





Code of Conduct

Srisawad Capital 1969 Public Company Limited

	Reference No.	EXEC-2026/001	Edition	1 <sup>st</sup> Revised
	Policy Name.	Code of Conduct		
	For	Directors, Executives and Employees		

## Index

	Page
<b>1. Introduction</b>	2
1.1 Objectives of the Code of Conduct	2
1.2 Scope	2
1.3 Vision and Mission	2
<b>2. Guidelines for Compliance with the Code of Business Ethics</b>	3
2.1 Compliance with Company Rules, Regulations, Announcements, and Orders	3
2.2 Prohibited Conduct	4
2.3 Disciplinary Procedures	5
2.4 Handling of Insider Information	5
2.5 Conflict of Interest	7
2.6 Anti-Fraud and Anti-Corruption	7
2.7 Protection and Safeguarding of Company Assets	7
2.8 Disclosure of Information and Transparency	8
2.9 Intellectual Property and Use of Information Technology System	8
2.10 Labor Practices and Human Rights	8
2.11 Treatment of Stakeholders	9
(1) Policy and Guidelines Toward Employees	9
(2) Policy and Guidelines for Shareholders	10
(3) Policy and Guidelines for Customers	10
(4) Policy and Guidelines for Business Partners and/or Creditors	10
(5) Policy and Guidelines for Competitors	11
(6) Policy and Guidelines for Society and Communities	11
(7) Environment Policy	11
(8) Policy and Guidelines for Government Sector	12
2.12 Occupational Health, Safety, and Work Environment	12
2.13 Personal Data Protection	12
2.14 Anti-Money Laundering	13
2.15 Internal Control and Internal Audit	13
2.16 IT Security	
2.12 Occupational Health, Safety, and Work Environment	14
<b>3. Corporate Governance on Compliance with the Code of Business Ethics and Whistleblowing</b>	14

	Reference No.	EXEC-2026/001	Edition	1 <sup>st</sup> Revised
	Policy Name.	Code of Conduct		
	For	Directors, Executives and Employees		

## Code of Conduct

### 1. Introduction

Srisawad Capital 1969 Public Company Limited aims to conduct its lending business in a responsible and fair manner (“Responsible Lending”) under the principles of good governance and corporate governance. The Company has therefore prepared this Code of Conduct as a guideline for conducting business ethically and as guidance for directors, executives, and employees to follow appropriately and correctly. The Company believes that this Code of Business Ethics will be an important tool in supporting directors, executives, and employees in performing their duties effectively and efficiently, while also strengthening confidence among investors and all stakeholders.


#### 1.1 Objectives of the Code of Conduct

This Code of Conduct has been prepared in written form and disseminated both internally and through the Company's website, with the following objectives:

1. To serve as principles and guidelines for the performance of duties by directors, executives, and employees at all levels of Srisawad Capital 1969 Public Company Limited, reflecting the Company's commitment to conducting business under ethical standards, honesty, fairness, transparency, compliance with laws, and social responsibility.
2. To serve as a communication tool to ensure that personnel at all levels are aware of ethical principles, behavioral frameworks, operational guidelines, measures, and penalties for violations of ethical standards.
3. To serve as criteria for consideration and risk and impact analysis when the Company encounters ethical issues or concerns.
4. To serve as criteria for supervising, controlling, and monitoring compliance with business ethics and maintaining ethical conduct within the Company.
5. To serve as guidelines for reporting ethical violations, bribery, and corruption through secure communication channels, including whistleblower protection.

#### 1.2 Scope

This Code of Business Ethics applies to all directors, executives, and employees of Srisawad Capital 1969 Public Company Limited and its affiliated companies at all levels, regardless of whether such persons have formally acknowledged it, without exception or discrimination.

	Reference No.	EXEC-2026/001	Edition	1 <sup>st</sup> Revised
	Policy Name.	Code of Conduct		
	For	Directors, Executives and Employees		

### 1.3 Vision and Mission

#### Vision

We strive to be a sustainable growth financial institution.

#### Mission

We support the well-being of the society.

## 2. Guidelines for Compliance with the Code of Business Ethics


### Business Ethics

Srisawad Capital 1969 Public Company Limited is committed to conducting business in accordance with sound ethical principles. The Board of Directors has therefore established guidelines aligned with key principles of good corporate governance to serve as guidance for the Company's personnel, including directors, executives, and employees, to strictly adhere to. Key policies and ethical guidelines include:

#### 2.1 Compliance with Company Rules, Regulations, Announcements, and Orders

This Code of Conduct supplements other Company rules, regulations, announcements, and orders. In the event of any conflict between such rules and this Code, the provisions of this Code shall prevail. All executives must comply with Company rules, regulations, announcements, and orders issued by their superiors, including:

1. Supporting Company policies and strict compliance with rules, regulations, orders, agreements, announcements, or circulars communicated to all employees.
2. Performing duties honestly and fairly and promptly reporting any incident that may damage the Company's reputation or assets.
3. Being courteous and respectful toward colleagues.
4. Performing duties with dedication and diligence, maintaining Company governance and serving as a good example to employees.
5. Protecting Company interests and confidential information relating to the Company, customers, or business operations. Employees must maintain confidentiality during and after employment and accept responsibility for any damages caused by unauthorized disclosure or misuse.
6. Exercising due care in protecting Company assets from loss or damage and not using Company property for personal or unrelated purposes.
7. Managing operations with integrity and ethics while promoting ethical conduct across all levels and addressing conflicts of interest.
8. Supervising subordinates closely, fairly, and without bias.
9. Being willing to work as a team and listen to others' opinions.
10. Supporting and supervising compliance with Company computer systems, computer data, and traffic data usage policies in accordance with applicable computer and copyright laws.

	Reference No.	EXEC-2026/001	Edition	1 <sup>st</sup> Revised
	Policy Name.	Code of Conduct		
	For	Directors, Executives and Employees		

## 2.2 Prohibited Conduct

Executives must refrain from conduct that may damage the Company or themselves, including:

1. Using Company working hours for personal matters.
2. Engaging in business that competes with the Company.
3. Acting in a manner that damages the Company's reputation or position.
4. Providing false information or concealing material information from the Company.
5. Performing duties negligently or improperly.
6. Concealing or distorting facts to obtain personal or third-party benefits.
7. Obstructing lawful operations or instructing employees to perform unethical acts.
8. Violating civil or criminal law.
9. Disclosing salary or compensation details of oneself or others.
10. Soliciting or accepting assets or benefits from customers, vendors, partners, competitors, or other persons conducting business with the Company, except for customary gifts or normal business hospitality. Gifts exceeding THB 3,000 must be reported to a director-level supervisor.
11. Providing bribes directly or through third parties or exerting improper influence on government officials, customers, or partners.
12. Altering or falsifying records or accounting data.
13. Making payments or conducting business transactions for hidden or improper purposes.
14. Being in a state of insolvency or circumstances indicating insolvency under the law.
15. Failing to protect the Company's intellectual property.
16. Copying others' intellectual property.
17. Seeking personal or third-party benefits through improper means.
18. Allowing unauthorized access to Company computer systems or data.


## 2.3 Disciplinary Procedures

### 1. Minor Violations:

Directors, executives, and employees will receive a written warning specifying the violation and supporting reasons, with an opportunity to respond. If unresolved, the matter will be referred to a disciplinary committee. Repeated violations may result in strict disciplinary action, including termination.

### 2. Serious Violations:

Including bribery, fraud, disclosure of confidential or intellectual property information, or conduct damaging to the Company's reputation. The Company may terminate employment without compensation and without prior written warning.

	Reference No.	EXEC-2026/001	Edition	1 <sup>st</sup> Revised
	Policy Name.	Code of Conduct		
	For	Directors, Executives and Employees		

## 2.4 Handling of Insider Information

### Confidentiality of Insider Information

#### 1. Classification of Confidential Information

Insider information is considered confidential business information and must not be disclosed externally. Information may be classified into various confidentiality levels, including public, restricted, confidential, and highly confidential. Access must be limited to assigned duties.

#### 2. Disclosure to External Parties


Disclosure of confidential information to the public requires approval from the Chief Executive Officer or Managing Director or authorized representatives, typically through investor relations or designated departments.

#### 3. Expressing Opinions to External Parties

Personnel must not respond to external inquiries unless authorized. Unauthorized personnel must politely decline.

### Use of Insider Information

The Company recognizes the importance of and its responsibility to its shareholders and stakeholders in accordance with the principles of good corporate governance. Accordingly, in order to enhance confidence among shareholders, investors, and all related parties, the Company has established measures governing the use of inside information by its personnel. Such personnel include directors, executives, and those holding positions in accounting and finance division, employees, as well as the spouses and minor children of such persons. To ensure equality and fairness in the use of the Company's inside information, the Company strictly prohibits personnel at all levels as mentioned above, including their family members, who become aware of inside information that constitutes material facts affecting changes in the price of securities and that has not yet been disclosed to the public, from using such information for securities trading or from inducing, soliciting, or inducing others to purchase, sell, make a tender offer for, or offer for sale the Company's securities, whether directly or through brokers, regardless of whether such actions are taken for their own benefit or for the benefit of others. In addition, the Company prohibits the directors, executives and CFO and their family members from disclosing material, non-public information affecting securities prices to enable others to engage in such acts for their own benefit or for any consideration. The Company shall deem any misuse of inside information for the purpose of trading in the Company's securities as speculative trading or as creating an unfair advantage for any particular

	Reference No.	EXEC-2026/001	Edition	1 <sup>st</sup> Revised
	Policy Name.	Code of Conduct		
	For	Directors, Executives and Employees		

group. Such acts constitute offenses under the Securities and Exchange Act and other relevant regulations and are also considered disciplinary violations.

Furthermore, the Company prohibits directors, executives, relevant operational personnel, employees, workers, and other insiders, including persons presumed to possess or have access to inside information, as well as other listed companies related to such inside information, from disclosing financial statements or other information that may affect the price of the Company's securities to external parties or unauthorized persons. The Company also prohibits trading in the Company's securities during the period of one month prior to the disclosure of such information of the Company or the group to investors, and within 24 hours after such information has been disclosed to investors.

In addition, directors and executives are required to notify the Company Secretary of their intention to acquire, dispose, transfer, or receive a transfer of the Company's securities at least one business day in advance prior to conducting such transactions.

#### **Computer System and Information Security Measures**

The Company has implemented security measures including:

1. Restricting access to non-public information based on assigned authority and necessity.
2. Implementing workplace security systems to protect confidential documents and data.
3. Requiring information owners to ensure strict compliance with security procedures.


#### **2.5 Conflict of Interest**

##### **Prevention of Conflict of Interest**

The Company has established policies, measures, criteria, and operational manuals for segregating lending business functions to ensure that personnel perform their duties correctly. The Company also utilizes technology systems in the credit approval process to reduce the risk of conflicts of interest. The Company has operational control policies to ensure that guidelines established by management are effectively implemented by employees across the group. Appropriate authorization levels and approval authorities are defined, and duties are segregated to prevent fraud. The Company has also established procedures and methods for conducting transactions with major shareholders, directors, executives, or related parties to prevent conflicts of interest in accordance with the regulations of the Capital Market Supervisory Board and the Stock Exchange.

##### **2.6 Anti-Fraud and Anti-Corruption**

The Company aims to ensure that directors, executives, and employees understand the meaning of fraud and corruption in all forms, recognize their duties and responsibilities, and are able to apply anti-fraud and anti-corruption guidelines in their work. This includes establishing whistleblowing channels and regularly monitoring and reviewing anti-fraud and anti-corruption policies and practices.

	Reference No.	EXEC-2026/001	Edition	1 <sup>st</sup> Revised
	Policy Name.	Code of Conduct		
	For	Directors, Executives and Employees		

### Anti-Fraud and Anti-Corruption Policies and Guidelines

The Company has established policies and practices covering various areas, including the giving or receiving of gifts or other benefits, charitable donations or sponsorships, hospitality, political contributions, procurement, and other related matters. These policies are set out separately from the Code of Business Ethics. Details are provided in the “Anti-Corruption Measures Manual.”

#### 2.7 Protection and Safeguarding of Company Assets

The Company encourages its personnel to utilize Company assets for maximum benefit and to exercise caution in protecting Company assets from damage or loss. Personnel must not use Company equipment, property, or resources for personal benefit or for the benefit of unrelated third parties.

##### Guidelines for Protecting and Safeguarding Company Assets

The Company has established the following guidelines:

1. Use Company assets efficiently and solely for the benefit of the Company.
2. Do not misuse Company assets or use them for unlawful purposes.
3. Maintain and safeguard Company assets to prevent damage or loss.


#### 2.8 Disclosure of Information and Transparency

The Board of Directors places importance on the accurate, complete, timely, and transparent disclosure of significant information relating to the Company, including financial and non-financial information, in accordance with regulations of the Securities and Exchange Commission (SEC) and the Stock Exchange. This includes any information that may affect the Company’s securities price and influence decision-making by investors and stakeholders. The Company discloses required information through Stock Exchange channels, including financial statements and annual reports, and supports disclosure in both Thai and English through other channels such as the Company’s website, with regular updates. The Company also discloses corporate governance policies, the Board’s responsibilities regarding financial reporting alongside auditor reports in the annual report, roles and duties of the Board and subcommittees, number of meetings, attendance records of directors, and performance opinions.

The Company has an Investor Relations unit responsible for communicating with investors, shareholders, analysts, and relevant government agencies. The unit ensures disclosure of financial and non-financial information in accordance with regulatory requirements to promote transparency and equal access to information for all stakeholders.

#### 2.9 Intellectual Property and Use of Information Technology Systems

The Company places importance on intellectual property protection and the use of information technology systems as key corporate policies. The Company does not support or promote, directly or indirectly, the use of software

	Reference No.	EXEC-2026/001	Edition	1 <sup>st</sup> Revised
	Policy Name.	Code of Conduct		
	For	Directors, Executives and Employees		

that violates intellectual property rights of others. All employees are required to acknowledge this policy in writing and are prohibited from committing acts that infringe on intellectual property rights or violate the Computer Crime Act.

**2.10 Labor Practices and Human Rights**

**Human Rights Policy**

The Company recognizes that sustainable business operations require respect for human rights, which affect personnel, organizations, customers, communities, society, and business partners. The Company has established a human rights policy to ensure that business operations comply with applicable laws and internationally recognized standards, and to promote respect for and protection of fundamental rights and human dignity in the Company’s operations. The policy is aligned with domestic laws, international human rights principles, and best business practices, including Universal Declaration of Human Rights (UDHR), United Nations Guiding Principles on Business and Human Rights (UNGPs), United Nations Global Compact (UNGC), International Labor Organization (ILO) principles

Directors, executives, and employees must respect human dignity and treat all stakeholders equally, providing equal opportunities and avoiding discrimination based on race, skin color, gender, sexual identity, age, religion, language, beliefs, social status, family origin, disability, political opinions, or other legally protected characteristics. The Company conducts business with due diligence to prevent human rights violations in its operations.


**2.11 Treatment of Stakeholders**

The Company recognizes the importance of considering and caring for all stakeholder groups and respects stakeholder rights in business operations as follows:

**(1) Policy and Guidelines Toward Employees**

The Company recognizes that employees are a key success factor in achieving corporate objectives. The Company is committed to treating employees fairly in terms of opportunities, compensation, appointment, transfers, and capability development. Guidelines include:

1. Treat employees equally and fairly in terms of opportunities, compensation, welfare, and development. The Company values employee feedback and recognizes employees as valuable resources and key drivers of organizational success.
2. Provide fair compensation, including establishing a provident fund and emphasizing employee welfare.
3. Maintain a safe and healthy working environment to protect employees’ lives and property.
4. Ensure appointments, transfers, rewards, and disciplinary actions are conducted fairly based on knowledge, competence, and suitability.

	Reference No.	EXEC-2026/001	Edition	1 <sup>st</sup> Revised
	Policy Name.	Code of Conduct		
	For	Directors, Executives and Employees		

5. Emphasize employee knowledge and skill development by promoting training and seminars both internally and externally, providing equal and continuous opportunities for professional growth, and allocating annual training budgets to enhance expertise and work efficiency.
6. Listen to employees' opinions and professional suggestions.
7. Encourage compliance with laws and regulations related to employment and strictly comply with applicable laws and internal rules.
8. Provide fair and appropriate compensation based on employee knowledge, qualifications, and performance evaluation in accordance with Company criteria.

### **(2) Policy and Guidelines for Shareholders**

The Company is committed to maximizing shareholder satisfaction while ensuring sustainable growth.


The Company has established the following guidelines:

1. Treat shareholders equally, protect shareholders' interests, and refrain from any actions that violate or diminish shareholders' rights, while supporting the shareholders to exercise their rights. Basic rights of the shareholders include selling and transferring their shares, sharing profits with the Company, receiving adequate information about the Company, proposing additional agendas, nominating a person as director, attending shareholders meetings to vote for appointment or removal of directors, appointing auditors, considering matters that may have an impact on the Company. The Company is committed to maximizing shareholder satisfaction while ensuring sustainable growth, creating added value, and providing appropriate and continuous returns.
2. Regularly and comprehensively present operating results, financial position, accounting information, and other reports on an equal basis.
3. Prohibit seeking personal or third-party benefits through the use of any non-public Company information or engaging in any actions that may create conflicts of interest with the Company.

### **(3) Policy and Guidelines for Customers**

The Company recognizes the importance of customers and has established the following guidelines:

1. Strive to create satisfaction and confidence among customers by providing attentive and responsible service. Customers must receive good quality, fair services in accordance with established standards.
2. Maintain customer confidentiality and not use such information for personal or improper related-party benefits.
3. Provide accurate, sufficient, and timely information to customers regarding the Company's services.
4. Strictly comply with terms and agreements with customers, continuously improve service quality standards, and maintain good and sustainable customer relationships.

	Reference No.	EXEC-2026/001	Edition	1 <sup>st</sup> Revised
	Policy Name.	Code of Conduct		
	For	Directors, Executives and Employees		

#### **(4) Policy and Guidelines for Business Partners and/or Creditors**

The Company requires employees at all levels to treat business partners and/or creditors fairly, honestly, and without exploitation, while considering the Company's best interests and fair mutual benefits. The Company also avoids situations that may cause conflicts of interest and resolves issues based on sound business relationships. The Company has established the following guidelines:

1. Conduct business fairly, honestly, and without exploitation, while protecting mutual benefits with partners and creditors by strictly complying with applicable laws, jointly agreed rules, and business ethics. Employees must not request, accept, or offer any improper benefits in business dealings and must strictly comply with contractual conditions.
2. Treat creditors fairly, including timely repayment, proper maintenance of collateral, and full compliance with contractual terms in accordance with good corporate governance principles. The Company will notify partners and creditors in advance if it is unable to fulfill contractual obligations and will jointly seek solutions.


#### **(5) Policy and Guidelines for Competitors**

The Company is committed to conducting business fairly, equally, and with integrity, and to treating competitors fairly without violating or obtaining competitors' trade secrets. The Company has established the following guidelines:

1. Treat competitors in accordance with international principles and legal frameworks governing fair competition.
2. Not obtain confidential competitor information through dishonest or inappropriate means.
3. Adhere to fair competition rules, not obstruct others from participating in business competition, and not damage competitors' reputations through false accusations or unfair practices.

#### **(6) Policy and Guidelines for Society and Communities**

The Company aims to conduct business beneficial to the economy, society, and the environment by acting as a responsible corporate citizen and fully complying with relevant laws and regulations. The Company also supports initiatives that improve the quality of life in communities where it operates alongside its business growth, including promoting cooperation with various organizations in education, safety, and other community-related activities. The Company conducts business with responsibility toward communities and society, emphasizing safety, quality of life, efficient energy use, and community well-being.

	Reference No.	EXEC-2026/001	Edition	1 <sup>st</sup> Revised
	Policy Name.	Code of Conduct		
	For	Directors, Executives and Employees		

### (7) Environmental Policy

The Company recognizes the importance of efficient use of natural resources, environmental impact management, and conservation. The Company conducts business with environmental responsibility and has established the following policies:

1. Conduct business in strict compliance with environmental laws, regulations, and policies while considering impacts on natural resources and the environment.
2. Promote an organizational culture and awareness among employees to cooperate and take responsibility for environmental management and efficient resource use.
3. Conduct business responsibly toward environmental conservation, promote efficient energy usage, and consider reducing greenhouse gas emissions (Scope 1, Scope 2, and Scope 3) to mitigate climate change impacts, including providing environmental knowledge and training to employees to reduce and manage greenhouse gas emissions.

### (8) Policy and Guidelines for Government Sector

The Company requires that transactions with government agencies strictly comply with applicable laws and local regulations and prohibits any actions that may improperly influence government officials.

#### 2.12 Occupational Health, Safety, and Work Environment

##### Health Policy and Guidelines

The Company emphasizes health and wellness by providing annual health check-ups, vaccinations against communicable diseases, and medical expense reimbursement benefits. The Company also provides adequate and appropriate employee welfare and promotes exercise and healthy lifestyles.

##### Safety and Work Environment Policy and Guidelines


The Company provides a safe and hygienic work environment, controls and reduces risks of accidents and occupational health hazards, provides protective equipment, and conducts regular training. The Company also establishes a business continuity management plan to address emergencies or disasters.

#### 2.13 Personal Data Protection

The Company recognizes the importance of personal data protection and aims to ensure proper management of personal data, including collection, use, disclosure, and secure storage.

##### Personal Data Protection Guidelines

1. Directors, executives, and all employees must strictly comply with laws, policies, regulations, manuals, and Company guidelines relating to personal data protection.

	Reference No.	EXEC-2026/001	Edition	1 <sup>st</sup> Revised
	Policy Name.	Code of Conduct		
	For	Directors, Executives and Employees		

2. Promote awareness and understanding among employees regarding the importance of personal data protection, including risk management at all organizational levels and effective internal control measures to prevent improper collection, use, or disclosure of personal data.
3. Personal data collection must be limited to what is necessary and for lawful purposes related to the Company's data processing activities only.
4. Collection, use, or disclosure of personal data must obtain explicit consent from the data subject and provide required details to the data subject before or at the time of data collection in accordance with applicable personal data protection laws.
5. Collection, use, or disclosure of personal data must be conducted in accordance with the purposes previously notified to the data subject unless otherwise permitted by law.
6. If any Company department appoints a data processor to collect, use, or disclose personal data on behalf of the Company, a contractual agreement must be established to ensure compliance with personal data protection laws and to prevent improper or excessive use or disclosure of personal data.


#### **2.14 Anti-Money Laundering**

The Company has established an Anti-Money Laundering, Counter-Terrorism Financing, and Counter-Proliferation Financing Policy (AML/CFT/WMD) in accordance with the guidelines of the Anti-Money Laundering Office (AMLO). The policy covers customer acceptance procedures, risk management measures relating to AML/CFT/WMD across organizational operations, customers, products, services, and service channels, including those involving current and future technologies. The Company has also established customer due diligence procedures and requires executives and employees to effectively comply with relevant policies, measures, and guidelines to prevent the Company from being used as a tool for criminal activities, money laundering, terrorism, fraud, or corruption, which may damage the Company's reputation and operations.

The AML/CFT/WMD policy supports compliance with anti-money laundering and counter-terrorism financing laws, including strict customer due diligence, transaction reporting, and other legal obligations. This policy serves as a core policy across the Company's business group to ensure standardized practices and legal compliance.

#### **2.15 Internal Control and Internal Audit**

The Company places importance on internal control systems at both management and operational levels. The Internal Audit Department conducts audits to ensure that operations and key Company activities comply with established guidelines and operate effectively, including compliance with applicable laws and regulations. The Board of Directors prioritizes strong internal control systems by appointing an Audit Committee to review and ensure that the Company group maintains appropriate and effective internal controls in compliance with securities and exchange laws, stock exchange regulations, and other relevant laws.

	Reference No.	EXEC-2026/001	Edition	1 <sup>st</sup> Revised
	Policy Name.	Code of Conduct		
	For	Directors, Executives and Employees		

The Company evaluates its internal control system through inquiries with management and relevant personnel, review of past audit reports, and assessment across five COSO components: Control Environment, Risk Assessment, Control Activities, Information and Communication Systems and Monitoring and Reporting Systems. The Board of Directors evaluates the adequacy of these five internal control components annually to ensure that the Company maintains sufficient and appropriate internal controls for transparent operations in line with good corporate governance principles.

#### 2.16 IT Security

The Company ensures that its information technology systems, network systems, and shared computer systems operate appropriately, securely, and continuously support business operations. The Company requires proper system usage in compliance with computer-related laws and other applicable regulations and implements measures to prevent cyber threats that may cause damage to the Company.

### 3. Corporate Governance on Compliance with the Code of Business Ethics and Whistleblowing


#### Guidelines for Promoting Business Ethics

1. The Company prepares a written Code of Business Ethics and disseminates it throughout the organization so that employees at all levels can study and understand it. Employees are required to acknowledge the Code in writing and adhere to it as a guideline for their work.
2. The Company instills corporate values and fosters an organizational culture that promotes ethical values among directors, executives, and employees at all levels. The Company enhances knowledge, understanding, and awareness of ethics through training activities. Training on the Code of Conduct is designated as a core topic that all employees must attend, with annual refresher training.
3. The Company establishes operational guidelines for handling ethical issues, including complaint handling, investigation, whistleblower protection, and disciplinary actions.
4. The Company conducts regular audits, internal control assessments, and evaluations of compliance with the Company's Code of Business Ethics on an annual basis.

#### Reporting Non-Compliance with the Code of Business Ethics and Whistleblowing

##### Reporting Channels

1. Report directly to the Chief Executive Officer and Managing Director.
2. Report directly to the Chairman of the Audit Committee through the Secretary of the Audit Committee.
3. Report to a supervisor.
4. In cases involving senior executives or directors, report directly to the Chairman of the Audit Committee.

	Reference No.	EXEC-2026/001	Edition	1 <sup>st</sup> Revised
	Policy Name.	Code of Conduct		
	For	Directors, Executives and Employees		

5. Submit a written complaint to the complaint recipient, namely the Chairman of the Audit Committee, Chairman of the Corporate Governance and Sustainability Committee, Company Secretary, Head of Internal Audit Office, or the Head of Human Resources Department, at the following address:

**Postal Mail:** Srisawad Capital 1969 Public Company Limited  
99/392 Srisawad Building, Floors 1,5 and 6, Soi Chaeng Watthana 10 Intersection 3  
(Benjamit), Chaeng Watthana Road, Thung Song Hong, Lak Si Bangkok 10210

**Email:** AC@srisawadcapital.co.th

**Website:** <https://investor.srisawadcapital.co.th/th/corporate-overnance/whistleblowing-channel>

**Call Center:** 02-691-5600

#### Fact-Finding Investigation Process

The Company has a complaint and whistleblowing policy to serve as a guideline for receiving complaints, conducting fact-finding investigations, and fairly determining disciplinary actions against offenders. The Company allows all stakeholder groups to submit complaints if they observe unethical conduct and provides protection to whistleblowers in accordance with the Company's whistleblower protection policy.


#### Whistleblower Protection

The Company has measures to protect whistleblowers, individuals reporting unethical conduct, and related persons, as detailed below:

1. The Company will protect complainants and information providers to the fullest extent possible and will not disclose any information that could identify the whistleblower. All information will be kept confidential.
2. The Company will prioritize personal rights and safety of whistleblowers, sources of information, and related persons. Complainants, information providers, sources of information, and related persons are entitled to appropriate and fair remedies through protective measures.
3. Persons receiving complaint information and those involved in fact-finding processes must maintain confidentiality of complaint details, including all related documents and evidence. Disclosure to unauthorized persons is strictly prohibited unless required by law.

#### Disciplinary Actions

Directors, executives, and all employees must strictly comply with this Code of Business Ethics, including any related policies and regulations. Failure to comply shall be considered a disciplinary offense under the Company's regulations. The Company prohibits employees or any persons from making false accusations or providing false information that may cause harm to others. If the Company determines that any complaint, tip-off, or information is intentionally dishonest, false, or intended to cause damage, the individual providing such false information will be subject to disciplinary action in accordance with the Company's personnel regulations.

	Reference No.	EXEC-2026/001	Edition	1 <sup>st</sup> Revised
	Policy Name.	Code of Conduct		
	For	Directors, Executives and Employees		

This Code of Business Ethics Manual has been approved by the Board of Directors.

Mr. Pinit Puapan

Chairman

Srisawad Capital 1969 Public Company Limited