

## Code of Conduct

Thantawan Industry Public Company Limited

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## Code of Conduct

### Vision

The Company's vision is to be the leader in international packaging innovation.

### Mission

The Company will apply innovative technology and packaging experience to design, research, manufacture and distribution as well as being a service provider that creates added value to business partners in order to create sustainable returns to all stakeholders.

### Business Principles

The Board of Directors has a policy to promote morality, ethics, transparency by focusing on conducting business according to the code of conduct in all aspects and in accordance with the principles of corporate governance policy to lead to a good corporate governance. The Board of Directors has set "Code of Conduct" to be used as a good practice in doing business with fairness in order to relevant persons both inside and outside the organization including treatment of stakeholders, including shareholders, employees, customers, business partners/creditors trade competitors, society as a whole in conducting business together with fairness to create stability and continuous growth and sustainability for the organization and shareholders.

Thantawan Industry Public Company Limited deems that this "Code of Business Conduct" is part of the regulations on personnel management that Executive Directors, Executives, employees such persons must abide by the discipline of the Company and is guilty of disciplinary action if neglected

The Company believes that Directors, Executives and employees of the Company behave properly and properly in accordance with the Code of Conduct. This will enable the Company to be recognized by all parties involved in doing business ethically forever.

### Objectives

1. To guide the general principles to directors and Executives of the company to be awareness and commitment to ethical principles and legal aspects of business operations.
2. To communicate channel for stakeholders to report any act that is legal or against to ethical principles. to ensure that the information is the best treated as confidential.
3. To strengthen the confidence of shareholders, employees, customers, trade partners/creditors, government and society. to achieve the business goals of the Company.
4. To achieve the business goals of the Company.
5. To comply with the principles of good corporate governance.

### Definition

Code of Conduct means Code of conduct established by the Company to maintain and promote the reputation of the company.

The Company	means	Thantawan Industry Public Company Limited
Directors	means	A Director of Thantawan Industry Public Company Limited
Executives	means	The Executive in the position of Chief Executive Officer, Deputy Chief Executive Officer, Chief Operating Officer or equivalent
Employees	means	Temporary employees or contract employees.
Related person	means	A person in any of the following relationships <ol style="list-style-type: none"> <li>1) Person who has control over the Company and in the case of a juristic person, including the Directors of that juristic person.</li> <li>2) Spouse, underage child or adopted child of Directors, Executive or person under (1)</li> <li>3) Juristic person in which the person under (1) or (2) has the power to manage the business.</li> <li>4) Other persons with characteristics as specified by the office of the Securities and Exchange Commission and the Stock Exchange of Thailand.</li> </ol>
Stakeholders	means	Shareholders, employees, customers, trade partners / creditors Competitors Private sector community and environment.
Disclosure	means	Disclosure of details and information related to physical activities Business of the company according to the Public Company Limited Act 1992, Securities Act B.E. 2535 and the latest revised version. Regulations of the Stock Exchange of Thailand and the Office of the Securities and Exchange Commission. And stock exchange.
Conflict of Interest	means	Carrying out any activities that may have personal needs or related persons' benefit, whether by blood or any other way which leads to influence a decision or may hinder or an obstacle to the best interests.
Corruption	means	Improper use of power, such as giving gifts or services, giving cash or things instead of cash, bribing government officials, government agencies and private agencies. No matter what format by offering, promise, promise, claim or receipt of money or things instead of cash, other benefits that is not suitable and anonymity or facts. This is an action that is against the law, rules and policies of the Company or against morality and good business ethics. This includes providing business interests for oneself, friends and acquaintances in performing duties that bring improper benefits. Unless it is an act in case of law, regulations, local traditions or the trade tradition to be able to do.

## Part 1 The Board of Directors and Executives

### **The Board of Directors**

The Board of Directors are responsible for the preparation “Code of Business Conduct” of Thantawan Industry Public Company Limited and review or improve to be appropriate including receiving complaints review and follow up on compliance with the code of conduct.

#### **1. Executives at all levels perform duties**

- To encourage compliance with the code of conduct and behave as a role model.
- To transfer of policy and practices in conjunction with listening to an opinion widely about a compliance issue.
- Training Employees to take responsibility and provide management system that comply with legal requirements and regulations of the Company.
- To supervise the operations of the agency in accordance with relevant regulations.

#### **1.1 Directors**

- 1) All directors shall make an appropriate decision and perform duties with integrity for the utmost benefits of the company. the directors shall operate and make decision with carefulness and prudence similarly to people in similar business situations.
- 2) Directors must not seek any undue benefit from the position of directors both direct and indirect for personal benefit or others concerned. they must disclose any personal benefit information that may cause a conflict of interests to the company or the cause of the conflict of interest with the Company.
- 3) Directors must not take any information that obtained from the position as directors in a manner of inappropriate. the use of insider information for trade securities of the company is prohibited. they shall clearly and fully disclose information and prepare a report of their holding of shares to the office of the Securities and Exchange commission (SEC) according to the rules and regulations pursuant to the Stock Exchange of Thailand (SET). those who acknowledged the insider information should not be trading the securities of the company within 1 month prior to publish financial statements to the public and at least 24 hours after it has been disseminated.
- 4) Directors must not disclose trade secrets or Ley business information to the third parties. additionally, they must not provide information not yet disclosed to anybody which may affect to the price or value of securities of the Company.
- 5) Directors as the authorized persons must make a decision and perform to preserve the interests of the company including shareholders, Employees, customers, trade partners/creditors and other stakeholders.

- 6) Directors shall comply strictly with laws and with transparency and accountability. they must not accept any proposal or gift or other valuables from stakeholder that may influence their decisions, actions or omissions or assignment to any fraud.
- 7) Directors are persons who have been trustfully assigned by shareholders. therefore, they have to protect shareholders' right.
- 8) The Board of Directors must not offer undue benefits to shareholders or to third parties other than in normal course of business.

## 1.2 Executives

Executives of the company who have been selected as an expert, leadership and be capable to control the operation of the company with efficiency and productiveness. in order to achieve its goal, company Executives are subject to the following practices.

- 1) To act with integrity for the utmost interests of the Company.
- 2) To apply their knowledge and management skills with their best ability for the interests of the Company.
- 3) To perform duties carefully without any obligation that may conflict with their duties afterward.
- 4) To be responsible for decision making and executions on their own as well as being able to clarify or explain on it.
- 5) To refrain from seeking the benefit, whether for themselves or for their related persons, by taking any nonpublic information which may affect to conflict of interest of the Company.
- 6) To give priority to the development of skills and competency of employees by giving them the opportunity comprehensively and on a regular basis.
- 7) To comply strictly with laws and regulations in relation with the employees and pay attention to the employee's comments.
- 8) To practice to staffs with courtesy and pay respect to individuality and the dignity of humanity. and also avoid any unfair action which may harass and pressure to the state of mind of the employees.
- 9) To educate employees to understand the ethics and duties that they comply and to promote ethical behavior within the framework throughout the Company.
- 10) To create awareness to employees at all levels to take responsibility to society without doing any damage to natural resources and environment.
- 11) To conduct or supervise employees to comply strictly with the spirit of the laws and regulations.
- 12) To strictly keep the confidential information of the company and customers and shall not disclose confidential that has not been published.

## Part 2 Employees

**Employees** this is considered to be a duty of Employees, to understand and strictly comply with the code of conduct. any queries or questions, please consult with supervisor, human resources or assigned person to take responsible for monitoring through various channels as defined. Also to notify the supervisor or person in charge when find any violation or non-compliance and to co-operate in such a fact investigation with agency or appointed person by the Company.

- Failure to comply with the principles of code of conduct.
- Suggestion, promote or encourage others who are not compliance with our code of conduct.
- To be neglected and ignored when found in violation or failure to comply with the code of conduct or in the event that they know or should know, relating to work under their responsibility.
- Non-cooperation or interference on the investigation or on fact finding regarding violation or non-compliance to the code of conduct.
- Be unfair to others, due to such non-compliance reports.

### **2.1 Code of Conduct for Treatment of the Company**

#### **2.1.1 Laws and regulations of the Company**

- 1) Employees must strictly comply with laws, regulations, regulations and orders of the Company.
- 2) Breaking the law, Shareholders resolution, the Board resolutions, regulations, rules or orders requesting the Company by reference whether it is an action to increase profits for the Company or any other reason.
- 3) Employees must perform their duties honestly, taking into account the legitimate interests of the Company. Although there are legal gaps or regulatory gaps, regulations and orders of the Company.

#### **2.1.2 Protection of the Company Assets**

- 1) The Company's assets mean chattel, real estate, technology, academic knowledge, information, copyright rights, and any resource of the Company or which the Company has rights.
- 2) Employees have duties and responsibilities to use the Company's assets economically in order to make benefit to the Company wisely. and take care not to be degraded or lost.
- 3) Business information and documents are important assets of the Company. Each agency must define a period of keeping documents, secrecy layer of document and keep such documents in complete and can be checked.
- 4) Employees are required to provide business documents, accounting and finance, and various reports submitted to government agencies and others with care and good faith

and must be recorded along the way with the Company's accounts in accordance with the prescribed standards.

- 5) Employees must comply with financial accounting rules, and internal control strictly at all times and must notify the responsible person in the department or the corporate governance team if any mistake is found during operation.

## 2.2 Code of Conduct for Employees

- 1) Employees who are supervisors shall conduct themselves in a manner which will be respected by the employees. Employees shall refrain from any conduct that is disrespect of supervisors.
- 2) Employees shall be protected from any deliberate discrimination or harassment in word or action against others based on the basis of race, gender, religion, age, and physical or mental disability.
- 3) Employees shall behave in a faithful, honest and conscientious way to create the quality, efficiency and for organization excellence.
- 4) Employees should not make any malicious accusation on any executives or other employees without truth.
- 5) Employees should work together to maintain the working environment of unity.
- 6) Employees should refrain from any action that will damage the reputation of company or may be a source of embarrassment for the company. Employees should protect their honor to be accepted by the society.
- 7) We encourage all employees to exercise your rights of citizenship in accordance with the constitution and relevant laws.
- 8) The direct or indirect employment of our assets for any political support is strictly prohibited.
- 9) Employees of all levels of the Company must follow the Company's methodology by the same standard by working full time for the Company to the utmost of our ability without obstructing the time in working to do any other business outside that is not related to the Company's interests.

## Part 3 Code of Business conduct

### 3.1 Stakeholders

committed to promoting the Company as an efficient entity that is responsible to stakeholders whether business related or personnel related. the company has defined the following basic guidelines for directors, the management and employees.



### 3.1.1 Shareholders

- 1) The Company is determined to create growth on the potential or the real capability to provide shareholders with suitable return on investment. with efficient business management of the Company for prosperity, stability and sustainability.
- 2) The Company will disclose information on operating results status report and the Company's information is truthful, complete, adequate, fair and transparent. according to the Stock Exchange of Thailand and the Office of the Securities and Exchange Commission.
- 3) The Company provides a variety of information dissemination channels including the preparation of the Company's website for shareholders to have easy access to information and prepare information in languages that are easy to understand in both Thai and English.
- 4) The Company will treat all shareholders equally both in the shareholders' meeting and other cases accordingly to the regulations of the Stock Exchange of Thailand and the Office of the Securities and Exchange Commission and other related laws as well as decide to take any action with fairness to both large and small Shareholder.
- 5) The Company will comply with the laws, objectives, articles of association, Directors' resolution, Shareholders meeting resolutions, the best practices of corporate governance principles and ethics and operate business ethics and treat all Shareholders equally for both major and minor Shareholders for the best interests of Shareholders.
- 6) The Company will perform duties and make decisions with competence with care by applying knowledge, experience, expertise and management skills to the best in every case.
- 7) The Company will not seek benefits for itself and the related parties by using any information of the Company which has not yet been disclosed to the public
- 8) The Company will not disclose any confidential information of the company wrongly against others.
- 9) The Company will not take any action. In a manner which may cause a conflict of interest with the Company.

### 3.1.2 Customers

- 1) The Company will treat all customers with honesty and fairness and protect the interests of all customers with equality.
- 2) The Company produces quality products and complies with various contracts, agreements or conditions to customers strictly, transparently and equally. In the event that

this cannot be done, negotiation must be made in advance in order to work together to find solutions and prevent damage.

- 3) The company will strive to develop excellent products that meet customer needs Invent new innovations to add value to the product to create satisfaction and confidence for customers to receive the product and quality service under safety and appropriate technology including continuously raising the standards to a higher level.
- 4) The Company will disclose information about the service completely, correctly and up to date and does not distort facts as well as maintain a good and lasting relationship.
- 5) The Company will organize a customer service system and open communication channels so that customers can complain their dissatisfaction and take the best action in order to respond to customer's need quickly.
- 6) The Company always attaches great importance to keeping confidential information of its customers and does not use such information for their own benefit and/or other related parties.

#### **3.1.3 Business partners**

- 1) The Company will treat its trade partners equally, transparently, fairly and on the basis of receiving fair compensation for both parties including strictly following the contract, agreement or agreed conditions.
- 2) The Company aims to develop and maintain a lasting relationship with trade partners with a clear objective in terms of the quality of products and services that are worth the money, technical quality and trust each other.
- 3) The Company will not claim, accept, or pay any benefits trade with partners in bad faith.
- 4) The Company will comply with the procurement regulations used in the procurement and auction processes.
- 5) In the event that the conditions cannot be done, the business partners will be notified in advance to jointly consider solving the problem with reasonable principles.

#### **3.1.4 Business Competitors**

- 1) The Company will compete in trade under the rules of good competition, not violating the trade secrets of competitors by dishonest or improper means. It also does not destroy its reputation by accusing competitors.
- 2) The Company will treat its competitors fairly and on the basis of obtaining fair compensation to both parties.

- 3) The Company will act within the framework of fair competition.

#### 3.1.5 Creditors

- 1) Stringently, transparently and equally to observe contracts, agreements and conditions that give to creditors.
- 2) Make a report the company's financial status consistently with integrity, accuracy and promptly to creditors.
- 3) If conditions cannot be observed, negotiate with creditors well in advance to jointly find remedies and prevent damage.

#### 3.1.6 Employees

- 1) The Company will create and manage the working environment to ensure the safety of life, health, physical and property of employees are always including business management in a way that takes into account the environment. The Company provides a workplace that is free of hazardous substances for safety and health or, if any, will control such hazardous substance to be within acceptable criteria.
- 2) The Company will provide fair compensation and appropriate according to knowledge, ability, responsibility and the performance of each employee.
- 3) Employment, appointment, migration, as well as award and punishing employees must be done with equality and honesty and based on knowledge, capability and suitability including the action or the practice of that employee.
- 4) The Company will treat employees on the basis of justice and give importance to the development Knowledge transfer and competence of employees encourage employees to receive additional training in a field related to their job duties by providing opportunities for employees thoroughly and regularly.
- 5) The Company will comply with laws and various regulations involving strictly employees.
- 6) The Company will manage the work by avoiding any action that is not fair which may affect the stability of the employees' performance.
- 7) The Company listens to opinions and suggestions of employees at all levels which is based on the professional knowledge of the employees equally and equally.
- 8) The Company encourages employees to encourage employees to be good, morals, and understand ethics and roles and responsibilities to promote behavior within the framework of ethics throughout the company.
- 9) The Company encourages employees to participate in determining work directions including solving problems of the department and the Company as a whole.

### 3.1.7 Communities, Society and Environment

The Company realizes the importance of conducting a balanced business both economic, social and environmental aspects so that the company can grow steadily and sustainably to be an efficient organization along with being a good organization of society. Therefore, the Company determined to operate business with honesty and fairness, complying with all relevant laws and regulations and take into account the benefits and impacts of the operations of Organization to stakeholders of the Company, which are shareholders, employees, customers, trade partners/creditors, competitors as well as the operations on safety, health and environment so that it does not affect all stakeholders.

- 1) The Company does not do any acts that damage the natural resources and the environment beyond the law stipulated.
- 2) The Company cooperates and controls to strictly adhere to the spirit of laws and related regulations.
- 3) The Company does not support any activities that are harmful to society or good morals and/or to promote vices.
- 4) The Company supports activities that cause public benefits, provide importance to the activities of the community and society, focus on social development, community, environment, creativity and conservation of natural resources, promote efficient energy conservation for the benefit of future generations.
- 5) The Company instills the awareness of social and environmental responsibility and employees at all levels continuously.
- 6) The Company provides a quick response and effective against events affecting the community and the environment. This is due to the operation of the company by fully cooperating with government officials and related agencies.
- 7) The Company has set up a grievance system for matters that may affect the community, conduct a cause investigation, revise and inform the performance results to the complainant in a reasonable time.

### 3.2 Respect of the laws and Principles of universal human rights

- 1) Employees must thoroughly study laws relevant to their roles and responsibilities while strictly complying with them. If in doubt, they must seek advice from the law department and must never follow their own interpretation.
- 2) the Company has categorized laws and public rules for ready reference and provides due employee training.
- 3) the Company must strictly conduct the principles of universal human rights. to educate employees in regard to their performing job. the company does not encourage any undertaking that violates these principles.

- 4) During overseas business trips, employees should study relevant countries' laws, customs and cultures, prior to making the trips. to ensure that the goods, samples and equipment, travel documents, trip objectives and performance of their duties are lawful and not against local customs and cultures.

### **3.3 Safety, Health and environment**

The Company is committed to providing the well-being of employees and communities around our workplace and to maintain a positive environment. The Company will prescribe work practices to ensure safety in the workplace as required with related laws and regulations.

#### **3.3.1 Safety and Occupational Health**

- 1) The Company will comply with various laws and regulations in regard to safety, occupational health and will apply reliable safety management standards in the absence of laws and regulations.
- 2) The Company will maintain a working environment that is safe for life and property of employees. The Company will try to prevent accidents, injury and illness as regards with the work with the serious cooperation of all employees. It will limit and manage safety risks arising from business operations.
- 3) The Company will arrange for the establishment of a regulation for action planning and training employees to understand and receive adequate information on work safety in order to prevent possible dangers caused by machines or various diseases.
- 4) The supervisor is responsible for defining or disseminating guidelines for the prevention and control of accidents and occupational hygiene problems for employees and related persons including organizing a health check for employees according to the risks of the employees.

#### **3.3.2 Society and environment responsibility**

- 1) The Company will comply with laws and various regulations. For the environment, the Company will comply with the ISO 14001 system.
- 2) The Company has a policy to conduct business with regard to society and environment and will comply with the legal requirements and related regulations including the regulations of local government organizations such as municipalities, subdistrict administrative organizations, etc.
- 3) The Company will cooperate in reducing waste generation or waste from the production process and general use. The Company will study and cooperate in waste disposal or waste by the correct method.

- 4) The Company will continue to conserve natural resources by reducing the amount of unnecessary use, recycle natural resources and product development by using biodegradable raw materials.
- 5) Employees involved in the production process or machines Has a duty to improve and maintain production process or machinery to meet the specified standards to reduce the use of natural resources.

### 3.4 Conflict of Interest

Any actions of the Company will be based on the Company's best interest and will not be involved in activities that may create a conflict of interest with the following guidelines.

- 1) Directors, Executives and employees avoid doing any connected transactions with themselves. It may cause a conflict of interest with the Company, performance of duties and holding positions must not conflict with the interests of the Company's decisions regarding the Company's business operations must be in the best interests of the Company.
- 2) Any actions and decisions made by Directors, Executives and employees at all levels must be free from the influence of personal needs or of persons related to Directors, Executives and such employees. Either by blood relation or by someone who is personally known and use the fair and appropriate price as if transactions with outsiders. When deciding or approving an item that may lead to a conflict of interest, report the supervisor or participant in the approval and withdraw from participation in the transaction.
- 3) In considering transactions that have or may have conflicts of interest between Shareholders, Directors, Management and other persons who may have other conflicts which is clearly used as a guideline and can be confident that the transaction is fair, transparent, reasonable, and discloses correct and complete information.
- 4) The Executive Director is required to report to the Company about his or her interests and/or the interests of related persons which are stakeholders involved in the management of the company. In addition, it is obliged to comply with the regulations of the Stock Exchange and the Securities and Exchange Commission regarding the disclosure of information on connected transactions.
- 5) In the event that Directors, Executives, employees or family members participate or become Shareholders in businesses that compete with the Company's business or any business that may cause a conflict of interest with the Company. It must notify the Board of Directors in writing.
- 6) Employees of all levels of the Company must avoid any financial involvement and/or relations with other third parties which will result in the Company lose interest or cause a conflict of interest or hinder effective operations.
- 7) During working for the Company and after working for the Company, Directors, Executives and employees must not disclose information that is considered the Company's secret for the benefit of

anyone, whether it is electronic information, financial information, operations, business information, future plans of the Company and others.

### 3.5 Connected Transaction

The Company adheres to the following guidelines for operating the related transactions in accordance with the nature of normal trade and for the best interest of the Company.

- 1) The Board of Directors must perform their duties in accordance with the law on securities and exchange and the regulations, announcements, orders or requirements of the Stock Exchange of Thailand including requirements on the disclosure of related transactions and the acquisition or disposition of important assets of the Company according to the accounting standard stipulated by the Federation of Accounting Professions.
- 2) In conducting related transactions under the announcement of the Stock Exchange of Thailand, it must strictly adhere to the relevant rules, procedures and disclosures.
- 3) In the event that it is necessary to make a transaction that is related take into account the interests of the Company as the main concern and to do such transactions as transactions with external parties by Directors, Executives and all employees related to such transactions must not participate in the approval.

### 3.6 Maintaining confidential information and use of inside information

The protection of inside information is very important to the success of the company. It is also important to the stability in the career of all employees as well as provide information to third parties in a way that will not cause damage to the business and reputation of the Company. The Company, therefore, has a policy to prohibit and have a way to supervise the Company's employees in using the Company's inside information which has not yet been disclosed to the public in order to use it for personal gain or others Including for trading in securities especially in the 1 month before the financial statements were released to the public Code of conduct for confidentiality and use of inside information as follows;

- 1) The Company informs Directors and Executives of their obligations to report their securities holdings in the Company, their spouses and children who are under the age of majority as well as report the change in holding Securities to the Securities and Exchange Commission under Section 59 and the penalties under Section 275 of the Securities and Exchange Act B.E. 2535.
- 2) Proceeds to notify the Executive Director, Department Manager and employees of the Company should avoid using the Company's inside information that is not yet publicly disclosed which is essential to the change of the Company's share price, use it for personal gain, including for securities trading, if The Company found that Directors, Executives, managers and employees of the Company violated this prohibition. The Company will consider taking action according to the law.
- 3) Employees of all levels of the Company should maintain inside information and documents that cannot be disclosed to third parties that leading to self-interest or family exploitation or their

associates in the wrong way, such as information that affects stock prices, trade secrets, various inventions which is the right of the Company.

- 4) Employees of all levels of the Company, the confidential information will not be used for personal gain or others.
- 5) Employees of all levels of the Company received personal information must be maintained or use such information carefully.
- 6) The Company stipulates that the information relating to the counterparty and the agreements made with the counterparty is confidential and cannot be disclosed to other parties unless the Company receives permission and the parties only.
- 7) Employees at all levels must protect the Company's intellectual property, including copyrights, patents, trademarks, trade secret and other information on the Directors' rights of the Company and must strictly respect the intellectual property rights of others.
- 8) The Company should provide measures and a system to supervise the Company's information within their department or department. This is to prevent any important inside information of the Company that could be revealed to the outside before the official release. This measure and control system are also considered to be part of the Company's important risk control measures.
- 9) The Company assigns the duties and responsibilities of supervisors in different hierarchies. They must control the leakage of important information and the Company's information to the outside by employees in their command line before the official dissemination of the Company's information.
- 10) Employees who share the inside information must be done according to their framework and the responsibilities that the employees should be assigned only.
- 11) Employees of all levels of the Company will not disclose any confidential information of the Company even after its termination or termination by duties.

### **3.7 Giving or Acceptance of Present, Properties or other benefits**

The Company requires that giving or receiving gifts, property or any other benefit according to the action in a reasonable way but it must not influence the decisions of the Company. Therefore, the Company prescribes the following guidelines as follow;

- 1) Employees of all levels and/or their families should not demand gifts or any other assets or benefits from contractors, vendors, venture capitalists or people involved in the Company's business in any case.
- 2) In case the supervisor considers the gift unworthy, property or any other benefit to return to the giver immediately. If it cannot be returned, it should be delivered to the supervisor in order to be the right of the Company.



- 3) Gifts are given to the Company, it is also valuable to remember the important events of the Company, such as when signing various joint venture agreements of the Company when receiving awards or souvenirs from participating in support society activities, etc. Then employees of all levels are representative of the Company and allowed to accept those gifts.
- 4) Employees of all levels of the Company should not give gifts to supervisors. Except in the case of normal traditions where gifts are given to each other but it must have a price or value not exceeding three thousand baht.
- 5) In the case of receiving property or any other benefit, either it is received either from within the country or from abroad. The price is more than three thousand baht whether identified as personal or not. Yet, it must be accepted in order to maintain goodwill or good relations between individuals. The recipient must report to their supervisor as soon as possible. If the supervisor sees that there is no reason to allow the recipient to take it as personal benefit, the recipient must deliver to Supervisor. As a result, the property or benefit will immediately belong to the Company.
- 6) Employees of all levels of the company should not give, receive, promise to give or will receive any benefit or value to motivate them to act or ignore practice including any action that falls within the aforementioned criteria.

In the event that the Company detects a misconduct of moral and ethical conduct of service users, the Company will consider taking disciplinary measures in accordance with personal policies and procedures for the holders and/or users who violate the service, policies and procedures This may include the cancellation of the right to use information technology systems as well.

### **3.8 Anti-Corruption**

The Company has established business principles that do not support group activities or a person who acts improperly in the pursuit of benefits to ensure that the business operation without corruption, the Company has established an anti-corruption policy and practice guidelines<sup>1</sup> in order to be a practice guideline and used to communicate to the Board of Directors, The Chief Executive Officer, Management Committee and employees of all levels must strictly abide by, including prohibiting Directors, Executives and employees conduct or accept any kind of corruption, either directly or indirectly, covering all relevant departments. The Company will regularly review the implementation of the anti-corruption policy and practice as well as the practice guidelines and requirements for operating various areas in line with changes in business, regulations and legal requirements.

### **3.9 Whistle blowing measures**

The Board of Directors provide opportunities for employees of the Company and stakeholders a channel for receiving whistleblowing, complaints or expressing opinions, suggestions to show how

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<sup>1</sup> Please see documentation for details. "Anti-Corruption Policy and Guidelines" approved by the Board of Directors

stakeholders are affected, report a whistleblowing of illegal conduct or any issues on the Code of Conduct directly to the Chairman of the Board of Directors of Thantawan Industry Public Company Limited through the following channels;

1. By mail, Chairman of the Board of Directors or Chairman of the Audit Committee,  
Tantawan Industry Public Company Limited  
No. 123 Sun Tower Building 32, Vibhavadi Rangsit Road,  
Chomphon Subdistrict, Chatuchak District, Bangkok 10900
2. Email to the Chairman of the Board of Directors and Chairman of the Audit Committee  
board-thip@thantawan.com
3. Company website: www.thantawan.com
4. Suggestion box / comments / complaints within the Company. (The person who in charge is Chief Executive Officer)

In this regard, the company will conduct the examination according to the procedure and record the investigation in writing. Without disclosing the name of the whistleblower including the collection of complaints to protect the impact May occur with those who report such clues

#### **Part 4 Investor Relation**

- 1) Conduct duties with integrity and professional manner.
- 2) Disclose effectively to ensure that all stakeholders receive accurate timely and precise information on equal basis.
- 3) Ensure that relevant stakeholders are able to access and inquire for necessary information.
- 4) Confidential information and any inside information for personal benefits are strictly prohibited.
- 5) Conduct knowledge regularly with development and effectiveness.
- 6) Silent period or analyst for 10 calendar days, prior to the announcement date.
- 7) Investor relations officer is prohibited to trade the Company stock for 10 days (calendar), prior to the announcement date until 1 calendar day after the announcement date of operations result.

#### **Effective Date**

This Code of Conduct will be effective from February 1, 2021 onward and cancel the Code of Conduct dated November 28, 2018.

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