



## Conflict of Interest Policy

Srisawad Capital 1969 Public Company Limited

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#### Objective:

The objective of this policy is to encourage executives and employees to avoid conflicts of interest and disclose such relationships to ensure ethical business operations and compliance with legal principles.

#### Definitions / Abbreviations:

**Conflict of Interest** occurs when an employee fails to disclose relationships with others and may become a stakeholder in those relationships, thereby affecting the fiduciary duty entrusted to them by the company. Furthermore, conflict of interest is considered a form of corruption and bribery.

#### Conflicts of interest can occur between:

1. The Company and one or more customers
2. Employees and customers
3. Third-party agents and customers
4. Employees and the Company
5. Employees and fellow employees
6. Major shareholders and the Company
7. The Company and the group of companies or affiliates of Srisawad Capital 1969 Public Company Limited
8. Third-party agents and the Company
9. The Company and vendors/dealers/partners

#### Policy Scope:

This policy applies to all employees of Srisawad Capital 1969 Public Company Limited and its subsidiaries.

#### Policy Details:

Personal relationships can occur between two individuals at any given time. Such relationships may lead to issues affecting impartiality, known as conflicts of interest. Therefore, appropriate management procedures must be in place to prevent these relationships from causing problems for the Company or the individuals involved.

Accordingly, employees at the level of Assistant Vice President (AVP) and above must complete the **Conflict of Interest Declaration Form** and submit it to the Human Resources Department to demonstrate transparency and prevent potential conflicts of interest. Employees are responsible for recording and submitting this form annually. Failure to comply may result in disciplinary action. Additionally, the Company shall provide oversight through random audits on a regular basis.

#### Roles and Responsibilities:

- **All Employees:** Must perform their duties with a **duty of loyalty** for the maximum benefit of the Company. They must not use their positions to make decisions or take any actions that prioritize personal gain over the Company's interests.
- **Executives:** Are responsible for overseeing the effectiveness of internal controls to prevent and detect existing or potential conflicts of interest. Furthermore, they should support the review and audit of operations with impartiality, as necessary.
- **Compliance Department:** Is primarily responsible for disseminating and communicating the core content of this policy to relevant parties. This includes supporting and assisting the Company in preventing, detecting, and identifying issues related to regulatory compliance concerning conflicts of interest.
- **Internal Audit Department:** Must evaluate, design, and maintain robust controls to prevent, detect, and establish response measures for potential conflicts of interest. Additionally, they must monitor and regularly review the effectiveness of internal controls.

#### Examples of Conflict of Interest Situations:

Conflicts of interest involving customers can be described through various scenarios where the Company, employees, or third parties:

1. May improperly generate profits or avoid losses at the customer's expense.
2. Receive compensation or other incentives to prioritize the interests of one customer over others.
3. Benefit from providing services to customers or performing transactions on their behalf beyond what the customer is entitled to receive.
4. Receive offers in the form of cash, goods, or services from parties other than the customer, in addition to their standard remuneration.
5. Receive compensation or other incentives for selling products/services that do not serve the customer's best interests.
6. Sales staff use personal funds to make payments on behalf of customers to meet sales targets. (This may lead to improper transactions as it prevents the Company from accurately assessing the customer's debt-repayment capacity, distorts data, and creates an unnecessary burden on the sales staff).

Conflicts of interest related to the Company can be described by situations where:

1. **Employees (including family members)** receive significant financial or other benefits as a result of misusing their positions within the Company.
2. **Employees** make decisions or take any actions within the Company that favor themselves, family members, or close associates.
3. **Financial or other benefits**, or relationships with any individual, impair an employee's ability to make decisions or perform their duties and responsibilities with impartiality.
4. An individual 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.
5. **Procurement decisions** are made involving relatives or close associates of an employee to act as vendors or contractors.

6. **Transactions or operations** occur between the Company and major shareholders, or between the group of companies or affiliates of **Srisawad Capital 1969**, due to the close relationships of such groups.
7. **Employees or family members** (namely spouses, children, and parents) are owners or partners in organizations that are competitors, vendors, or customers of the Company.
8. **Preferential treatment** is given to employees who are relatives of executives (e.g., offering or providing a higher salary than other employees in the same position).

**Disciplinary Actions:**

Any executive or employee who acts willfully, with negligence, or fails to comply with the requirements set forth in this policy shall be deemed to have committed a disciplinary offense and will be subject to disciplinary action on a case-by-case basis.

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

This policy was approved by the **Chief Executive Officer** and is effective from **February 1, 2023**.

This policy shall be reviewed and updated at least once a year.

**Related Internal Documents:**

- Conflict of Interest Declaration Form



บริษัท ศรีสวัสดิ์ แคปปิตอล 1969 จำกัด (มหาชน)  
99/392 อาคารศรีสวัสดิ์ ชั้น 1,5,6  
ซอยแจ้งวัฒนะ 10 แยก 3 (เบญจมิตร)  
ถนนแจ้งวัฒนะ แขวงทุ่งสองห้อง เขตหลักสี่  
กรุงเทพมหานคร 10210  
เลขประจำตัวผู้เสียภาษี 0107536000722

## Conflict of Interest Declaration Form

To: Human Resources Department

Name \_\_\_\_\_ Position: \_\_\_\_\_

Business Group: \_\_\_\_\_ Department: \_\_\_\_\_

I and my family members hereby certify that we have no involvement, direct or indirect interests, or any benefits that may lead to a conflict of interest with the Company, any customer(s), employees and customers, third-party agents and customers, employees and the Company, fellow employees, major shareholders and the Company, the Company and its group of companies or affiliates of Srisawad Capital 1969 Public Company Limited, third-party agents and the Company, or the Company vendors/dealers/partners.

I commit to maintaining impartiality in all such dealings, performing my duties with integrity and transparency, and being subject to audit by relevant parties at any time, prioritizing the collective interest primarily.

Should any conflict of interest arise between myself and the Company, any customer(s), employees and customers, third-party agents and customers, employees and the Company, fellow employees, major shareholders and the Company, the Company and its group of companies or affiliates of Srisawad Capital 1969 Public Company Limited, third-party agents and the Company, or the Company and vendors/dealers/partners, I hereby agree to be subject to the regulations and disciplinary procedures of Srisawad Capital 1969 Public Company Limited.

\_\_\_\_\_ (Signature)

(\_\_\_\_\_)

Date: \_\_\_\_ / \_\_\_\_ / \_\_\_\_