the intention to harass a specific person.

Policy:

The Company recognizes and respects the individual rights of all employees and is committed to upholding gender equality and human dignity in the workplace.

Practices:

1. Prevention Measures
 - 1.1 Supervisors are strictly prohibited from using their authority, position, or any means to sexually harass employees or job applicants. They must also prevent others from engaging in such harassment.
 - 1.2 Sexual harassment of co-workers, especially during work, is strictly prohibited.
 - 1.3 Preventive measures include:
 - Assessing and improving workplace environments in each department to reduce the risk of sexual harassment.
 - Specifying and providing appropriate and modest employee uniforms.
 - Providing training and education on sexual harassment to employees to raise awareness and reduce risk.
 - 1.4 The Human Resources Department has the authority to warn or advise employees who behave or dress inappropriately, whether intentionally or not. Such behavior or attire may be deemed provocative or lead to sexual harassment.
2. Complaint and Investigation Procedures
 - 2.1 The Human Resources Department at the Head Office is responsible for receiving complaints of sexual harassment. Complainants are assured that their concerns will be taken seriously and handled fairly. Upon receiving a complaint, an investigation committee will be appointed to examine the facts. The complainant may also be asked to report the case to the police, and must cooperate and not unjustifiably refuse to do so, to prevent unfounded accusations.
 - 2.2 During the investigation, confidentiality must be maintained. The investigation committee is prohibited from disclosing the name or information that could cause harm, embarrassment, or intimidation to the complainant. The accused employee must be temporarily suspended from duties.
 - 2.3 It is prohibited to terminate, reassign, or take any retaliatory actions against an employee who submits a complaint about sexual harassment in the workplace.
 - 2.4 If the investigation finds the complaint to be valid, the committee shall prepare a written report, including possible disciplinary actions, for submission to the Managing Director.
3. Penalties

If the investigation confirms misconduct, and the Managing Director concurs, the Company shall impose appropriate disciplinary action based on the severity of the offense. This may include a verbal or written warning, job reassignment, demotion, or dismissal.

If the act constitutes a criminal offense, the Company will forward the investigation findings to law enforcement for legal proceedings.

Here is the English translation of Section 4: Conduct and Responsibility Toward Business Partners:

4. Conduct and Responsibility Toward Business Partners

Principle:

The Company conducts business to achieve the highest benefit for the organization with fairness, transparency, and accountability. It aims to foster good relationships with business partners based on mutual respect and trust, adhering to good practices and agreed-upon terms while treating creditors fairly and upholding business ethics to achieve mutual benefit.

Policy and Practice Regarding Business Partners

Definition:

Business partners refer to individuals or organizations that supply goods and services to the Company.

Policy:

The Company values its business partners throughout the entire process — from sourcing and selection to ongoing collaboration. All activities must serve the best interest of the Company while ensuring fair returns for both parties, thereby fostering sustainable business relationships.

Practices:

1. Treat all business partners equally and fairly, ensuring mutual benefit and value for both parties.
2. Conduct the partner selection process transparently, providing accurate and sufficient information equally to all candidates to promote fair competition. The selection process shall follow these guidelines:
 - Only consider business partners listed in the Company's Approved Vendor List (AVL).
 - The Purchasing Department is responsible for regularly selecting and evaluating vendors based on specific criteria for each product or service group.
 - Vendors must demonstrate the ability to manage and provide efficient services in terms of quality, price, and delivery.
 - Regularly review the qualifications of vendors listed in the AVL to ensure continued compliance with Company standards.
3. Strictly comply with all contractual terms and conditions. If unable to fulfill any obligation, the Company must promptly inform the partner in advance to jointly find a solution.
4. During business negotiations, refrain from requesting or offering any dishonest or unethical benefits.
5. If there is evidence of any dishonest or unethical exchange of benefits, the Company must disclose the issue to the partner and work together to resolve it fairly and promptly.
6. Use only legally licensed products and services, and do not support counterfeit or intellectual property-infringing goods or practices.
7. Safeguard the confidentiality of business partners and do not misuse their information for personal or inappropriate advantage.
8. Do not solicit or recruit staff from business partners using improper methods.
9. Support the social responsibility activities and initiatives of business partners.
10. Encourage business partners to participate in the Company's corporate social responsibility activities and initiatives.

5. Conduct Toward Customers

Principle:

The Company is committed to delivering customer satisfaction and confidence through high-quality products and services at reasonable prices. The Company adheres to conducting business with honesty and integrity, setting competitive product and service standards in the industry, and continuously striving to improve those standards. Additionally, the Company supports activities that build and maintain good relationships with its customers.

Policy and Practice Regarding Customers

Definition:

Customers refer to individuals or entities that purchase or use the Company's products or services, either for direct use, resale, or as components in their own products or services.

Policy:

The Company is committed to maintaining the highest level of customer satisfaction by ensuring fairness in pricing and quality. The Company also continuously develops its products and services to better meet customer needs.

Practices:

1. Treat all customers equally and fairly, ensuring mutual benefit for both parties.
2. Provide accurate, sufficient, and up-to-date information about products and services, enabling customers to make informed decisions. Avoid exaggeration in advertisements or any communication channels that could mislead customers regarding the quality, quantity, or conditions of products or services.
3. Strictly comply with all agreed contracts or conditions. If any condition cannot be fulfilled, the Company must promptly inform the customer to jointly find a suitable solution.
4. Refrain from seeking business advantages through dishonest or inappropriate means, such as offering incentives to customers' employees.
5. Deliver products and services that meet or exceed customer expectations, at fair prices and under fair conditions.
6. Safeguard customer confidentiality and do not misuse such information for personal or improper gain.
7. Respond to customer needs promptly. Provide systems and channels for customers to lodge complaints regarding product and service quality, with a responsible unit in place to follow up and resolve issues effectively.
8. Offer product warranties with reasonable conditions and timeframes.
9. Conduct standardized and reliable customer satisfaction surveys to ensure that products and services genuinely meet customer needs.
10. Support customers' social responsibility activities and initiatives.

6. Conduct Toward Creditors

Principle:

The Company upholds a policy of treating creditors with discipline and transparency. In cases where it is unable to fulfill the terms of an agreement or contract, the Company must proactively engage in negotiations with the creditor to find a mutually agreeable solution and prevent any potential damage. The Company also manages its finances to ensure creditors have confidence in its financial position and debt repayment capabilities.

Policy and Practice Regarding Creditors

Definition:

Creditors refer to banks, financial institutions, legal entities, or individuals – whether related parties or not – who provide loans, assets, or extend credit to the Company, including through product sales or service provision.

Policy:

The Company is committed to treating all creditors with fairness, equality, and transparency, and to strictly complying with the terms and conditions of all agreements and contracts.

Practices:

1. Execute all contracts with creditors in full legal compliance, ensuring equality, fairness, and transparency without taking advantage of the counterparty.
2. Refrain from requesting or offering any dishonest benefits during business negotiations with creditors.
3. If there is evidence of dishonest benefit exchanges, disclose the details to the creditor and work together to resolve the issue fairly and promptly.
4. Do not engage in fraudulent practices or conceal any important information or facts that may cause harm to the creditor.
5. Comply strictly and accurately with all contractual terms and agreements made with every type of creditor.
6. If unable to comply with any specific contract condition, the Company must promptly notify the creditor in advance to jointly consider further actions.
7. Repay all loans and interest in full and on time as agreed with all types of creditors.
8. Regularly report accurate, complete, and timely financial information to creditors.

7. Conduct Toward Business Competitors

Principle:

The Company emphasizes competition based on product and service quality and efficiency, within the framework of competition laws. It upholds the principles of free, fair, and honest competition. The Company promotes transparent cooperation with competitors in ways that benefit consumers and avoids dishonest or unlawful practices, such as concealing agreements or acquiring confidential information through unethical means. These practices are essential to maximizing consumer benefit and maintaining the Company's sustainable leadership in the industry.

Policy and Practice Regarding Business Competitors

Definition:

Business competitors refer to individuals, groups, or organizations that operate in the same or similar industries, offering products or services that meet the needs of the same customer base as the Company.

Policy:

The Company conducts business within a fair and lawful competitive framework, using professional and ethical methods. In cases of collaboration with competitors, such cooperation must be transparent and must not involve any unlawful agreements.

Practices:

1. Operate within the framework of fair and transparent competition, avoiding any abuse of bargaining power to impose restrictive conditions that limit opportunities or choices for business partners, or any conduct that exploits market dominance such as discriminatory treatment among competitors.
2. Do not seek confidential information of competitors through dishonest or improper means, such as offering bribes to competitor employees.
3. Do not tarnish the reputation of competitors through slander, spreading false information, or direct attacks.
4. Avoid price competition or predatory pricing solely to win business.
5. Promote transparent collaboration with competitors for the benefit of consumers, not for monopolization or other unfair business advantages, while ensuring the protection of the Company's trade secrets and proprietary information.
6. Do not solicit competitor personnel to join the Company through unethical means.
7. Do not engage in actions that infringe upon the intellectual property of competitors.
8. Avoid any behavior that could be considered collusion with competitors to monopolize or restrict market competition, such as price fixing, bid rigging, or market allocation agreements.

8. Compliance with Human Rights Principles

Principle:

The Company is committed to sustainable business growth while promoting and upholding respect for human rights throughout the organization. It ensures that all stakeholder groups are treated fairly and equally, with respect for their fundamental rights and freedoms. The Company opposes discrimination, abuse, child labor, forced labor, and human trafficking. Furthermore, the Company encourages its affiliates, business partners, and other stakeholders to acknowledge and adhere to this policy to ensure alignment in practice.

Policy and Practice Regarding Human Rights

Definition:

Human rights refer to fundamental rights that belong equally to all individuals, enabling them to live with dignity and have equal opportunities to learn and fully develop their potential creatively – regardless of differences in race, color, age, religion, language, physical or mental condition, social or political beliefs. These rights are inherent and inalienable, regardless of nationality, language, or religion.

Policy:

The Company respects and complies with human rights principles to protect the rights and freedoms of employees, business partners, and stakeholders, and to prevent violations.

Practices:

1. Treat employees, partners, and stakeholders equally and without discrimination. Differences such as race, color, religion, beliefs, gender, sexual orientation, language, marital status, age, disability, personal opinions, political affiliation, nationality, physical or mental health, and others must not influence decisions related to employment, remuneration, welfare, promotion, training, or partnership agreements.
2. Respect labor rights and prohibit forced labor:
 - No coercion physically, verbally, or mentally, and no threats of punishment or confiscation of personal documents such as ID cards or passports.
 - Do not employ child labor or workers bound by debt or other involuntary obligations.

3. Do not support physical punishment, threats of harm, or physical or mental coercion.
4. Allow employees to leave the workplace freely at the end of their normal shift without restriction or confinement.
5. The Company will not deduct any payments upon termination of employment or resignation, unless otherwise agreed upon in writing between the Company and the employee.
6. Establish measures and guidelines to prevent and resolve conflicts, and assess potential human rights risks affecting employees, partners, or stakeholders. This ensures all parties can address concerns and share a mutual understanding of human rights.
7. Promote good labor relations between the Company and employees by allowing employees to express opinions or make constructive suggestions. The Company also supports employee participation in activities that benefit the community, society, and the environment around all company locations.

9. Responsibility to Society, Community, and the Environment

Principle:

The Company recognizes that sustainable business growth is not solely based on profit generation, but also on conducting operations with consideration for the benefits and impacts on society, communities, the environment, and stakeholders. Therefore, the Company integrates the principles and concepts of social responsibility into its management approach, ensuring that its operations and activities align with societal expectations and genuinely give back to the community. This fosters a harmonious coexistence between the organization and society, and supports long-term business growth within the communities in which the Company operates.

Policy and Practice

9.1 Policy and Practice Related to Society

Definition:

Society refers to the co-existence of people in various forms of relationships, such as those based on occupation, age, gender, religion, residence, etc. It also encompasses the relationship between living beings and the environment, shared interests among groups, and cultural elements like language, traditions, and food practices within each society.

Policy:

The Company places great importance on environmental conservation, which in turn benefits communities, society, and the long-term sustainability of the business.

Practices:

1. Take responsibility and remain committed to preserving the environment and respecting local customs and traditions in areas where the Company operates.
2. Regularly carry out activities that contribute to the well-being of society, the community, and the environment—either independently or in collaboration with government and community sectors—to improve the quality of life in the communities where the Company is located.
3. Prevent accidents and maintain waste levels below acceptable standards.
4. Respond swiftly and effectively to incidents that impact the environment and community resulting from the Company's operations, in full cooperation with government agencies and relevant authorities.

9.2 Policy and Practice on Community Development

Definition:

Community refers to a group of people living in the same area who depend on and support one another.

Policy:

The Company operates its business with a strong sense of social responsibility and commitment to all stakeholder groups. It emphasizes supporting activities that improve quality of life and promote well-being in the communities and societies where it operates. The Company also encourages employee and stakeholder participation in contributing to the community.

Practices:

1. Provide appropriate support and assistance to society and the community.
2. Conduct business with consideration for environmental and community impacts, while encouraging stakeholder participation in maintaining environmental quality.
3. Care for the environment surrounding the community by managing waste disposal from both production processes and general operations, as well as preventing contamination from entering the external environment.
4. Build strong relationships and community engagement processes in collaboration with relevant agencies.
5. Listen to opinions, suggestions, and/or complaints from stakeholders to collaboratively find solutions and address the needs of relevant stakeholders.
6. Support foundations and charitable organizations to help, develop, and promote improved living conditions and quality of life for members of society.
7. Promote and campaign for the Company to be a "White Workplace" – free from drugs and gambling.
8. Regularly disseminate useful information and news to the community.

9.3 Policy and Practice on Conducting Business in Accordance with Environmental Standards

Definition:

Environment refers to everything surrounding human beings, both living and non-living, tangible (physically visible or touchable) and intangible (such as culture, traditions, beliefs). All environmental elements are interconnected and interdependent—impacts on one part inevitably affect the others. Thus, the environment functions as a continuous and interconnected system or cycle.

Policy:

The Company recognizes its social responsibility and commitment to being environmentally friendly. It considers environmental stewardship a direct responsibility of all employees and is genuinely committed to the continuous improvement of its environmental management system.

Practices:

1. Comply with all environmental laws, standards, and regulations related to the Company's activities and be willing to disclose such information to the public.

2. Commit to developing and continuously improving the ISO 14001 environmental management system to achieve established goals and objectives. This includes providing training at all organizational levels to enhance understanding of the system and maximize the benefits of implementing ISO 14001.
3. Prevent, control, and reduce environmental risks and/or impacts.
4. Provide training, raise awareness, and instill environmental consciousness among all employees, as well as among visitors, suppliers, business partners, and service providers.
5. Emphasize energy and resource conservation to achieve optimal efficiency and benefit.
6. Communicate and promote environmental management practices to ensure that employees are informed and can apply them correctly and consistently.

Section 2: Organizational Management

1. Anti-Corruption and Bribery

Giving or Receiving Bribes, Gifts, or Entertainment

Principle:

The Company conducts its business in full compliance with the law and the highest ethical standards, with zero tolerance for offering or accepting bribes, inducements, rewards, entertainment, or any form of corruption. It is the duty of all executives and employees to perform their responsibilities with honesty and integrity, in alignment with the Company's Code of Conduct. The Company also provides channels for all stakeholders to report misconduct or violations of laws, regulations, and policies to ensure that its business operations remain free from bribery, inappropriate gift-giving, entertainment, and all forms of corruption.

Relevant Policy and Practices

1.1 Policy and Practice on Anti-Corruption and Prohibition of Bribery for Business Gain

Definition:

Bribery refers to offering, promising, giving, soliciting, or receiving any benefit—whether monetary or otherwise, directly or indirectly—to gain or retain business, secure a contract, receive special treatment, or maintain any other advantage in a way that violates business ethics, involving either public or private sector entities.

Policy:

The Company places great importance on anti-corruption and prohibits all forms of bribery for business benefits, both within the Company and across its subsidiaries.

Practices:

1. Do not offer or encourage the giving or receiving of gifts, entertainment, or expenses that are excessive or inappropriate.
2. Do not make facilitation payments or any unofficial payments—whether directly or indirectly—to expedite or simplify any business process.
3. Absolutely prohibit all forms of bribery in business operations, whether carried out directly or through third parties.
4. Conduct procurement and sourcing activities with transparency, honesty, integrity, and in accordance with applicable laws and regulations.

5. Do not provide political contributions, directly or indirectly, to political parties, party officials, candidates, organizations, or individuals involved in politics as a means of securing business advantages—unless such contributions are made transparently and in full compliance with the law.
6. Continuously monitor, audit, and implement preventive measures against any actions that may suggest corruption or bribery within the organization.
7. Promote and raise awareness at all organizational levels regarding anti-corruption practices and the prohibition of bribery.

1.2 Policy and Practice on Giving Gifts or Entertainment

Definition:

Gift refers to an item or any form of offering given on special occasions or as a gesture of goodwill, not involving a commercial transaction. A gift is voluntarily given without expecting anything in return, though there may be social expectations of reciprocity.

Entertainment refers to activities that provide enjoyment, pleasure, or amusement, such as entertainment programs, movies, music, theater, sports, literature, games, dining, recreation, or social gatherings.

Policy:

The Company upholds a policy that all transactions, including the sale of goods or services and other business dealings with external parties, must be conducted fairly and transparently. The acceptance or offering of bribes, gifts, rewards, or entertainment for the purpose of influencing decision-making is strictly prohibited.

Practices:

1. Employees must not solicit or accept money, gifts, or other benefits from individuals or entities doing business with the Company.
2. Employees may give or accept gifts or entertainment only in accordance with customary practices, provided such acceptance does not influence any business decision.
3. Received gifts should not exceed a value of THB 3,000 and must not be in the form of cash or cash equivalents.
4. If employees receive a gift or entertainment valued over THB 3,000 on customary occasions from a business-related party, they must report it to their supervisor for further review and approval.
5. The giving or receiving of gifts or entertainment must be done transparently, in public, or in a manner that can be disclosed.
6. If an employee receives an invitation to travel abroad (not related to work) with expenses covered by a business-related party, the invitation must be submitted to the Managing Director's Office for review. A senior executive may propose the name of an employee to participate, subject to approval by the Managing Director.

2. Prevention of Conflicts of Interest

Principle:

The Company conducts business with honesty, transparency, and accountability. All executives and employees are required to avoid any involvement or actions that may conflict with the Company's interests, potentially causing harm or reducing their effectiveness in fulfilling their duties. All actions must prioritize the best interests of the Company and be fair to all stakeholders.

2.1 Policy and Practice on Conflicts of Interest

Definition:

A conflict of interest is any action that may cause an employee, due to their position or duties, to act, make decisions, authorize, or approve actions that are biased or influenced by personal interests, thereby impacting the interests of the Company.

Policy:

The Company upholds the principle of prioritizing the Company's interests in all actions and will not allow engagement in activities that could lead to personal conflicts of interest involving directors, executives, employees, customers, or competitors.

Practices:

1. Comply with Company rules and regulations and devote full working time and effort to the Company's interests without engaging in outside businesses that do not benefit the Company.
2. Do not take external positions or hold shares in competing businesses without prior approval from senior management or the Board of Directors, as applicable.
3. Do not disclose any confidential information obtained while working at the Company to any third party, during or after employment. If involvement in such external businesses or shareholding occurred before joining the Company or before the Company began doing business with them, this must be reported to the Board or supervisors for consideration.
4. Do not use undisclosed internal information, as defined by the rules of the Stock Exchange of Thailand or applicable law, for personal gain or the benefit of family members or outsiders.
5. Perform duties without the intention of benefiting oneself or any specific person, and under conditions or prices equivalent to those offered to third parties.
6. Use the Company's resources efficiently and responsibly for the benefit of the Company only, not for personal use.

3. Company Securities Trading and Information Disclosure

Principle:

The Company allows its executives and employees to invest in Company securities but prohibits the use of insider information for trading. Securities transactions (buying, selling, transferring, or receiving transfers) should only be conducted during the designated periods specified in the Company's Insider Trading Policy. Insider information is considered a crucial factor influencing investors' decisions and may constitute business secrets. Therefore, it must be protected from leakage and misuse for the benefit of any individual or group. The Company also emphasizes timely, accurate, and complete information disclosure to ensure fairness and equality for all stakeholders.

3.1 Policy and Practice on Media Relations

Definition:

Mass media refers to intermediaries that convey messages from a source to an audience to achieve communication objectives.

Information refers to any data that conveys facts or narratives, emphasizing meaning rather than form.

Policy:

The Company prioritizes accurate and timely information disclosure to the media so that such information can be effectively communicated to the public.

Practices:

1. Disclose accurate, clear, and relevant information to the media equally through various channels.
2. Communicate information promptly and in a timely manner.
3. Allow the media to meet with the Chairman, Managing Director, or designated spokespersons.
4. Facilitate media representatives who wish to contact the Company.
5. Build good relationships with the media by organizing factory or site visits to showcase operations and provide accurate information.
6. Hold press conferences when special Company events may impact stakeholders.
7. Comply with the Stock Exchange of Thailand (SET) regulations on information disclosure for listed companies.

3.2 Policy and Practice on Use of Insider Information**Definition:**

Insider information refers to financial or other non-public information that may affect business operations or the Company's stock price—such as unpublished financial results, market share data, marketing strategies, production techniques, or intellectual property.

Excluded are:

- Public information
- Information disclosed by court order or authorized government officials

Policy:

The Company values equality and fairness among all shareholders—both executives and non-executives—as well as other stakeholders. Measures are in place to prevent directors and executives from disclosing insider information for improper personal or third-party gain.

Practices:

1. Establish clear responsibilities for safeguarding, preventing misuse, and controlling the disclosure of insider information.
2. Directors, executives, and employees must not use insider information for personal benefit in stock trading or disclose it to others for trading purposes.
3. Directors, executives, and employees in related units—including spouses and minor children—are prohibited from using non-public insider information for personal or third-party gain.
4. Directors, executives, and employees with access to insider information (e.g., Company Secretary, Investor Relations, accounting and finance staff) must refrain from trading Company stock within 30 days before financial disclosure or release of significant Company information. They should also wait at least 24 hours after public disclosure before trading. Any trades within restricted periods must be reported to a supervisor with written explanation within 3 working days to ensure transparency and avoid suspicions of insider trading.
5. Directors and executives must report their shareholdings in accordance with legal requirements and submit reports to the Board or Company Secretary within the specified time. Failure to do so is considered a disciplinary offense under Company rules.

3.3 Policy and Practice on Confidentiality**Definition:**

Confidentiality refers to the assurance that data—whether related to the Company, customers, or business partners—is protected and accessible only to authorized persons.

Policy:

The Company places great importance on handling internal information and data confidentiality to prevent misuse for unauthorized personal gain.

Practices:

1. Directors, executives, employees, and relevant personnel who work with confidential or sensitive documents—including undisclosed stock exchange information, bid data, or business plans—must protect such information as Company assets. Confidentiality is crucial for achieving business goals and ensuring organizational stability. All personnel are responsible for protecting confidential information and avoiding accidental disclosure.
2. Data classification levels: Confidential business information must not be leaked to external parties. Confidentiality levels range from publicly available data to internal use, restricted, confidential, and highly confidential. Information sharing must be limited to those with responsibilities directly related to the data.
3. Disclosing information externally: All public or external communications must be approved by the Managing Director or designated representatives. A designated central unit handles public and investor communications (IR), coordinating with data-owning units to compile and summarize the information before obtaining approval for release.
4. Employees must not respond to external inquiries or express opinions unless officially assigned. If not authorized, employees should politely decline and refer the inquiry to the Managing Director or designated spokesperson.

3.4 Policy and Practice on Information Security

Definition:

Information Security refers to the implementation of systems to ensure the security of information, taking into account the nature, size, and complexity of the business as well as relevant rules and regulations. The objective is to prevent risks related to information technology and cybersecurity.

Policy:

The Company recognizes the importance of ensuring the security and reliability of its information, systems, and digital assets. Information and IT assets must be properly protected with regard to potential cybersecurity and information security threats. Measures must be in place to safeguard confidentiality, integrity, accuracy, completeness, and availability of information in alignment with applicable rules, regulations, and information security laws.

Practices:

1. IT Security Policy: □ The Chief Information Officer (CIO) is responsible for developing and updating the Information Security Policy at least once per year or as needed. The policy must be approved by the Board of Directors or the assigned authority and be documented in an easily accessible location for relevant users. The Company must also provide annual training on emerging cybersecurity threats to ensure employees are aware and capable of basic self-protection.
2. Segregation of Duties: □ The CIO must clearly define job responsibilities for each IT-related position. Employees must be informed of their roles and responsibilities, and relevant training must be provided. Records of such training should be maintained.

3. **Physical Security of the Data Center:** □ Access to the data center must be controlled by assigned personnel. Key equipment must be securely stored. Entry and exit logs must record personal details and timestamps and be regularly reviewed. The data center must be equipped with fire prevention and detection systems and uninterruptible power supply (UPS) systems for servers and networking devices to prevent damage from power instability. Environmental controls must maintain proper temperature and humidity levels suitable for IT equipment.
4. **Information and Network Security:** □ Safeguards must be in place to protect information, computer systems, and network infrastructure from unauthorized access and attacks.
5. **Wireless LAN Access Control:** □ Access to wireless networks must be controlled to prevent unauthorized connections.
6. **System Development and Changes:** □ Changes to or development of computer systems must be controlled through proper processes to prevent operational disruption.
7. **Data Backup and IT Continuity Plan:** □ Data must be backed up regularly, and a contingency plan must be in place to ensure business continuity during emergencies.
8. **Computer Operation Control:** □ Daily IT operations must be monitored and controlled to ensure smooth system performance.
9. **IT Outsourcing Control:** □ The use of external IT service providers must be closely monitored and controlled.
10. **Personal Computer Usage Control:** □ The use of personal computers must follow Company guidelines to prevent data loss and unauthorized access.
11. **Risk Prevention on Data Inaccessibility:** □ Measures must be in place to mitigate the risk of data being inaccessible due to technical failures or external threats.
12. **Computer System Standards:** □ The Company must define and maintain standards for computer systems to ensure compatibility, security, and efficiency.
13. **Software Licensing and Intellectual Property:** □ Only properly licensed software may be used. The Company must respect intellectual property rights and avoid unauthorized software usage.

4. Preservation and Use of Company Assets and Resources

4.1 Policy and Practice on Intellectual Property Protection

Principle:

The Company requires all executives and employees to properly use, maintain, and protect the Company's assets. Resources must be used responsibly, lawfully, and with full awareness of value. Intellectual property must not be infringed in any form or circumstance. The Company also promotes awareness, communication, and relevant activities, and provides tools and services necessary to foster responsibility among employees at all levels—encouraging proper and efficient use of assets and resources to deliver valuable outcomes that benefit both the Company and society as a whole.

Definition:

Intellectual Property (IP) refers to legal rights that grant the owner or “rights holder” control over creations derived from human intellectual effort. It includes two main categories:

1. **Industrial Property** – Refers to innovations relating to products, processes, techniques, or designs used in industry, including trademarks and geographical indications.
 - 1.1 **Patents:** Legal documents granted by the state to protect:

- Inventions: Creative ideas involving product components, structure, or production methods.
 - Product Designs: Aesthetic and distinctive appearance designs.
 - Utility Models (Petty Patents): Inventions with less technical advancement than patents.
- 1.2 Trademarks: Marks used with goods or services:
- Trade Marks: Marks distinguishing products from those of others.
 - Service Marks: Marks distinguishing services (e.g. airlines, banks, hotels).
 - Certification Marks: Marks certifying quality of others' goods/services.
 - Collective Marks: Used by members of the same group or organization.
- 1.3 Layout Designs of Integrated Circuits: Plans showing connections within circuits like conductors and resistors.
- 1.4 Trade Secrets: Confidential business information with commercial value due to its secrecy.
- 1.5 Geographical Indications: Names or signs indicating product origin and quality, reputation, or characteristics tied to that origin.
2. Copyrights – Protection for literary, artistic, musical, cinematic, and scientific works, including:
- Neighboring Rights: Rights of performers, producers, and broadcasters over performances and recordings.
 - Computer Programs: Sets of instructions directing computer operations.
 - Databases: Compilations of data for various uses.

Policy:

The Company is committed to strictly complying with all applicable intellectual property laws and will not infringe upon any form of intellectual property rights.

Practices:

1. Encourage and support employees to apply their knowledge and creativity in producing innovative works.
2. All works created in the course of employment are considered the Company's intellectual property. Employees must register copyrights for their work and transfer rights to the Company.
3. Upon termination of employment, employees must return all intellectual property to the Company, including inventions and materials in any format.
4. Employees using Company computers must only use software provided or licensed by the Company. Copying or using software for personal purposes is prohibited to prevent IP infringement.
5. If an employee uses Company computers for personal work or installs unauthorized programs, they are fully responsible for any resulting damages.
6. Any external intellectual property (e.g. third-party works or data) intended for use in Company operations or product manufacturing must be reviewed and approved by the relevant supervisor and legal department to ensure compliance. Any employee who violates this policy will be subject to disciplinary action according to Company regulations.

4.2 Policy and Practice on Employees' Responsibility for Company Assets

Definition:

Company assets refer to both tangible and intangible items that may have monetary value. Tangible assets include things like buildings, office equipment, and vehicles. Intangible assets include technology, academic knowledge, intellectual property rights (e.g., copyrights, patents), and confidential information not publicly disclosed, such as business plans, financial forecasts, and human resource data.

Policy:

The Company is committed to protecting and ensuring the proper use of its assets. Employees who are assigned or authorized to use or possess Company assets during the course of their responsibilities must care for, store, and use those assets appropriately and efficiently to ensure that the investment in such assets brings optimal value to the Company.

Practices:

1. Employees using Company assets must be directly responsible for them and use them only as part of their official duties or assigned responsibilities.
2. Asset users must prevent any loss or damage to Company assets, use them efficiently to benefit the Company, and must not use them for personal gain or for others.
3. Employees must exercise due care and act responsibly in preserving assets under their control and responsibility.
4. Asset users are responsible for performing regular maintenance as specified in the asset user manual or as per Company guidelines to keep assets in good working condition at all times.
5. Employees must maintain up-to-date records of any maintenance or repairs performed on the assets under their responsibility.
6. Employees must return all Company assets, along with all related accessories, in complete and functional condition before or on the day they leave their position or complete their assignment.
7. In the event of loss or damage to assets during work operations, employees are liable for compensation only if the damage results from willful misconduct or gross negligence. In such cases, the incident must be reported immediately to the supervisor for further investigation and accountability.
8. If the damaged or lost asset is covered under an insurance policy, compensation shall be considered only for the portion not covered by the insurance.
9. All employees must strictly avoid disclosing or misusing confidential Company information.

4.3 Policy and Practice on the Efficient Use of Resources

Definition:

Resources refer to raw materials, production factors, consumable supplies, and other items used in production or operations, including in factories and offices.

Policy:

The Company places great importance on the efficient and cost-effective use of resources. All executives and employees are responsible for using and managing resources in a way that maximizes value, efficiency, and minimizes loss or damage.

Practices:

1. Procure and select appropriate resources that are environmentally friendly.
2. Annually plan and set goals to improve the efficiency of resource utilization.

3. Monitor and review resource usage monthly, including sharing and comparing usage data among various factory and office sites.
4. Define and develop operational standards to serve as guidelines for efficient resource utilization.
5. Eliminate waste generated from resource usage and limit emissions or disposals in accordance with government regulations.
6. Communicate the Company's performance results to raise awareness among employees at all levels about the importance of efficient and cost-effective resource usage, with ongoing campaigns and follow-ups.

4.4 Policy and Practice on Energy Conservation

Definition:

Energy refers to what enables objects or systems to move or function. In industry, energy comes in many forms—electricity, water, and consumable energy sources. □ Consumable energy refers to energy that is depleted upon use, including coal, oil shale, oil sands, crude oil, fuel oil, and natural gas.

Policy:

The Company recognizes the importance of energy management and is committed to continuous development and improvement of energy-saving measures. Energy conservation is treated as a shared responsibility, aiming to bring maximum benefit to the organization and society.

Practices:

1. Develop and implement an appropriate energy management system, integrating energy conservation into daily operations. Comply with all energy-related laws, regulations, and applicable energy usage and efficiency standards.
2. Continuously monitor and improve the organization's energy performance indicators, adapting to business needs, technology used, and best operational practices.
3. Set and annually review energy conservation objectives, goals, and action plans, and communicate them clearly to all employees for proper understanding and implementation.
4. Promote the procurement of machinery, tools, equipment, and services that prioritize energy efficiency, and encourage energy-efficient design to improve performance.
5. Provide sufficient resources and information to achieve energy goals and maintain an effective energy management system.
6. Promote and support company-wide participation in energy conservation initiatives and programs.
7. The management and energy management team shall review and adjust energy policies, goals, and action plans as appropriate.
8. Disclose the Company's energy conservation performance as a way to drive continued awareness and commitment. Energy conservation is the duty and responsibility of every employee, who must strictly adhere to and cooperate in implementing the Company's established energy-saving measures.

5. Whistleblowing and Complaint Handling

Principle:

The Company is committed to compliance with applicable laws, rules, and regulations, and to establishing an adequate internal control system to reduce the risk and opportunity of

wrongdoing or fraudulent acts. To enhance the effectiveness of investigations, the Company provides channels for all stakeholders to report suspected fraud, violations of laws, or breaches of regulations. This promotes prevention and reduces the likelihood of wrongdoing within the Company through a fair and appropriate consideration process.

5.1 Whistleblowing Policy

Definitions:

Whistleblowing: Providing information or reporting suspected fraud or misconduct to the Company for the purpose of fact-finding and using such information as evidence for disciplinary action.

Complaint: A report submitted by an employee or stakeholder to request assistance, relief, or a fact-finding inquiry due to injustice, distress, or witnessing a legal violation.

Fraud: Dishonest or unethical conduct intended to obtain undue advantage for oneself or others. This includes embezzlement of Company assets, corruption, conflicts of interest, accounting manipulation, forgery, and all forms of bribery.

Policy:

The Company adheres strictly to legal and regulatory compliance and has implemented internal control systems to minimize risks of improper or fraudulent actions. Stakeholders are encouraged to report misconduct, regulatory violations, or fraud. The Company guarantees an impartial and fair process to support prevention and reduce the risk of corruption.

Practices:

1. How to Submit Complaints/Whistleblowing Reports
Reports concerning fraud or legal/regulatory violations must be submitted in writing only.
2. Channels for Submitting Complaints □ Complainants may report directly to any of the Independent Directors through the following methods:
 - 2.1 Via email, as provided on the Company's website under the *Whistleblower* section.
The report may be sent to any one or all of the following Independent Directors:

Mr. Enghug Nonthikarn	Email: enghug_non@srithaisuperware.com
Mr. Suchat Boonbancherd Sri	Email: suchat_boo@srithaisuperware.com
Mrs. Siriporn Sailasoot	Email: siriporn_sai@srithaisuperware.com
Mr. Supachoke Liamkaew	Email: supachoke_liam@srithaisuperware.com
 - 2.2 By post addressed to the Independent Director at:
Srithai Superware Public Company Limited OR P.O. Box 84, Ratburana District, Bangkok 10140
 - 2.3 Submit a sealed envelope marked for delivery to the Independent Director via the Secretary of the Audit Committee (Head of Internal Audit). □ Reports submitted under sections 2.1 and 2.2 do not require the complainant to reveal their identity. However, if willing, the complainant may provide their name, phone number, or email address to facilitate follow-up and feedback from the Company.
3. Investigation of the Facts
 - 3.1 The Independent Directors, either as a committee or by at least one assigned member, will investigate the report. They may involve the external auditor, the Head of Internal Audit, or any executives deemed unrelated to the matter.

The investigation must be completed, or progress reported, within 30 days of receipt of the complaint.

All information gathered during the investigation is confidential and disclosed only as necessary, prioritizing the safety and privacy of the complainant.

3.2 Once the investigation is concluded, the Independent Director will present findings and recommended corrective actions to the Audit Committee for consideration, and subsequently to the Board of Directors for acknowledgment or further action.

4. Disciplinary Actions

Any person—Director, Executive, or Employee—found to have violated laws, regulations, or Company rules, or to have engaged in fraudulent or corrupt acts for personal or others' benefit, either directly or indirectly, shall face disciplinary action under Company regulations. Penalties shall follow the guidelines set out in the Corporate Governance Handbook and may include legal proceedings.

5.2 Policy and Guidelines on the Protection and Fair Treatment of Individuals Reporting Misconduct, Corruption, or Non-Compliance with Laws, Regulations, and Policies

Definitions:

1. Misconduct or Non-Compliance with Laws, Regulations, and Policies refers to any actions taken by directors, executives, or employees of Srithai Superware Public Company Limited (“the Company”) that the complainant has witnessed or become aware of, supported by sufficient information and evidence, and which are considered improper or incorrect.
2. Eligible Whistleblowers or Complainants (“Complainants”) refer to:
 - 2.1 The Company's external auditor;
 - 2.2 General individuals including employees of Srithai Superware Public Company Limited and its affiliates.
3. Independent Director means a director of Srithai Superware Public Company Limited who meets the criteria for independence under the Capital Market Supervisory Board Notification No. TorJor. 4/2552 and its amendments.
4. Affiliate refers to:
 - (a) Any legal entity in which Srithai Superware Public Company Limited holds more than 50% of the total voting rights;
 - (b) Any legal entity in which an entity under (a) holds more than 50% of the total voting rights;
 - (c) Any legal entity indirectly held by the Company through chains of ownership described in (a) and (b) with more than 50% voting rights at each level;
 - (d) Any legal entity over which the Company or its subsidiaries have the power to participate in financial and operational policy decisions without having full control.

Policy:

The Company is committed to compliance with laws, regulations, and internal policies, and to maintaining a robust internal control system to reduce risks and opportunities for misconduct or corruption. To enhance the effectiveness of oversight and ensure fairness, the Company allows stakeholders to report or provide information on suspected misconduct or violations of laws and regulations.

Practices:

1. Methods for Reporting or Providing Information

1.1 If the Complainant is the Company's Auditor:

The auditor must notify the Audit Committee of any suspected offenses by directors, executives, or responsible persons that may violate the Securities and Exchange Act B.E. 2535 and its Amendment No. 4 B.E. 2551, including:

- (1) Breach of fiduciary duty resulting in damage to the Company or undue benefit to oneself or others;
- (2) Damaging or misusing assets or documents held as evidence;
- (3) Fraud or concealment of material information from the public;
- (4) Fraudulent acts causing harm to the Company's property;
- (5) Embezzlement of Company assets;
- (6) Causing the Company's assets to become devalued or useless;
- (7) Acts to avoid debt repayment;
- (8) Corrupt acts for personal or third-party gain;
- (9) Manipulation or falsification of accounts or documents.

1.2 If the Complainant is a General Individual:

Reports can be submitted to an Independent Director via email, post, or sealed envelope addressed through the Internal Audit Office.

2. Investigation of Facts

2.1 If the Auditor is the Complainant:

The Audit Committee may assign the Head of Internal Audit to conduct a confidential investigation with input from uninvolved directors or executives, and submit a report or progress update within 15 days.

The Audit Committee must report initial findings to the SEC and the auditor within 30 days of receiving the report.

2.2 If a General Individual is the Complainant:

- (1) The Independent Director refers the matter to Internal Audit.
Internal Audit must complete the investigation within 30 days and report findings or progress.
- (2) If the complaint lacks sufficient merit, the Head of Internal Audit shall prepare a summary report and inform the Independent Director and Audit Committee.
If sufficient merit exists, the Head of Internal Audit must submit the findings to the Audit Committee within 30 days.
- (3) The Audit Committee reviews findings and proposes corrective and preventive actions to the Board of Directors.
- (4) The Board reviews and directs the appropriate implementation.
If the complainant identified themselves, they shall be informed of the outcome.

3. Protection of Whistleblowers

3.1 Complainants, except auditors, must not publicly disclose their identity or the matter reported.

3.2 Directors or responsible parties must maintain confidentiality and prevent unauthorized disclosures.

3.3 If the complainant is at risk of harm during the investigation, they may request the Company to provide interim protective measures.

6. Internal Control, Internal Audit, and Financial Reporting System

Principle:

The Company ensures that its internal control and internal audit systems are effective at all operational levels. These systems are regularly assessed to confirm that they are properly designed and effectively implemented. This helps the Company prepare accurate and timely financial reports for stakeholders and provides reasonable assurance that such reports are not materially misstated. The integrity of these reports builds investor confidence and supports the sustainable growth of the Company's business.

Policy and Guidelines on Internal Control and Financial Reporting

Definition:

Internal Control System refers to a set of processes established to provide reasonable assurance that the Company's operations achieve their objectives effectively and efficiently. This includes safeguarding assets, preventing or reducing errors, losses, and fraud, ensuring the reliability of financial reporting, and compliance with applicable laws, rules, and regulations.

Policy:

The Company recognizes the importance of managing its internal control system effectively at all levels. To meet this goal, the Company has established internal control procedures and guidelines that must be strictly followed.

Practices:

1. The Company's Board of Directors is responsible for the financial statements of the Company and its subsidiaries, as well as the financial information presented in the annual report. These are prepared in accordance with generally accepted accounting standards under the Accounting Act B.E. 2543 (2000) and the requirements of the Securities and Exchange Commission of Thailand (SEC) for financial reporting under the Securities and Exchange Act. The Board ensures the selection and consistent application of appropriate accounting policies, including the incorporation of any changes in accounting standards, and adequate disclosure of material information in the notes to the financial statements for the benefit of shareholders, general investors, and stakeholders.
2. The Board of Directors and management are responsible for ensuring the accuracy, completeness, and timeliness of both annual and quarterly financial reports. These are prepared in accordance with generally accepted accounting principles, and a Statement of the Board of Directors' Responsibility for Financial Reports is published in the Company's annual report.
3. The Company maintains a risk management system and internal control system to ensure that financial reporting is accurate, complete, and timely, to safeguard its assets, and to prevent fraud or significant irregularities.
4. The Company has appointed an Audit Committee to review accounting policies, the quality of financial reporting, internal control systems, internal audit processes, risk management systems, and disclosure of related party transactions. The Company ensures regular audits and evaluations of performance, covering both policy and practice, financial management efficiency, operations, and other relevant controls. These audits are carried out by the Company's internal audit unit, which operates independently, as well as by external certified auditors.
5. The Company conducts an annual assessment of the adequacy of its internal control system in accordance with the criteria set by the Stock Exchange of Thailand.

6. The internal audit unit reports directly to the Audit Committee. Audit activities are based on an annual audit plan aligned with the COSO framework (The Committee of Sponsoring Organizations of the Treadway Commission) and approved annually by the Audit Committee.

7. Investment and Supervision of Operations in Subsidiaries and Associates

Principle:

The Company has a policy to invest in businesses that align with its objectives, vision, and strategic growth plans, with the aim of enhancing profitability or increasing competitive capabilities. These investments are intended to help the Company achieve its goal of becoming a leading enterprise in its core business sectors.

The Company has established policies for investment and supervision of operations in its subsidiaries and associates, with the objective of setting forth direct and indirect mechanisms and measures that enable the Company to effectively oversee and manage the operations of such entities. These measures ensure that subsidiaries and associates operate in accordance with the Company's policies, as though they are internal units of the Company, and comply with relevant laws and regulations as stipulated by the Capital Market Supervisory Board, the Securities and Exchange Commission (SEC), and the Stock Exchange of Thailand (SET).

Policy on Investment and Supervision of Operations in Subsidiaries and Associates

Definitions:

Subsidiary refers to:

- (a) A limited company or public limited company over which the Company has control;
- (b) A limited company or public limited company controlled by a subsidiary mentioned in (a);
- (c) A limited company or public limited company that is controlled consecutively through the chain of control starting from a subsidiary in (b).

Associate refers to:

- (a) A company in which the Company or its subsidiaries hold, in aggregate, 20% to 50% of the total voting shares;
- (b) A company in which the Company or its subsidiaries have significant influence over financial and operational policies but do not have control, and it is not considered a subsidiary or joint venture. The shareholding percentage also includes shares held by related parties.

Investment in Subsidiaries means investments in companies over which the Company has the authority to control their financial and operational policies.

Investment in Associates means investments in companies in which the group has significant influence to participate in decisions regarding financial and operational policies, but not to the extent of having control.

Operational Supervision refers to the processes used to prevent non-compliance with relevant regulations, reduce potential impacts arising from non-compliance, and ensure conformance through supporting, monitoring, evaluating, and reporting mechanisms. These include consolidating applicable regulations, risk assessments, training, communications, raising awareness, and resource allocation.

7.1 Investment Policy in Subsidiaries and Associates

The Company has a policy to invest in businesses that align with its objectives, vision, and strategic growth plans, which will increase its performance or profitability. The Company may also invest in businesses that create synergy with its core operations to enhance its competitive advantage and to support its goal of becoming a leading operator in its core industries.

In addition, the Company, its subsidiaries, and/or its associates may consider investing in other businesses that demonstrate growth potential, allow business expansion, or benefit the Company's overall group. Such investments must yield appropriate returns. The Company shall assess investment feasibility and evaluate both the potential and risk factors involved, using appropriate investment analysis processes. These investments must be approved by the Management Committee, the Board of Directors, or the Shareholders' Meeting, as the case may be.

The investment approval process must comply with relevant regulations issued by the Capital Market Supervisory Board and the Stock Exchange of Thailand. Investment decisions will be based on criteria such as investment proportion, expected returns, associated risks, and the Company's financial position. Approval shall follow corporate governance procedures and regulatory frameworks regarding asset acquisition/disposition, related-party transactions, and disclosure requirements.

7.2 Policy on the Supervision of Operations in Subsidiaries and Associates

The Company has established a policy to govern and manage its subsidiaries and associates, both directly and indirectly. The objective is to ensure that subsidiaries and associates operate in accordance with the Company's policies, as well as applicable laws, including the Public Limited Companies Act, the Civil and Commercial Code, the Securities and Exchange Act, and relevant notifications and rules of the Securities and Exchange Commission (SEC) and the Stock Exchange of Thailand (SET).

This is to safeguard the Company's investment interests. Key supervisory measures include the following:

1. Appointment of Directors or Executives in Subsidiaries and Associates

1.1 Number of Directors or Executives

The number of persons appointed as directors or executives in subsidiaries and associates must be proportionate to the Company's shareholding, unless otherwise approved by the Board of Directors if the proposed structure does not affect the Company's control over key decisions or has an appropriate balance of power.

1.2 Appointment Process

- (a) Appointed individuals must be Company executives at the level of Division Director or above.
- (b) The appointment must be approved by the Managing Director.
- (c) The appointment must also be approved by the Board of Directors of the subsidiary or associate company.

Appointed individuals must possess the qualifications, roles, responsibilities, and reliability required under applicable laws and SEC regulations.

2. Duties and Responsibilities of Appointed Directors or Executives

2.1 Supervise subsidiaries and associates to ensure compliance with applicable laws, regulations, rules, and internal policies; promote good governance; adhere to corporate governance principles, the Code of Conduct, the Company's Anti-Corruption Policy, and other relevant policies of the Company.

- 2.2 Provide guidance in setting strategic direction, policies, and business plans of the subsidiaries to align with the overall direction of the Company.
- 2.3 Oversee business operations of subsidiaries to ensure efficiency and manage returns on investment appropriately.
- 2.4 Consider and vote in the board meetings of subsidiaries and associates on matters related to normal operations, as deemed appropriate by the directors and executives of those subsidiaries and associates, without the need for prior approval from the Company's Board of Directors, provided that such decisions are in the best interests of the subsidiary or associate. The impact on the Company as a shareholder shall also be reasonably considered.
- 2.5 Report and disclose financial performance and operational data accurately and completely in accordance with the same standards as the Company. Ensure that subsidiaries submit quarterly financial statements reviewed by licensed auditors and provide supporting data for the Company's consolidated financial reports or performance statements in a timely manner. Subsidiaries and/or associates are also responsible for reporting any significant financial issues to the Company when discovered or upon request for verification.

3. Matters Requiring Approval from the Company's Board of Directors and/or Shareholders Before Proceeding

- 3.1 Matters that require approval from the Company's Board of Directors before execution.
- 3.2 Capital increase through issuance of new shares in subsidiaries and allocation of such shares in a manner inconsistent with the existing shareholding proportion of shareholders, including any reduction of registered and/or paid-up capital that deviates from the current shareholding ratio.
- 3.3 Amendments to the Articles of Association of a subsidiary.
- 3.4 Entry into transactions by a subsidiary with related parties of the Company or transactions involving acquisition or disposal of significant assets of the subsidiary, including:
 - Waiving or transferring significant benefits or claims that may lead to material damage to the subsidiary.
 - Sale or transfer of all or a material part of the subsidiary's business to a party outside the Company's group.
 - Acquisition or acceptance of a business from an external company into the subsidiary.
 - Entering, amending, or terminating contracts for leasing all or part of the subsidiary's business on a significant scale, assigning management to another party, or merging with another business within the Company group.
- 3.5 Borrowing or lending money, providing guarantees, entering into financial obligations that increase the subsidiary's liabilities, or providing significant financial assistance to third parties not related to normal business operations, except for intercompany loans within the Company group.
- 3.6 Dissolution or termination of the subsidiary's business.
- 3.7 Any transaction that is not considered normal business activity and may have a material impact on the Company.
- 3.8 Matters requiring approval from the Company's Shareholders' Meeting, including:
 - 1) Amendments to the Articles of Association of a subsidiary that may significantly impact its financial status or performance.

- 2) Entry into transactions with related parties of the Company or transactions involving acquisition or disposal of significant assets.
- 3) Capital increase, share allocation, or capital reduction in a manner inconsistent with the original shareholding ratio, or any action that reduces the Company's holding below the level required by law to maintain control of the subsidiary.
- 4) Dissolution or termination of the subsidiary's business.
- 5) Any other transaction outside the ordinary course of business that could have a material impact on the Company.

4. Disclosure of Information by Subsidiaries

4.1 Subsidiaries must disclose financial and operational information accurately and completely, using the same standards as those applied by the Company.

4.2 Disclose information on related-party transactions and asset acquisition or disposal transactions in accordance with the notifications of the Capital Market Supervisory Board and the Securities and Exchange Commission of Thailand.

4.3 Directors and executives of subsidiaries, including persons related to such directors and executives, have a duty to inform the subsidiary's board of directors of any relationships or transactions with the subsidiary that may give rise to a conflict of interest and must avoid entering into any transaction that may cause such a conflict. The subsidiary's board must then report such matters to the Company.

In this regard, directors and executives of subsidiaries must not participate in the approval of any matter in which they have a vested interest or conflict of interest.

4.4 Subsidiaries must report their business plans, investment projects, and joint investments with other operators to the Company through their monthly operational performance reports.

4.5 Subsidiaries must explain and/or provide related information or documents to the Company when reasonably requested or when the Company detects issues of material significance.

4.6 The Company's directors must ensure that subsidiaries implement appropriate and sufficient internal control systems. These systems must be regularly reviewed. The Company's internal auditors shall have direct access to relevant information and report their findings to the Company's Board of Directors, Audit Committee, and management to ensure ongoing compliance with established internal control systems.

5. Use of Inside Information by Subsidiaries

Directors, executive directors, executives, employees, staff, or designees of subsidiaries and associates – including their spouses and minor children – are strictly prohibited from using inside information of the Company, its subsidiaries, or associates, obtained through their official duties or by any other means, that could have a material impact on the price of the Company's securities, for personal or others' benefit, whether directly or indirectly, and regardless of whether any benefit or compensation is received.

Here is the English translation of Chapter 3: Business Ethics Governance for your document:

Chapter 3: Business Ethics Governance

1. Compliance and Review of the Business Code of Conduct

- 1) The Company shall ensure that the Business Code of Conduct is communicated to all directors, executives, and employees to ensure their awareness and understanding.
- 2) All directors, executives, and employees are responsible for acknowledging, understanding, and strictly complying with the Business Code of Conduct. In cases of doubt regarding the interpretation or application of the Code, they should consult their immediate supervisor or the relevant department, such as the Human Resources Department.
- 3) All levels of management are expected to act as role models in adhering to the Business Code of Conduct and are responsible for overseeing and promoting understanding and compliance among their subordinates in a serious and consistent manner.
- 4) Upon witnessing any actions that constitute a breach or violation of the Business Code of Conduct, directors, executives, and employees must report such matters to their direct supervisor or the responsible person/unit, or through the Company's whistleblowing or complaint channels. They must also cooperate fully in the investigation process. The Company has measures in place to protect whistleblowers and complainants by keeping their identity confidential and conducting investigations swiftly and fairly.
- 5) The Company shall regularly review and update the Business Code of Conduct to ensure it remains current and appropriate to the evolving business environment.

2. Disciplinary Actions for Violations and Non-Compliance with the Business Code of Conduct

All directors, executives, and employees are obligated to comply with and encourage others to comply with the Code of Conduct. The following actions are considered violations of the Code:

- 1) Non-compliance with the Code of Conduct.
- 2) Encouraging or supporting others to violate the Code of Conduct.
- 3) Neglecting or ignoring violations of the Code of Conduct in cases where the individual knew or should have known of such violations, particularly those related to their areas of responsibility.
- 4) Failure to cooperate with or obstructing investigations into alleged violations of the Code of Conduct.
- 5) Acting unfairly against whistleblowers who report violations of the Code.

The Company considers the Code of Conduct as part of its disciplinary regulations, which all directors, executives, and employees must strictly observe. Violations of or non-compliance with the Business Code of Conduct will result in disciplinary action. Additionally, if the conduct violates the law, legal proceedings may also be initiated.

Approved by the Board of Directors

At the Board of Directors Meeting No. 4/2025 On August 11, 2025