



Code of Conduct

Srisawad Capital 1969 Public Company Limited

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## Code of Conduct

This Employee Code of Business Conduct applies to all employees of Srisawad Capital 1969 Public Company Limited and its subsidiaries, including permanent employees, temporary staff, special contract employees, and others. Every employee hired by the Company has a duty to comply with this Code of Conduct, which serves as the primary standard to prevent any conduct that violates the Company's ethics. Accordingly, these core principles of business conduct have been established for collective adherence as follows:

### 1. Code of Conduct for the Board of Directors

The Company's directors are committed to upholding the highest ethical standards for the benefit of shareholders and other stakeholders. Directors shall operate under the following principles:

#### 1.1 Integrity, Fairness, and Upholding High Moral Standards

1.1.1 In managing the Company's affairs, directors shall act with honesty, integrity, fairness, and morality.

1.1.2 Directors shall not discriminate based on race, religion, gender, marital status, or physical disability.

1.1.3 Directors shall not make promises or commitments regarding matters that the Company does not intend to or is unable to fulfill.

1.1.4 All actions taken by directors must be conducted with honesty.

1.1.5 Directors shall adhere to the truth and avoid creating misunderstandings, whether directly or indirectly. They shall not make false statements or engage in deceptive acts and shall not cause misunderstandings by omitting facts.

#### 1.2 Personal Transactions

1.2.1 Personal transactions or other business activities of a director must be kept strictly separate from the Company's operations conducted in their capacity as a director.

1.2.2 Directors shall not use the Company's name for personal transactions or other business purposes.

1.2.3 Directors shall use the products and services offered by the Company only under the terms and conditions specified by the Company.

#### 1.3 Confidentiality

1.3.1 Directors shall not disclose confidential information regarding customers, employees, or the Company's operations whether intentionally or unintentionally to third parties, except with the Company's prior consent.

1.3.2 Directors shall not use information obtained through their directorship for personal financial gain, nor shall they use such information for the financial benefit of others.

#### 1.4 Disclosure of Interests

1.4.1 Directors must promptly disclose interests in personal or other businesses, including any matters that constitute or may lead to a conflict of interest, in accordance with the policies prescribed for directors.

1.4.2 Directors must disclose any relationships they have with the Company in accordance with the independence policies prescribed for directors.

1.4.3 Any transactions between a director and the Company must be conducted **at arm's length** to avoid actual or perceived conflicts of interest.

#### 1.5 Compliance with Laws

1.5.1 Directors shall comply with all laws, rules, and regulations relevant to the Company's business operations.

#### 1.6 Acceptance of Money, Gifts, Entertainment, and Travel

1.6.1 Directors must not use their position to seek personal benefits from those doing business with the Company or those seeking to do business with the Company.

1.6.2 In the event that benefits are offered, directors must not accept personal benefits in an amount that exceeds what is considered appropriate.

### 2. Code of Conduct for Employees

2.1 The Company is committed to operating under its Six Corporate Core Values as follows:

2.1.1 **Integrity:** The company and employees at all levels uphold honesty, moral principles, and transparency.

2.1.2 **Customer First:** The company prioritizes service excellence, ensuring accuracy and consistent compliance with the terms and conditions provided to customers.

2.1.3 **Teamwork:** The company values the contribution of all parties and recognizes that working together fosters unity and creates benefits for employees, the company, and customers.

2.1.4 **Innovation:** The company emphasizes product development to ensure relevance and suitability for customers and business partners. Creativity must generate value and lead to superior services for customers.

2.1.5 **Fast to Change:** The company maintains readiness for changes in financial products and services to keep pace with rapid shifts across all channels, ensuring customers always receive timely service.

**2.1.6 Return to Shareholders:** The company is committed to generating profits, not only to reward shareholders but also to build a strong and sustainable organization, ensuring the well-being of employees and their families who dedicatedly serve the organization with integrity.

**2.2 All directors, executives, and employees are committed to implementing and adhering to the following 10 Principles:**

**2.2.1 Customers:** The company aims to provide customers with appropriate benefits and satisfaction by offering high-quality products and services fairly, while strictly maintaining the confidentiality of customer information.

**2.2.2 Shareholders:** The company strives to provide shareholders with appropriate returns by consistently delivering excellent performance, supported by effective internal control, audit, and risk management systems.

**2.2.3 Employees:** The company recruits and retains high-performing individuals, commits to continuous employee development, and promotes opportunities for career advancement and stability.

**2.2.4 Business Partners and Competitors:** The company treats business partners and competitors fairly and maintains confidentiality in accordance with relevant rules and laws. The company shall not seek information regarding business partners or competitors through dishonest or unfair means.

**2.2.5 Creditors and Suppliers:** The company upholds integrity in complying with all terms and conditions agreed upon with all types of creditors and suppliers, in accordance with applicable rules and legal requirements.

**2.2.6 Society:** The company is committed to conducting business with social responsibility and exercises caution in any actions that may impact **public interest**. Furthermore, the company consistently pursues and supports activities that benefit the community and society as a whole.

**2.2.7 Environment:** The company strives to comply with environmental laws and regulations, effectively managing safety and environmental standards to prevent any adverse impacts on nearby communities. We also promote environmental awareness and responsibility among our employees.

**2.2.8 Conflict of Interest:** The company maintains oversight and prevention measures regarding potential conflicts of interest, connected transactions, or inappropriate inter-company transactions. We establish policies, procedures, and approval processes, ensuring that disclosure and approval of connected transactions strictly comply with the regulations of relevant governing bodies.

**2.2.9 Information Disclosure:** The company aims to disclose information to shareholders, investors, and the general public accurately, completely, transparently, and in a timely manner, in accordance with all relevant laws and regulations.

**2.2.10 Corporate Governance:** The company is committed to adhering to the Principles of Good Corporate Governance as prescribed by the regulatory authorities governing the company as both a financial institution and a listed company. We aim to build stakeholder confidence by developing our corporate governance practices toward international standards.

### 2.3 The Eight Primary Codes of Conduct Specified by the Company:

**2.3.1 Integrity:** We are committed to doing what is right and performing our duties with honesty, integrity, and transparency under the law and company regulations. We adhere to this core code in every activity and decision-making process. We conduct our business with integrity, while remaining mindful of risks that may impact on the organization.

**2.3.2 Trust:** We respect our colleagues, customers, shareholders, and government officials, treating them in the same manner we wish to be treated. We believe that everyone will dedicate their full abilities and perform their duties to the best of their potential based on mutual trust.

**2.3.3 Confidentiality:** We are committed to protecting the confidential information of the Company's customers and business partners. We uphold the trust they have placed in us by ensuring that information related to their business activities remains confidential. We strive to handle information received from each customer and partner with the same level of care as they would themselves, thereby fostering trust in the Company.

**2.3.4 Professionalism:** We perform our duties with the necessary skills, qualifications, and knowledge required to execute our work with expertise and consistent professional standards.

**2.3.5 People:** We recruit individuals with skills and experience that align with the Company's needs. We prioritize promotions and compensation based on performance. We treat our colleagues with the belief and faith that everyone is the Company's most valuable asset, both now and in the future.

**2.3.6 Leadership:** We strive to be leaders in all significant areas and exercise leadership to drive the Company's operations toward achieving its goals. The Company has established a clear vision, focusing on empowering employees to fulfill leadership objectives and strategies. This includes developing employees' professional capabilities to support the Company's strategy and removing any obstacles to their development.

**2.3.7 Ownership:** We share a collective responsibility to drive the Company toward its goals and to improve operational systems for maximum effectiveness. We manage the Company's assets as if they were our own and always prioritize the Company's long-term success.

**2.3.8 Compliance:** We expect all employees to adhere strictly to laws, regulations, and relevant requirements in all business decisions and operations. Furthermore, employees must conduct themselves within the framework of good moral principles.

### 3. Observance of Laws and Policies

The Company's operations must be conducted under the provisions of national laws while maintaining good relationships with government officials. Compliance with laws, rules, and regulations is considered the core heart of our business operations.

#### 4. The Company sets the highest standards in business operations as follows:

4.1 Every employee must strictly comply with the law and Company regulations.

4.2 Violating national laws, regulations, or Company rules under the pretext of increasing Company profits is not an acceptable or justifiable excuse.

4.3 The Company is not obligated to accept or follow the practices of competitors or other financial institutions. The Company will not engage in any unlawful acts by claiming that certain laws or official regulations no longer appear to be in effect, or by citing that competitors are also failing to comply with such laws or regulations.

4.4 The Company intends to foster good relationships with financial regulatory bodies to build mutual trust and confidence. This is achieved through open communication and cooperation, ensuring that regulatory organizations are kept informed of the Company's business operations with transparency.

### 5. Relations with Customers

The Company's success is built on the foundation of customer satisfaction. Therefore, the Company must establish good relationships with customers based on honesty, integrity, ethics, and mutual trust. We recognize that customers have diverse needs and expectations. The Company is committed to responding to these varied needs by continuously and appropriately developing its products and services to meet international standards, as follows:

**5.1 Authorized Services:** We will only offer products and services for which the Company is authorized and possesses specific expertise.

**5.2 Transparency in Advice:** In providing advice to customers regarding terms, conditions, benefits, and service obligations, we will present all information clearly, truthfully, and with transparency and fairness.

**5.3 Prohibition of Deceptive Advertising:** False or misleading advertising that deceives customers is strictly prohibited.

**5.4 Fair Terms of Invitation:** Inviting customers to use the Company's services must not involve unfair or non-transparent conditions tied to other services the customer currently has or may have with the

Company in the future. The terms and conditions shall depend solely on the mutual agreement to use the specific service as advertised.

## 6. Relations with Communities

The Company and its employees must adhere to being good citizens. We must exercise social responsibility by utilizing resources—including capital, personnel, and energy. The Company is pleased to participate in social activities by providing financial support for initiatives that offer public benefits.

## 7. Relations with Employees

The Company maintains a fundamental policy that requires all employees to treat their colleagues with respect, honoring their dignity, honor, and individual rights. The Company will collect and maintain personal employee records only as necessary for effective operations or as required by law. All such information will be kept strictly confidential, and disclosure will be made only to parties legally entitled to know for necessary purposes.

The Company strives to provide a work environment that is safe, hygienic, and conducive to productivity. Each employee bears a responsibility toward their colleagues and the Company to refrain from conduct that degrades the work environment. The Company expects every employee to support its commitment to Equal Employment Opportunity.

We recognize that the Company's primary strength stems from the collective cooperation of employees, blending diverse experiences toward shared goals. The Company strictly prohibits any form of discrimination, labor exclusion, harassment, or intimidation based on differences in race, color, religion, gender, age, nationality, citizenship, sexual orientation, or disability. Employees are encouraged to consult their supervisors if they have any questions regarding these policies. The Company will strictly enforce disciplinary actions in the event of any policy violations.

## 8. Advertising and Promotion Policies

The Company upholds integrity as a fundamental principle of our operations. Therefore, to motivate and enhance customer confidence in the Company's services and products, deceptive advertising and ambiguous sales promotion activities are strictly prohibited. The Company adheres to fair trade business standards in all aspects, including advertising and public relations planning, media selection and usage, as well as sales promotion strategies.

The success of the Company's services and products is built on the foundation of quality, performance, and the Company's reputation—not on the dissemination of false or misleading information.

## 9. Confidentiality

The Company has a responsibility to maintain the trust placed in us by our customers and business partners by keeping their information confidential at all times. This obligation covers information obtained from

the specific departments handling the customer's (or partner's) business, as well as from other internal sources. Such information must be used strictly for its intended purposes and must never be used for the personal benefit of any individual.

The Company is committed to protecting the privacy of customers and partner data. Employees at all levels have a duty to safeguard this confidential information and must not disclose it to third parties, except in the following circumstances:

**9.1 Written Consent:** Obtain prior written permission from the customer to disclose the information.

**9.2 Legal Mandate:** Disclosure is required by law.

**9.3 Regulatory Requirement:** The Company has an obligation prescribed by regulatory bodies to disclose information to the public.

**9.4 Protection of Company Assets:** Disclosure is necessary to protect the Company's property, for example, reporting information to the police in cases of suspected fraud or embezzlement.

**9.5 Post-Employment Obligations:** Employees have a permanent obligation to protect confidential information about customers, business partners, and the Company, even after their resignation or termination of employment. All information or documents created by employees during their tenure remain the property of the Company. Employees must not disclose such information or documents after they have left the Company.

## 10. Integrity and Accuracy of Records

The Company's business records must be prepared based on accurate and reliable reports for submission to executives, shareholders, customers, government agencies, and other entities. Therefore, all information related to the Company's business must be precise, truthful, and complete in substance without any limitations.

Accuracy refers to both the correctness of written documentation and ethical integrity. Under this Code of Conduct, the Company prohibits any concealed financial transactions, the use of pseudonyms, or conducting transactions through third-party accounts. Employees are responsible for recording and maintaining data with honesty, in accordance with the intended purpose, and based on facts. Any duty that constitutes an illegal or unethical act due to a lack of awareness cannot be used as an excuse for inaccurate or distorted Company records.

## 11. Conflicts of Interest

Personal relationships can develop between individuals over time, and such relationships may create issues affecting impartiality, commonly referred to as a "Conflict of Interest." Proper management procedures must be implemented to prevent these relationships from causing issues for the Company or the parties involved.

Accordingly, employees at the level of **Assistant Vice President (AVP) and above** are required to complete and submit a **"Conflict of Interest" Declaration Form** to the Human Resources Department to demonstrate transparency and prevent potential conflicts of interest. It is the employee's duty to update and submit this form **annually**. Failure to comply may result in disciplinary action. Furthermore, the Company shall maintain oversight through regular random audits.

#### 11.1 Examples of "Conflict of Interest" Situations

Conflicts of interest involving customers can be illustrated through various situations where the Company, an employee, or a third party:

- **Financial Gain or Loss Avoidance:** Likely to make an inappropriate financial gain or avoid a financial loss at the expense of a customer.
- **Preferential Treatment:** Receives compensation or other incentives to favor the interests of a particular customer over others.
- **Distinct Interests in Outcomes:** Derives benefit from providing services to a customer or conducting transactions on their behalf that are distinct from the customer's own interests in that outcome.
- **Third-Party Inducements:** Receives offers in the form of cash, goods, or services from someone other than the customer, which go beyond standard fees or expected compensation.
- **Suboptimal Recommendations:** Receives compensation or incentives to sell products or services that do not result in the maximum benefit for the customer.
- **Personal Payment to Achieve Targets:** A sales employee uses personal funds to make payments on behalf of a customer to reach sales targets. This may lead to inappropriate transactions, as it hinders the Company's ability to assess the customer's debt-repayment capacity, distorts information, and creates an undue personal burden on the salesperson.

#### 11.2 Examples of "Conflict of Interest" Situations Related to the Company:

A conflict of interest related to the Company may be described by situations where:

- **Improper Use of Position:** An employee (including their family members) receives significant financial or other benefits as a result of improperly using their position within the Company.
- **Self-Serving Decisions:** An employee makes a decision or takes any action within the Company that benefits themselves, their family members, or close associates.
- **Impaired Impartiality:** Financial or other interests, or relationships with any person, prevent an employee from making decisions or performing their duties and responsibilities with impartiality.
- **Outside Roles with Competitors or Vendors:** An employee serves as a board member, shareholder, executive, temporary employee, or contractor for an organization that sells goods or services to the Company, or for a competitor of the Company.

- **Procurement Involving Associates:** An employee is involved in procurement decisions concerning their relatives or close associates as vendors or contractors.
- **Related Party Transactions:** Transactions or operations occur between the Company and its major shareholders, or between companies within the group or Srisawad Capital 1969 Public Company Limited and its subsidiaries, due to the close relationships of such groups.
- **Ownership in Conflicting Entities:** An employee or their family members (including spouse, children, and parents) are owners or partners in an organization that is a competitor, vendor, or customer of the Company.
- **Nepotism and Special Privileges:** Granting special privileges to employees who are relatives of executives, such as offering or providing a higher salary than other employees in the same position.

## 12. Bribes and Inducements

Employees are strictly prohibited from giving or receiving bribes and inducements in any form and are forbidden from authorizing others to give or receive bribes and inducements on their behalf. Bribery in business conduct is illegal and constitutes a criminal offense. The Company operates using fair competition strategies, prioritizing the high quality of its products and services as its primary selling point.

The Company does not permit customers (or business partners) to provide money or items as bribes to Company employees. Employees are strictly prohibited from accepting bribes, money, gifts, or any other form of benefit as an inducement for the Company's business operations. The Company and its management firmly believe in and promote Good Corporate Governance, conducting business fairly and transparently in accordance with the law. Therefore, providing bribes or anything of value, whether directly or indirectly, to government officials or politicians to influence their discretion in a way that favors the Company is strictly prohibited.

## 13. Political Contributions and Activities

- **The Company's fundamental policy** states that Company funds or resources shall not be used to provide political support to any political candidates or parties anywhere in the world.
- **An exception is made** only when such support is legally permitted and serves to support democracy as a whole.
- **The Company's policy prohibits** employees from using Company facilities or resources for political campaigning, political fundraising, or for the specific purposes of any political party.
- **The Company strictly forbids** supervisors and employees at all levels from commanding or influencing employees and subordinates by any means, to participate in any type of political activity.

- An employee's decision to engage in political activities by dedicating personal time outside of working hours or using their own funds and personal assets for political campaigns or activities, shall be considered a strictly personal decision made by that employee.

#### 14. Gifts and Benefits

To maintain the Company's long-standing reputation for conducting business with integrity, honesty, and legal compliance, the Company has established policies regarding the acceptance of gifts, entertainment, and rewards as follows:

- **Prohibition of Solicitation and Acceptance:** Directors and employees are prohibited from accepting or soliciting gifts, such as financial sponsorship, entertainment, travel, hospitality, services, or any other rewards from individuals or entities doing business with the Company. Such actions may lead to inappropriate concessions in business agreements made on behalf of the Company.
- **Token Gifts:** Employees may accept gifts of nominal value, such as pens, notebooks, or calendars.
- **Customary Gifts and Benefits:** The acceptance of gifts, souvenirs, or other benefits according to local customs\* or business etiquette is permissible, provided it does not violate relevant laws or local traditions. The value must not exceed **3,000 Baht per person per occasion**, in accordance with the notification of the **National Anti-Corruption Commission (NACC)**. Such gifts should be presented in a manner that enhances the Company's corporate image.
- **Gifts Exceeding Threshold:** In cases where the giving of gifts, souvenirs, or other benefits according to custom or business etiquette exceeds a value of **3,000 Baht**, the employee must notify their **Line Manager, Legal Department, or Compliance Department** for consideration and approval as appropriate.
- **Corporate Representation and Documentation:** Gifts must be explicitly addressed in the Company's name and supported by verifiable documentation.

*(Note: "Customary gifts and benefits" refers to festivals or significant events when gifts are traditionally exchanged. This also includes occasions for expressing congratulations, gratitude, hospitality, condolences, or providing assistance in accordance with social etiquette. Reference: Regulations of the Office of the Prime Minister on the Giving or Receiving of Gifts by Government Officials, B.E. 2544 (2001)).*

- **Perishable Gifts:** For gifts, souvenirs, or other benefits in the form of consumables with an expiration date and a value not exceeding 3,000 Baht, management of such items shall be at the discretion of the supervisor or the department receiving the gift.
- **Promotional Materials:** Employees are permitted to accept gifts, souvenirs, or other benefits in the form of calendars or diaries used as the Company's promotional media for personal use.

- **Inter-Organizational Gifts:** The acceptance of gifts, souvenirs, or other benefits on an inter-organizational basis such as during the signing of a business contract is permissible. However, such gifts and souvenirs shall be considered the property of the Company
- **Unavoidable Acceptance:** In cases where a third party offers a gift or benefit to a director or employee that requires prior approval, but the situation makes it impossible to decline at that moment (e.g., during a business meeting with a customer), the director or employee may accept the gift or benefit temporarily. However, they must report it to the Compliance Department, their supervisor, or other authorized people as soon as possible. Such gifts shall not be considered the personal property of that director or employee, and they must be able to provide a justifiable reason for accepting them.
- **Business Hospitality and Entertainment:** Regarding other benefits such as business entertainment, directors and employees must ensure that such hospitality is not excessive in cost or frequency, to the extent that it creates an obligation whether direct or indirect to the host. The Compliance Department, supervisors, or other authorized people shall maintain records of any such gifts or benefits received. The giving or receiving of gifts and any other benefits to induce the recipient to agree to any action that creates a conflict of interest in performing duties toward customers is strictly prohibited.

## 15. Anti-Unfair Competition Policy

The Company is committed to good corporate governance and rigorous oversight. We value our business partners and treat them with equity, based on the principles of fair, transparent, and equal competition.

**15.1 Competition Ethics:** The Company conducts business with competitors within the framework of fair competition. We do not seek confidential information from competitors through dishonest or inappropriate means, nor do we damage their reputation through malicious allegations.

**15.2 Procurement Standards:** For business partners and suppliers, the Company conducts procurement to achieve the best results for the Company and meet all requirements regarding quality, price, quantity, service time, and speed. We provide accurate, clear, and complete information to all partners through transparent methods, ensuring equal opportunities and fair competition for every party.

## 16. Occupational Health, Safety, and Working Environment Measures

The Company prioritizes the occupational health, safety, and working environment of its employees and promotes a safe and positive workplace. We ensure appropriate working conditions, encourage the efficient use of resources, and aim to reduce unnecessary resource consumption that may impact the environment.

**16.1 Loss Prevention and Control:** The Company will take all necessary measures to control and prevent losses in various forms resulting from accidents, fires, work-related injuries or illnesses, loss

or damage of property, security breaches, improper work practices, and various errors. We are committed to maintaining a work environment that is safe for all personnel.

**16.2 Resource and Equipment Management:** The Company provides workspaces, furniture, stationery, office supplies, and Information Technology (IT) resources to facilitate employee productivity. Employees are responsible for managing these resources, using equipment with care, and ensuring they are not lost, damaged, or used for any illegal purposes.

**16.3 Commitment to Sustainability:** The Company is dedicated to social responsibility regarding quality, occupational health, safety, and the environment in a serious and continuous manner. We strive to maximize the utility of natural resources, recognizing the importance of environmental preservation and the safety of all involved stakeholders. Furthermore, we support social activities that protect the environment and improve the quality of life in the community based on sustainable development principles.

## 17. Training and Dissemination of Rules and Discipline

**17.1 Policy Disclosure:** The Company discloses its Business Code of Conduct policies through internal regulations, annual reports, the corporate website, and other marketing materials as appropriate, as well as through public relations activities.

**17.2 Education and Training:** The Company provides education and training on the Code of Conduct to ensure employee understanding. This training is mandatory for all new employees upon joining the Company, with annual refresher courses conducted thereafter. Employees who do not pass the assessment must undergo retraining and retake the test until a passing grade is achieved.

## 18. Whistleblowing Channels and Reporting of Employee Misconduct

**18.1 Reporting Duty:** Every employee has a duty to report any leads and/or concerns regarding violations of this Code of Conduct or serious misconduct within the Company. All reports must be made in good faith and must not involve malicious allegations or defamation. Complainants may report through the following channels. The Company will not track or investigate the identity of the whistleblower if they choose to remain anonymous.

- **Website:** <https://www.srisawadcapital.co.th/th/contact-scap>
- **By Post:**
  - **Attention:** Chief Executive Officer (CEO)
  - **Subject:** Whistleblowing Report / Anti-Corruption Grievance

- **Mailing Address:** 99/392 Srisawad Building, 1st, 5th, and 6th Floors, Soi Chaeng Wattana 10, Yaek 3 (Benjamit), Chaeng Wattana Road, Thung Song Hong Subdistrict, Lak Si District, Bangkok 10210
- **Centralized Database:** All received information will be stored in a centralized database to ensure that such leads or complaints are processed and investigated promptly to uncover the facts.

**18.2. Investigation and Cooperation:** The Company will conduct an investigation upon discovery or receipt of a report alleging dishonest behavior by an employee. All parties involved must cooperate with the investigation and provide relevant information in cases where an employee is found to have violated this Code of Conduct.

**18.3. Disciplinary Actions:** The Company takes violations of this Code of Conduct seriously. Such breaches may result in disciplinary action, which can include termination of employment. Therefore, employees must immediately report any actual or suspected violations of this Code of Conduct to the Compliance Department or their supervisor.

**18.4. Monitoring and Reporting:** The Compliance Officer is responsible for monitoring adherence to this Code of Conduct and reporting the results to the Audit Committee. This includes maintaining comprehensive records of all actual or potential breaches. The Compliance Officer is also tasked with keeping a formal register of all Code of Conduct violations.

If you have any questions regarding this policy, please contact the Compliance Department or the Legal Department during the Company's business hours.