

**CODE OF CONDUCT**  
**2023**

AMATA VN PUBLIC COMPANY LIMITED

# CONTENTS

<b>Topic</b>	<b>Page</b>
<b>Definitions</b>	1
<b>1. Message from the Chairman of the Board and the CEO</b>	3
<b>2. Code of Conduct in Conducting Business</b>	
2.1 Business Operating Guidelines	4
2.2 Anti-Corruption Policy	5
2.3 Whistleblowing Policy	19
2.4 Conflict of Interest Policy	31
<b>3. Code of Conduct for the Board of Directors</b>	40
<b>4. Business Ethics Towards Stakeholders</b>	
4.1 Policy on the Treatment of the Community, Society and the Environment	40
4.2 Policy on the Treatment of Shareholders	42
4.3 Policy on the Treatment of Company Staff	43
4.4 Policy on the Treatment of Customers/Clients	44
4.5 Policy on the Treatment of the Process in Sourcing of Goods and Materials and on the Treatment of Business Partners/Operators	45
4.6 Policy on the Treatment of Trade Competitors	47
4.7 Policy on Workplace Safety and Hygiene	47
4.8 Policy on Staff Compensation and Welfare Benefits	48
4.9 Policy on Human Resources Development	50
4.10 Policy on Non-Violation of Human Rights	51
4.11 Policy and Operating Guidelines on the Treatment of Creditors	52
4.12 Policy and Operating Guidelines on Non-Infringement of Intellectual Property (IP) Rights	53
4.13 Policy on Corporate Social Responsibility	54
4.14 Policy on Operating the Business within the Environmental Standards	55
4.15 Policy on Promoting Effective and Efficient Use of Resources	56

<b>5. Code of Conduct for the Company's Staff</b>	
5.1 Self-Treatment	57
5.2 Treatment of Customers/Clients, Other Involved Parties, and the wider Society	57
5.3 Treatment and Actions among Staff Members	57
5.4 Treatment of the Organization	58
<b>6. Oversight of Compliance with and Review of the Code of Conduct</b>	65
<i>Form for use in acknowledging and confirming agreement to act in full compliance with Amata VN PCL.'s "Code of Conduct in Conducting Business Handbook"</i>	66

**Definitions**

Executive Directors	Board Directors, who are also appointed as an Executive of the company in which they are appointed as a Board Director.
Non-Executive Directors	Board Directors, who are not concurrently in any Executive position in the company in which they are appointed as a Board Director. Non-Executive Directors may be selected and appointed through a process in accordance with the established corporate Nominations Policy and Procedures, as well as may be a representative of a Shareholder Group.
Independent Directors	Board Directors who are not Executives in the Company in which they are appointed as a Board Director, and who possess the required 'Independence' qualifications specified by the Office of the Securities Exchange Commission (SEC).
Corruption	Actions in various forms based on position unlawful or immoral duties and powers including both direct and indirect bribery. Whether in any form, such as accepting, demanding, soliciting, including giving, offering, promising to give property or benefit other government officers or private agencies together with the hope of persuading them to commit or omit certain acts that are unjustified by their duties in order to obtain the benefit of the business itself or those involved unfairly and cause damage to the interests of others. Unless in the case of laws, rules, regulations, local traditions or trade customs that allow this to be done.
Bribery	Offering, promising, accepting or providing an incentive to commit an unlawful act, breach of business ethics, breach of trust or create an unfair advantage, In this regards, the incentives may be in the form of gifts, loans, fees, rewards or other benefits such as taxes, services, donations, contributions, etc.
Charitable Contribution	Giving money, things or anything else of value to an entity or charitable organization, for the public without expecting a return.

Support	Money, things or any other benefits given or received from customers, partners, business alliances with the propose of business, brand, image or reputation of the Company.
Political Contributions	Financial and non-monetary assistance and support to politicians, political parties or people related to politics such as money, workforces, places, equipment, other facilities, etc.
Gift	Money, assets, things, services, privileges or any other benefits in both monetary and non-monetary forms that individuals give and/or receive on occasions in addition to salary, earnings, and benefits from normal employment.
Conflict of interests	Situations or actions in which Directors, Executives or Employees demand personal benefits and those involved, whether by blood or any other means, which affects fair decision-making performing duties according to responsibilities and consider to the common interests of the Company.
Facilitating Payment	Unofficial expenses paid to government officers, to speed up a process or spur action including enabling the payer to receive special privileges from superior service than others.
Ethics/Moral Principles	The principles held in high esteem by other people or society as a whole, which help and form a basis for making any decisions and for behaving in a personal capacity.
Ethical Behaviors	Positive ethical behaviors, based on popular or accepted traditions and special festivals/events; or various activities relating to any important long-held social customs and traditions.

## 1. Message from the Chairman of the Board and the CEO

AMATA VN PCL has and upholds the principle of operating its businesses with good moral principles and standards, through being committed to being responsible and fully accountable to all Stakeholders, giving importance and being committed to conducting the Company's business in a fully transparent and honest manner together with strictly adhering to all legal and regulatory requirements in accordance with the principles of good governance and good business ethics. As such, the required uniform standards of behavior, on the part of all Company Staff together with all Board of Directors and Members of the Management Group, have been defined in regards to conducting its businesses and their behavior within the framework of acting with good moral standards, honesty and integrity. The Company recognizes that, apart from the negative effects on its business operations, its reputation and its corporate image, fraudulent actions and acts of corruption will also be a major obstacle for the Company's sustainable growth as well as for the overall development of the country.

In its capacity as a business operator and part of the wider society, as well as in the hope of Thailand being rid of corruption, the Company joined the Private Sector Collective Coalition Against Corruption (or the CAC) in fighting all forms of corruption; and also established its 'Anti-Corruption Policy and Measures' that is one of the core components of the Company's "Code of Conduct in Conducting the Business", which are operating guidelines that must be adhered to by all Company Staff in undertaking their activities, and also for informing all involved Stakeholders about the Company's overall intent and business operating framework.

On behalf of the Company's Board of Directors and Executives, all Board Directors, Members of the Executive and Management Group and Company Staff, at all levels, are requested to study and achieve a full understanding of this "Code of Conduct in Conducting the Business", and to act in strict accordance with this Code of Conduct. This is so that we can all join together in developing the Company into a transparent organization, so as to receive the full trust and confidence from all Stakeholder groups; whereby this will be a core foundation for the Company's business operations together with its ongoing sustainable growth.

Dr. Apichart Chinwanno  
Chairman of the Board

23 February 2024

Mrs. Somhatai Panichewa  
Director and CEO

23 February 2024

## 2. Code of Conduct in Conducting Business

### 2.1 Business Operations Guidelines

The Company's Board of Directors promotes the creation of business sustainability and maintaining overall benefits for all Stakeholders and society as a whole, as well as fully supports allowing all Stakeholders the opportunity to express their opinions or comments regarding the business operations undertaken by the Company. This will be a mechanism and procedure to oversee that business activities are being undertaken in a genuine manner, in order to drive the organization in achieving real and effective good corporate governance practices, through having in place these core principles and procedures:

- 1) Strictly adhering to all associated and applicable rules and regulations,
- 2) Complying to the Company's established policies relating to: "Corporate Governance" and "Code of Business Ethics",
- 3) Being committed to conduct and operate its businesses in a fully transparent, honest and equitable manner,
- 4) Adhering to the principles of acting as 'good corporate citizen' through instilling positive awareness and mindfulness into its employees and Staff,
- 5) Taking into consideration both the overall benefits and possible negative effects, resulting from the Company's business operations for society as a whole and for all Stakeholders in an equal and equitable manner,
- 6) Operating its businesses in a responsible manner, together with protecting and maintaining the overall benefits for all Stakeholders and society as a whole,
- 7) Establishing and implementing stringent operating systems and procedures, so as to prevent any possible fraudulent or corrupt actions from occurring without being detected by the Internal Audit process,
- 8) Requiring all Board Directors, Executives and Management group members together with all Staff members within the organization to actively participate in undertaking anti-corruption practices, in reporting any conflict of interests situations, in communicating in an effective and efficient manner, and in promoting the quality of their working lives,
- 9) Allowing all Stakeholders the opportunity to make use of effective channels of communications to propose or submit any complaints, information and suggestions; as well as genuinely listening to such inputs and opinions together with having in place various measures to protect any complainants or informants/whistle-blowers.



## Anti-Corruption Policy

Amata VN Public Company Limited is well aware that corruption not only affects to the business operations but reputation and image of the Company. It is also a great obstacle to the sustainable growth of the organization and the development of the nation. Amata VN Public Company Limited, associated companies, subsidiaries and affiliates (the Company) are strictly adhere to relevant rules and regulations and adhere to conducting business with honesty, transparency, morality, ethics and responsibility to stakeholders along with the guidelines that are consistent with the principles of good corporate governance and the Company's business ethics which defines the scope of behavior standards that all employees of the company including Directors, Executives and Employees should act in business operations and performance as well as encouraging stakeholders throughout the supply chain to operate in the same direction to create a good business environment which is an important foundation for sustainable business operations.

To achieving such results in a tangible way, the Company therefore shows its intention to be a Collective Action Coalition against Corruption in Private Sector and cooperates with all sectors both domestically and internationally to create transparent, fair and against all forms of corruption (zero-tolerance) business standards by establishing an "Anti-Corruption Policy" as a guideline for all employees to adhere in the same way under the framework of ethics and honesty as well as relevant stakeholders to acknowledge the Company's intentions and business practices.

### DEFINITION

**Corruption** refers to actions in various forms based on position unlawful or immoral duties and powers including both direct and indirect bribery. Whether in any form, such as accepting, demanding, soliciting, including giving, offering, promising to give property or benefit other government officers or private agencies together with the hope of persuading them to commit or omit certain acts that are unjustified by their duties in order to obtain the benefit of the business itself or those involved unfairly and cause damage to the interests of others. Unless in the case of laws, rules, regulations, local traditions or trade customs that allow this to be done.

**Bribery** refers to offering, promising, accepting or providing an incentive to commit an unlawful act, breach of business ethics, breach of trust or create an unfair advantage. In this regards, the incentives may be in the form of gifts, loans, fees, rewards or other benefits such as taxes, services, donations, contributions, etc.



**Charitable Contribution** refers to giving money, things or anything else of value to an entity or charitable organization, for the public without expecting a return.

**Support** refers to money, things or any other benefits given or received from customers, partners, business alliances with the purpose of business, brand, image or reputation of the Company.

**Political Contributions** refers to financial and non-monetary assistance and support to politicians, political parties or people related to politics such as money, workforces, places, equipment, other facilities, etc.

**Gift** refers to money, assets, things, services, privileges or any other benefits in both monetary and non-monetary forms that individuals give and/or receive on occasions in addition to salary, earnings and benefits from normal employment.

**Conflict of Interest** refers to situations or actions in which Directors, Executives or Employees demand personal benefits and those involved, whether by blood or any other means. which affects fair decision-making performing duties according to responsibilities and consider to the common interests of the Company.

**Facilitating Payment** refers to unofficial expenses paid to government officers, to speed up a process or spur action including enabling the payer to receive special privileges from superior service than others.

## **GUIDELINES**

The Company's Directors, Executives and Employees are prohibited from soliciting, engaging in or accepting corruption in any country and all departments in both public and private sectors in which the company's business is involved, by jointly promoting the values of honesty and responsibility as corporate culture.

The Anti-corruption policy covers the company's operations in the following matters:

- 1) The Company conducts its business with integrity and transparency and not allow or accept bribes from any person both inside and outside. In this regard, to collaborate with government officers must be in accordance with the law, related policies and guidelines.
- 2) The Company complies with laws, rules, regulations, standards, policies and guidelines. including business ethics. It must not involve directly or indirectly in all forms of fraud and corruption (zero-tolerance).

- 3) The Company arranges regular assessment and management of corruption risks including creating guidelines for mitigating impacts consistent with the risks and in accordance with the internal control system.
- 4) The Company defines practical procedures, preventive measures and measures to prevent corruption in business operations that are comprehensive and sufficient for implementation.
- 5) The Company provides orientation and training for employees and relevant stakeholders to create knowledge and understanding about the policy, measures and procedures.
- 6) The Company defines a process for conducting ethics and supervising compliance with rules (Ethic & Compliance Program), internal control system and the internal audit process to meet the requirements of regulations and standards appropriately, sufficiency and consistency as well as covering the process of record data of financial, accounting, marketing, sales, purchasing, personnel management and other processes related to the operations of the Company.
- 7) The Company provides a reporting, monitoring and reviewing the effectiveness of anti-corruption policy implementation including urgent issues encountered regularly and in a timely manner with appropriate procedures and actions.
- 8) The Company provides channels and processes for receiving complaints or whistleblowing that are appropriate and safe for the Company's employees and stakeholders who wish to seek for advice, suggestions or complaints about corruption including measures to protect whistleblowers, complainants, witnesses and information reporters.
- 9) The Company provides communication and promote awareness of anti-fraud and corruption among employees, customers, and business partners, including subsidiaries, affiliates, other companies which the Company has control and business representatives as well as external stakeholders throughout the supply chain.
- 10) The Company supports exchange knowledge and experience, and cooperate with private sector organizations, government sector and civil society both domestically and internationally against corruption.
- 11) All employees operate without or allow others to use their authority in their position to claim, negotiate, contract or take any action directly or indirectly that leads to corruption.

## **Responsibilities**

To ensure that the anti-corruption policy will be implemented throughout the organization and there is a clear oversight. The Company therefore defines the duties and responsibilities of persons or units within the organization as follows:

### Board of Directors

- 1) Arrange anti-corruption policies and measures that suitable to the current environment and risk factors. It should be reviewed at least once a year.
- 2) Arrange to determine the scope of anti-corruption measures that are sufficient to support and supervise the Company to take action in the connection of such measures.
- 3) Supervise business operations to comply with laws, rules, regulations, policies and relevant guidelines as well as promoting the implementation of this policy in a concrete manner.
- 4) Encourage the Management to assess the risk of corruption and allocate resources to ensure the effectiveness of risk control appropriately and adequately.
- 5) Consider reports on the anti-corruption policies and measures implementation and provide useful suggestions to the Management for development and improvement.
- 6) Consider urgent issues related to corruption to supervise the operation in a timely manner.
- 7) Avoid any activity that might lead to that situation or any suggestions that will cause a violation of this policy.
- 8) Encourage and support the Management to be aware and emphasize the prevention of conflicts of interest and integrate into the corporate culture.

### Audit Committee

- 1) Supervise and review the internal control system, internal audit and corruption risk assessment to be efficient and effective.

- 2) Consider reports on the implementation of anti-corruption policies and measures.
- 3) Consider urgent issues related to corruption to supervise the operation in a timely manner.
- 4) Provide channels and processes that is appropriate and safe for whistleblowing or receiving complaints, including protection measures for whistleblowers, complainants, witnesses and information reporters.

#### Corporate Governance Committee

- 1) Develop and improve anti-corruption policies and measures.
- 2) Encourage related parties to take action and comply with the scope of anti-corruption measures set by the Board of Directors.
- 3) Provide all parties with knowledge and advice on the correct, complete and clear anti-corruption policy and measures.

#### The Management

- 1) Provide procedures and anti-corruption measures that are in accordance with the policy, regulations and the laws of the country in which the business operates.
- 2) Setup an internal control system, internal audit including efficient and adequate risk management of anti-corruption.
- 3) Establish an organizational structure with roles and responsibilities clearly as well as allocate appropriate and sufficient resources to be effective in controlling the risk of corruption.
- 4) Propose urgent issues related to corruption (if any) to the Audit Committee and the Board of Directors.
- 5) Encourage subordinates at all levels aware to the importance of compliance with the anti-corruption policy and measures and integrate as a culture of anti-corruption in all forms.
- 6) Follow up, manage and encourage compliance with relevant laws, policies, measures and regulations.

- 7) Report the results of auditing compliance with the anti-corruption policy and measures to the Audit Committee. and the Board of Directors regularly acknowledge
- 8) Protect subordinates and relevant stakeholders who reject corruption even that action will cause the company to lose business opportunities.
- 9) Act as a good role model by avoiding any activity that could lead to a situation or any suggestions that will cause a policy violation.

#### Human Resources and Administration Department

- 1) Provide personnel management processes that reflect the Company's commitment to compliance with the anti-corruption policy and measures.
- 2) Communicate the anti-corruption policy and measures to relevant stakeholders thoroughly.
- 3) Follow up and file an Acknowledgment and comply with the anti-corruption measures Form signed by the Company's employees.

#### Internal Auditor / Compliance Unit

- 1) Assess and manage fraud and corruption risks as well as setup guidelines for prevention and mitigation for high-risk cases.
- 2) Define plans, procedures, and preventive measures related to corruption that covers to the process of reporting urgent issues to the Executives and the Board of Directors.
- 3) Setup a due diligence process for anti-fraud and corruption operations in projects and business activities for both the Company and stakeholders throughout the supply chain (supply chain due diligence) and business partners
- 4) Setup Ethic & Compliance Program procedures and internal controls that are appropriate and adequate to the risk of fraud and corruption that may occur.
- 5) Review the internal control system and internal auditing on corruption as well as inform and follow up with relevant agencies to make improvements regularly.
- 6) Collect and prepare reports on audit results and compliance with anti-corruption policies and measures to report to the Audit Committee.

- 7) Provide advice on anti-corruption policies and measures as well as coordinating or discussing with other departments that may be involved in providing accurate complete and clear advice.

Company Secretary

- 1) Coordinate and exchange knowledge with other departments to integrate and develop information with anti-corruption work.
- 2) Coordinate and communicate the scope of measures set by the Board of Directors for relevant departments to implement.
- 3) Provide information and advice on the anti-corruption policy and measures to the Board and appointed external experts.
- 4) Regularly arrange an agenda for considering the performance according to the anti-corruption policy and measures in the Board of Directors' meeting.

Chief Executive Officer

- 1) Promote and support anti-corruption policies.
- 2) Operate in good faith.
- 3) Avoid actions that may cause violations of the anti-corruption policy, business ethics and against the law.
- 4) Act as a good role model in compliance with policies, measures, principles of corporate governance and business ethics.
- 5) Raise awareness and foster a culture of anti-corruption by continuously communicating to employees at all levels and relevant stakeholders.

Employees

- 1) Learn and understand roles, duties and responsibilities of corruption risk management related to their work.
- 2) Investigate, prevent and report bribery and corruption behaviors.

- 3) Comply with the anti-corruption policy and measures, including principles of good corporate governance, business ethics and other related practices by avoiding any activity that may lead to that situation or any suggestions that would cause a violation of that policy

## **PRACTICAL MEASURES**

The Anti-Corruption measures have been established as an important guideline to prevent potential corruption risks. The Company must conduct a review, check and evaluate the effectiveness of action measures. Directors, Executives and Employees of the Company must perform their duties with prudence and caution in the following issues:

- 1) Receiving and giving gifts, welcome service or other benefits

Receiving and giving gifts, welcome service, gratuities and hospitality or any other benefits are permitted in which the value of the gift or gratuities must not exceed the limits required by law in that country and inform the stakeholders of the practical measures as well as having regular control and inspection mechanisms. To accepting and giving gifts must have the following characteristics:

- 1.1) Proceed correctly, openly, transparently, not against moral principles and obey the law, the Company regulations, including government agencies, state enterprises and other related agencies.
- 1.2) Suitable for the situation, festivals and traditions events.
- 1.3) Does not used as an excuse or a means of corruption.
- 1.4) Does not cause conflicts between personal interests and the interests of the Company.
- 1.5) Does not accept or give gifts, welcome service or other benefits in the case that those actions will affect the operations of the Company.
- 1.6) A record or register must be prepared to control the receipt or giving of gifts by specifying the purpose and person's name agencies who received or giving gift, gift value and approver clearly.



## 2) Charitable Contribution and Support

Support money, charitable donations or all kinds of support money are considered as part of social contribution activities to enhance a good image and align to the Company's objectives which must be done transparently through defined process under a strict disbursement control. The donation and support must have the following characteristics:

- 2.1) Proceed correctly, openly, transparency, not contrary to moral principles and obey the law, the Company regulations, including government agencies State enterprises and other related agencies.
- 2.2) Consistent with social, community and environmental policies or activities to promote sustainable development of the Company or is an activity that benefits to the society.
- 2.3) Does not used as an excuse or a means of corruption.
- 2.4) There are no hidden objectives to gain an advantage or create incentives for business benefits.
- 2.5) Does not cause conflicts between personal interests and the interests of the Company.
- 2.6) Prepare a record for approval by specifying the purpose and person's name, organizations that receive donations or receive support clearly with relevant documents attached, to propose to the authorized person of the Company for approval before taking action.
- 2.7) Monitors whether donations or sponsorships are used for their intended purpose.

## 3) Political Contributions and Activity

The Company provides transparent and verifiable political support without discriminating against or giving wrongful benefits to political parties or persons. Any action in connection with political activities must have the following characteristics:

- 3.1) Conducting business with political neutrality and has no policy to provide political assistance or to act in a way that is aligned with any political party or group.

- 3.2) Promote personal rights and freedoms of employees in accordance with the constitution and other related laws.
- 3.3) Employees are prohibited from using the Company's property or providing services on behalf of the Company to support political activities or take any action which leads to the understanding that the Company be affiliated with or support a political party or any political group.
- 3.4) Provide a review and audit process for political contributions.
- 3.5) Prepare a record for approval by specifying the purpose and person's name, sponsored agencies clearly with relevant documents attached, to propose to the authorized person of the Company for approval before taking action.

#### 4) Facilitating Payment

The Company does not have a policy to pay facilitation payments and does not accept any action in exchange for facilitation or creating an unfair advantage in business operations by doing the following:

- 4.1) Does not pay for convenience either directly or indirectly, or traditional payment or payment through other people, especially the payment to facilitate government officers.
- 4.2) Avoid or does not open for the opportunity to fall in a situation of facilitation payment.
- 4.3) Define procedures for approval and verification of facilitation payments.
- 4.4) Inform the supervisor when being asked for a facilitation payment to jointly find a solution.

#### 5) Employment of government officers (Revolving Door)

The Company must provide guidelines for auditing employment to prevent appointment or hiring Government officers of Thailand or any country that the Company operate its business that may lead to conflicts of interest and create fraud and corruption risks, by doing the following:

- 5.1) Does not appoint or hire Government officers of Thailand or any country that the Company operate its business who are still in position, except state enterprises that have requirements from agencies to be able to have representatives from state enterprises to work in the organization. Unless there is a reasonable cause.
- 5.2) Appointing or hiring former Government officers of Thailand or any country that the Company operate its business who retired for not less than 2 years. Unless there is a reasonable cause.
- 5.3) Provide a due diligence process for the person whom the Company will nominate to be a Directors, consultants and Executives of the Company as well as establishing guidelines to prevent conflicts of interest.
- 5.4) Establish appropriate hiring criteria including measures to disclose names and backgrounds of persons who are former government officers to be appointed or employed as personnel of the Company.

6) Recording and preservation process

Recording process and maintain the accounting and financial information of the Company must be accurate, complete, transparent and verifiable, with an internal control system and internal auditing that is efficient and reliable under the supervision of the Audit Committee. The guidelines for recording and keeping information will be in accordance with the code of conduct and corporate governance policies, relevant announcements, regulations and policies.

7) Human Resource Management

Provide a human resource management process that reflects the commitment to the implementation of the anti-corruption policy and measures which covering to recruitment, selection, training, performance appraisal, transfer, promotion, compensation and benefits in various forms, termination of employment and retirement.

## 8) Communication and Training

### 8.1) Communication

8.1.1 Arrange for the communication of anti-corruption policies and measures to those involved in acknowledgment, consisting of Directors, Executives, Employees, subsidiaries, associated companies, other companies which the Company has control, business representatives and trading partners as well as evaluating the effectiveness and integrate the results to improve continuously.

8.1.2 Arrange for the communication of penalties in case that non-compliance with the anti-corruption policy and measures, including communicating the policy on not demoting, penalizing, or giving negative effects to Directors, Executives, and Employees who reject corruption even such actions will cause the Company to lose business opportunities to Directors, Executives and Employees.

8.1.3 Arrange disclosure of information about anti-corruption policies and measures to a public.

In this regard, to prepare or revise relevant policies and measures, there must be communication and disclosure of information through appropriate communication channels such as letters, e-mail, websites, publications, publicity plaques, etc.

### 8.2) Training

8.2.1 Provide orientation and training on anti-corruption policies and measures for Directors, Executives and Employees at all levels regularly.

8.2.2 Encourage Directors and Executives to participate in raising awareness among Employees to be a good role model in compliance with the anti-corruption policy and measures.

### 8.3) Getting Advice

In case that Directors, Executives, Employees or stakeholders have queries about the anti-corruption policy and measures. They can inquire or obtain preliminary advice via:

- Company Secretary and Legal Department

telephone: (02) 792-0000

Tel: (02) 792-0000

Email: [cs@amata.com](mailto:cs@amata.com)

post office: Company Secretary and Legal Department  
Amata VN Public Company Limited  
2126 Kromadit Building, 2nd floor  
New Phetchaburi Road, Huai Khwang District  
Bangkok 10310

## **PENALTY**

Anti-corruption Policy consider to be a part of work discipline. Directors, Executives and Employees who fail to comply will be investigated and subject to disciplinary action in accordance with the Company's regulations, charter and related laws. This may include termination of employment. In the event of an investigation, all employees must cooperate fully with internal and external agencies.

In the same time, the company will not demote, penalize or have a negative effect on the Director, Executives and Employees who refuse to act with the intention of violating this policy even if that action will cause the company to lose business opportunities.

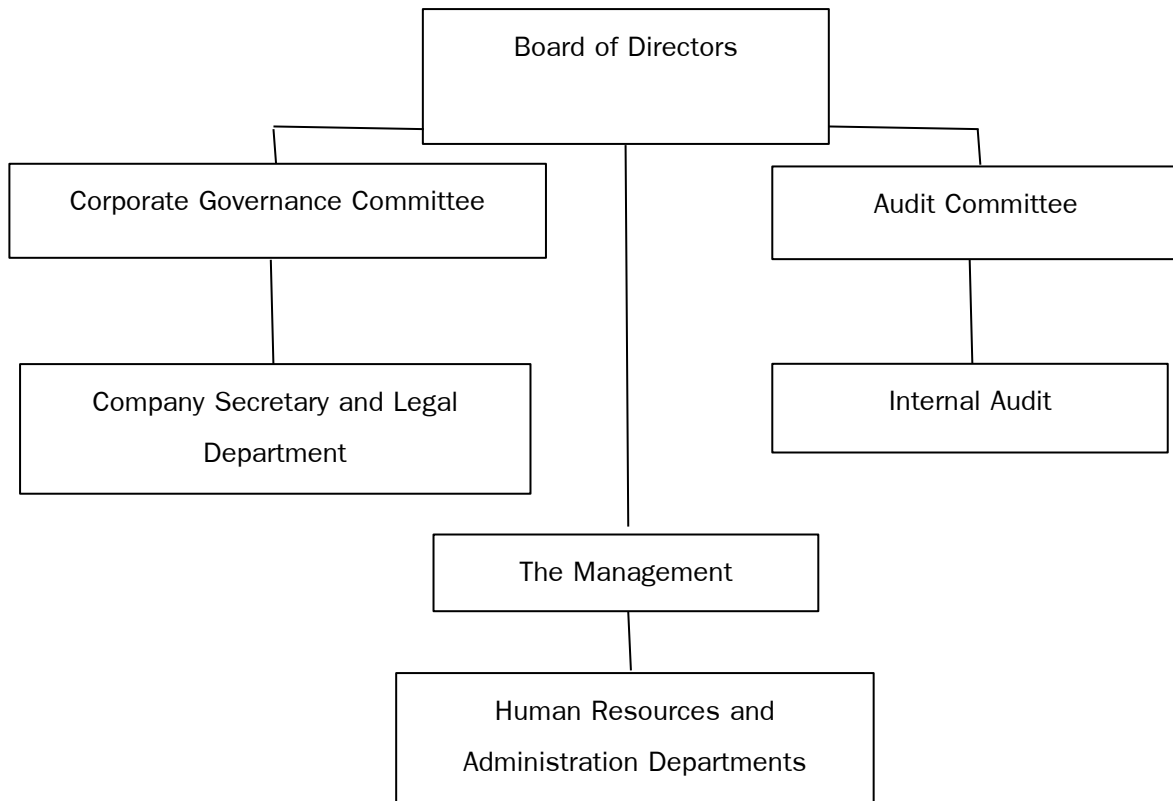
It is hereby announced for acknowledgment and general practice.

Announced on 13 September 2023

(Dr. Apichart Chinwanno)

Chairman

### ANTI-CORRUPTION RESPONSIBILITY STRUCTURE



#### SCOPE OF APPLICATION

Scope of this policy application shall apply to all Directors, Executives and Employees of the Company.

#### IMPLEMENTATION OF MEASURES BY INDIVIDUALS AND RELATED COMPANIES

Amata VN Public Company Limited encourages subsidiaries, associated companies, affiliates Joint Ventures, Joint Ventures and Business Partners to implement the Anti-Corruption Policy as a Guideline.

## Whistle Blowing Policy

Amata VN Public Company Limited, associated companies, subsidiaries and affiliates (the Company) are well aware that providing channels for complaints and listening to opinions helps employees and stakeholders participate in improvement and development of the Company operation. It is also an important mechanism to prevent fraud and corruption effectively. The Company is committed to conducting business honestly, transparently and treating stakeholders fairly, thus creating this policy to allow stakeholders both inside and outside the organization to report or provide information about the Company's business operations that may lead to the risk of unlawful acts, regulations, policies, principles of corporate governance and business ethics of the Company. It is also an important mechanism for surveilling, monitoring and improving operational efficiency to build confidence and trust among stakeholders.

### DEFINITION

**Whistleblowing or Complaints** refers to the disclosure, reporting or provision of information and evidence by a person in good faith concerning illegal, irregular, dangerous, or unethical practices and the Company's Code of Conduct.

**Whistleblower or Complainant** refers to Directors, Executives and Employees of the Company including other stakeholders who disclose information, make complaints or report clues in good faith about misconduct or acts that violate laws, regulations, policies and the Company's Code of Conduct.

**Respondent or Accused** refers to Directors, Executives and Employees of the Company who receive complaints or whistleblowing with evidence pointing out that they committed an offense or behaved that violates laws, regulations, policies and the Company's Code of Conduct.

### GUIDELINES

#### Scope of whistleblowing

Directors, Executives, Employees, partners, alliances and stakeholders ("Complainant" or "Whistleblower") can file a complaint about wrongdoing or acts that violate the law, regulations and business ethics of the Company through the whistleblowing channels specified on various issues as follows:



- (1) Any action that is seeking for benefits that should not be legitimate which includes embezzlement, corruption and bribery.
- (2) Fraudulent behavior or finishing financial statements intentionally to deceiving others by displaying false statements or conceal the true message which should have been told.
- (3) Behavior related to transactions that violate laws, rules and regulations of the Company and business ethics.
- (4) Suspicious activities related to money laundering, accounting, finance, procurement or any misconduct that results in damage to the Company's property and reputation.
- (5) Actions that are in conflict with the Company's interests.
- (6) Behavior related to discrimination violation of human rights, unethical or immoral.

#### **Methods for reporting clues or complaints**

Complainants or whistleblowers wishing to report clues or complain about misconduct as specified in the scope of whistleblowing above with good faith intentions can be done by doing the following:

- (1) Inform the name, address and contact details of the complainant or whistleblower.
- (2) State the name of the offender and details of the offense together with evidence that is sufficient for examination (if any) according to the whistleblowing form attached to this policy.
- (3) Complainants or whistleblowers can choose to remain anonymous and not disclose contact information in case that they may have self-impact. In this regard, the complainant or whistleblower must present reasons and reliable evidence regarding the impact that will occur.

#### **Company whistleblowing channels**

The Company provides independent channels for complaints or whistleblowing which is secure and easily accessible to both internal and external stakeholders. In this regard, complainants or whistleblowers can report clues or file complaints through the following channels:

- Chairman of the Board of Directors  
telephone: (02) 792-0000  
Email: [whistleblowing@amata.com](mailto:whistleblowing@amata.com)  
post office: Chairman of the Board  
Amata VN Public Company Limited  
PO Box 7, Monterey Tower Post Office, Bangkok 10310
  
- Chairman of the Audit Committee  
telephone: (02) 792-0000  
Email: [whistleblowing@amata.com](mailto:whistleblowing@amata.com)  
post office: Chairman of the Audit Committee  
Amata VN Public Company Limited  
PO Box 7, Monterey Tower Post Office, Bangkok 10310
  
- Chairman of the Corporate Governance Committee  
telephone: (02) 792-0000  
Email: [whistleblowing@amata.com](mailto:whistleblowing@amata.com)  
post office: Chairman of the Corporate Governance Committee  
Amata VN Public Company Limited  
PO Box 7, Monterey Tower Post Office, Bangkok 10310
  
- Chief Executive Officer  
telephone: (02) 792-0000  
Email: [whistleblowing@amata.com](mailto:whistleblowing@amata.com)  
post office: Chief Executive Officer  
Amata VN Public Company Limited  
PO Box 7, Monterey Tower Post Office, Bangkok 10310
  
- Company Secretary  
telephone: (02) 792-0000  
Email: [cs@amata.com](mailto:cs@amata.com)  
post office: Company Secretary  
Amata VN Public Company Limited  
PO Box 7, Monterey Tower Post Office, Bangkok 10310

### **Applicable procedures**

The Company has set up specific applicable procedures to be undertaken in the event that any complaint or reports are received, as follows:

- 1) Complaint recipient is required to forward the information received to the coordinator, namely, the Head of the Compliance unit or Head of the Human Resources department to gathering the fact, process and filter information including consider the evidence documents and the severity or damage of the complained matter. In the case where the coordinator considers that complaints have well-grounds, they must be reported to the Audit Committee and proposed to the Corporate Governance Committee for acknowledgement.
- 2) The Audit Committee appoints a fact-finding working group to draw conclusions. In this regard, the fact-finding working group must not have any interest in the complaint.
- 3) In the case of executive level, supervisor level or department level and above including Chief Executive Officer or Director of the company being a respondent. The Board of Directors will appoint an investigation committee to act as appropriate.

### Timeline for undertaking investigation

- 1) Complaint recipients must collect information and submit complaints to the coordinator within 3 working days from the date of complaint receipt.
- 2) The coordinator must consider and report the results within 3 working days and present to the Audit Committee or the Board of Directors for approval to appoint an investigation committee to consider and summarize the complaint within 60 working days from the starts of investigation.
- 3) In the event that the investigation has not yet been completed, the investigation committee request for an extension for its ongoing investigations from the Audit Committee.

### Investigating the facts

- 1) Define investigation guidelines and conduct investigations with transparency, impartially and fairly without interference by anyone.

- 2) Collect evidence, filter the information and review documents to understand the facts. In the event that additional relevant information is required, the written consent of the complainant must be obtained.
- 3) Conduct investigations with objectivity and without prejudice including consider of the interests and reputation of the Accused, Complainant and the Company.

#### Judgement

Execute judgments with fairness, transparency and without prejudice. In this regard, after the decision, the guidelines are required as follows.

- 1) In the case that the complaint is examined and determined to be unfounded, the party or the accused has the right to choose to have the decision disclosed.
- 2) In the case that the complaint has been investigated and determined that the complaint is true. The investigation committee can resolve to punish the complainant and impose punishment as it deems appropriate.

#### Summarizing and reporting results

- 1) The coordinator collects and prepares a report to summarize the results of the complaints that have been settled and/or in the progress of investigating reports to whistleblowers, respondent, the Audit Committee or the Board of Directors and related parties continuously informed.
- 2) The coordinator gathers statistic information by clearly separating the issues of corruption and regularly report all complaint handling results to the Corporate Governance Committee or the Board of Directors or when there is an urgent case that must be reported immediately.
- 3) Disclosure information or results of whistleblowing or complaints to external stakeholders in the annual report or any other report must be approved by senior management or the Board of Directors

#### **Protection measures to protect those who inform or provide clues**

- 1) The Company provides protection and protect whistleblowers or complainants from being intimidated threatened or retaliated by any means unfairly.

- 2) The Company will not disclose the name or any other information that can identify the identity of the whistleblower or complainant including details of clues or facts of the incident to other people who are not involved unless it is a legal disclosure only.
- 3) The Company has guidelines for keeping information related to complaints and personal information to be kept confidential in both during and after the investigation.
- 4) The company will not terminate employment, suspend work, change job position, job description, change workplace or take disciplinary action against employees who inform, complain or report information without intention to provide false information.
- 5) Complainant or whistleblower can choose to remain anonymous in the case that the disclosure may cause damage to themselves. In this regard, the complainant or whistleblower must specify details, facts or evidence that convince and reasonable. However, to disclose the information will allow the Company to report progress or alleviate damage more quickly and conveniently.
- 6) In the event that the complainants feel unsafe or damage may occur, the complainants can request the Company to set up appropriate protection.
- 7) The Company will mitigate damages to whistleblowers, affected persons or accused persons who are later proved innocent through appropriate and fair means.

#### **Protection of the complainant**

The company is fair and responsible to the complainant in which the information about the complainant will be kept confidential and will not be disclosed to anyone ahead of time in both during and after the investigation unless it is a legal disclosure. The investigation committee will give the accused an opportunity to clarify or appeal before making a decision on the complaint.

#### **Giving clues or making false complaints**

Complainants or whistleblowers who knowingly false disclose information with dishonest intentions to report and/or later proved to be an act with malicious intent, intentional damage to the complainant. In the case of employees, they will be subject to disciplinary action according to the Company's work regulations or as the Company deems appropriate. This may include legal action. In the case of outsiders which causes damage to the Company or tarnish its reputation. The Company will consider prosecuting according to the law.

## **Sentencing**

In the case that investigation results found that the accused is actually guilty or whistleblowers deliberately submit false statements. The coordinator shall present the matter together with opinions and determine guidelines for disciplinary action and prosecution according to relevant laws or as the Company deems appropriate and proposed to the authorized person for consideration and further action. In the case that the complainant uses influence or searches for information to seek for the identity of the whistleblower or take any other forms of retaliation. The Company may consider disciplinary action. This may include termination of employment against the respondent.

## **RESPONSIBILITIES**

To ensure that this policy will be implemented throughout the organization and there is a clear oversight. The Company therefore defines the duties and responsibilities of persons or units within the organization as follows:

### Board of Directors

- 1) Arrange whistleblowing policy that is appropriate to the business context and risk factors. It should be reviewed at least once a year or when there is an appropriate case.
- 2) Supervise business operations to comply with laws, rules, regulations, policies and relevant guidelines as well as promoting the implementation of this policy in a concrete manner.
- 3) Approve the operational process, channels for receiving complaints and protection measures for whistleblowers or complainants including disclose the result to the Company's stakeholders on a regular basis.

### The Management

- 1) Provide a process procedures and channels for receiving complaints including protection measures for whistleblowers, complainants, witnesses and information reporters as appropriate and in accordance with the policy regulations and the laws of the country in which the business operates.

- 2) Establish an organizational structure with roles and responsibilities clearly as well as allocate appropriate and sufficient resources.
- 3) Setup an internal control system, internal audit including transparent, efficient and adequate risk management of whistleblowing.
- 4) Communicate policies and measures including processes and channels for whistleblowing and receiving complaints to raise awareness among internal and external stakeholders.
- 5) Follow up, manage and encourage compliance with relevant laws, policies, measures and regulations as well as develop and improve guidelines to be more efficient.
- 6) Consider reporting the performance according to the policy before propose to the Board of Directors.

#### Related persons or entities

- 1) Define procedures related to receiving complaints and complaints management including protection measures for whistleblowers, complainants, witnesses and information reporters.
- 2) Define procedures and controls to prevent all forms of retaliation against whistleblowers or complainants who report potential misconduct including guidelines for appropriate remedies for the affected.
- 3) Define a process for disclosure and reporting of whistleblowing information and complaints management.
- 4) Assess and manage the risks related to complaints effectively.
- 5) Develop and review the internal control system, risk management and the audit process to investigate any policy violations to be efficient and concise including inform and follow up with relevant agencies to make improvements regularly.
- 6) Collect facts, process, filter information, investigate, review and make fair decisions as well as collect reports of complaints, manage and disclose information on complaints in accordance with regulatory requirements.
- 7) Coordinate and integrate cooperation with relevant departments to jointly define measures, management, mechanisms of control and solving problems.



- 8) Continuously communicate and raise awareness about whistleblowing among employees and relevant stakeholders.
- 9) Provide advice on preliminary policies including coordinating or discussing with other departments involved in providing advice accurate, complete and clear.
- 10) Report the results of policy implementation to the Board of Directors, Executives or relevant departments.
- 11) Review the whistleblowing policy to comply with the law, related regulations and guidelines.

#### Employee

- 1) Learn, understand and comply with relevant laws, rules, regulations, policies and standards.
- 2) Report information or complaints through the Company's whistleblowing channels when witness any committing an offense or committing an act that violates this policy.

### **COMMUNICATION and TRAINING**

The Company arranges for communication of the whistleblowing policy through training, orientation, meetings or activities in various forms that are appropriate for Directors, Executives, Employees, subsidiaries, associated companies, other companies in which the Company has control, business agents and partners including relevant stakeholders to acknowledge as well as assessing the effectiveness and continually improving.

### **PENALTY**

Whistleblowing Policy consider to be a part of work discipline. Directors, Executives and Employees who fail to comply will be investigated and subject to disciplinary action in accordance with the Company's regulations, charter and related laws. This may include termination of employment. In the event of an investigation, all employees must cooperate fully with internal and external agencies.

In the same time, the company will not demote, penalize or have a negative effect on the Director, Executives and Employees who refuse to act with the intention of violating this policy even if that action will cause the company to lose business opportunities.

It is hereby announced for acknowledgment and general practice.

Announced on 13 September 2023

(Dr. Apichart Chinwanno)

Chairman

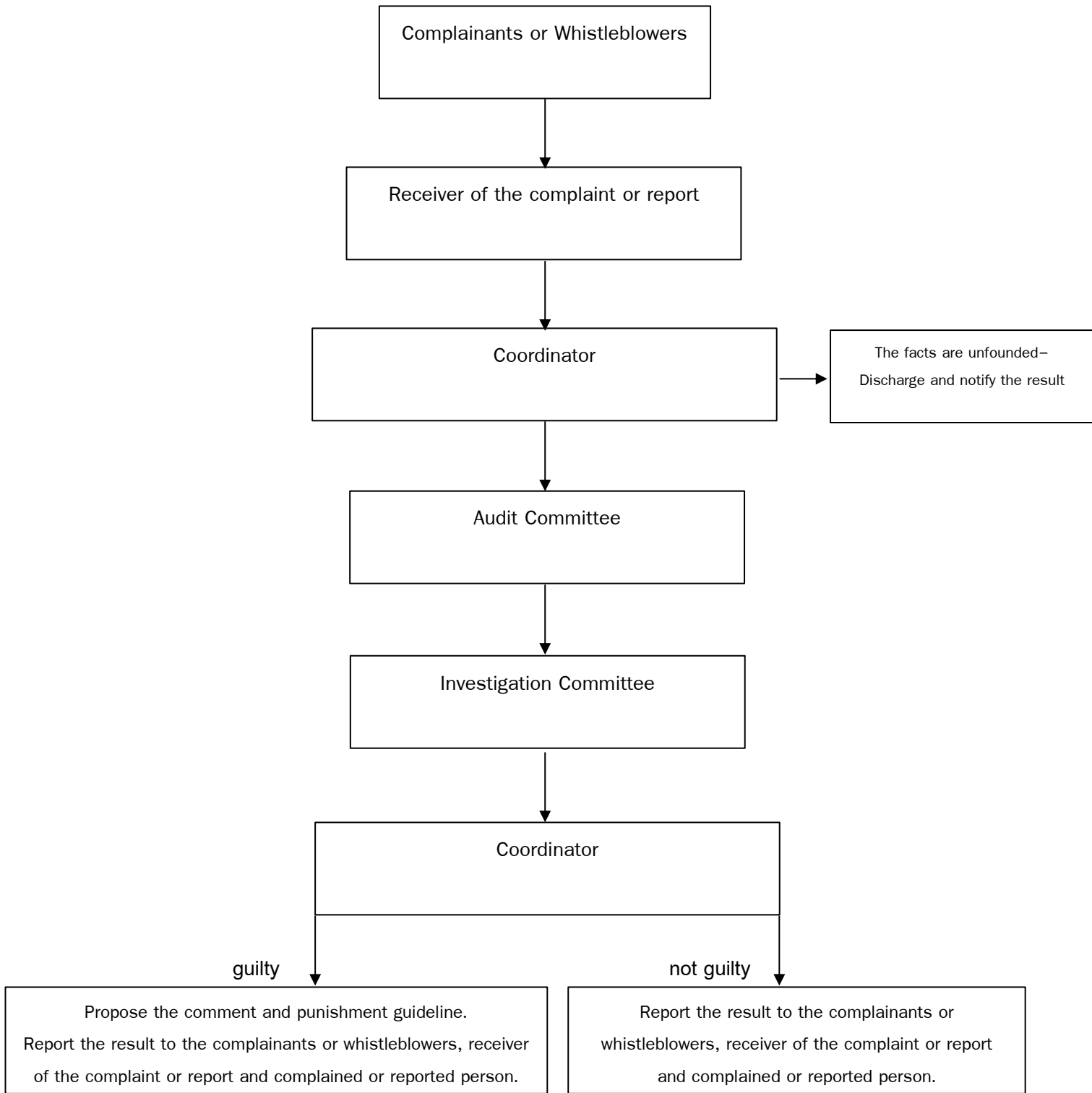
**Whistle Blowing Form**

Name-surname of the whistleblower	
Department	
Email	
Telephone	
Date of occurrence or receive information	
Location of the event	
Related department	
Associated person's name	
Event details	

**NOTE**

- In the case that the Company considers that the complaint has sufficient grounds, the complainants or whistleblowers will be contacted by the coordinator to inform the progress within the period specified in the whistleblowing policy.
- Those who choose to make complaints anonymously or not disclose the phone number will not be contacted back.
- Those who misrepresent or deliberately cause damage to others' reputation and credibility will be subject to disciplinary action and prosecution.

**DIAGRAM OF WHISTLEBLOWING PROCEDURE**



## Conflict of Interest Policy

Amata VN Public Company Limited, associated companies, subsidiaries and affiliates (the Company) are well aware that entering into the Company's business with connected persons may cause conflicts of interest. The Company is committed to conducting business with honesty, transparency and fairness to all stakeholders equally in accordance with the principles of good corporate governance and business ethics. To create added value and maintain maximum benefits for the organization in the long run to achieve such objectives Companies should consider conducting transactions based on the following principles:

1. It is a transaction that has passed a transparent approval process by directors and executives with responsibility, caution and honesty where stakeholders do not participate in decision-making.
2. It is a transaction made for the benefit of the Company as if it were a transaction with a third party.
3. There is a tracking and auditing system to ensure that transactions are done according to the correct procedures.

## DEFINITION

**Holding of securities** means holding rights in securities, convertible securities and derivatives according to the announcement of the Securities and Exchange Commission.

**Conflict of interest** refers to situations or actions in which directors, executives or employees have personal interests and those involved that affect to fair decision making, performing duties according to responsibilities and taking into common interests of the Company which can be divided into 9 forms as follows;

1. *Accepting Benefits* refers to receiving property, gift, premium, price reduction, entertainment, services, or other things of the same nature in which the receiving of improper benefits will affect to the decisions made by employees.

2. *Self-Dealing or Contract* refers to employees who have decision-making power to involve in the contract made with the agency they are affiliated with, by virtue of position and role, causing the affiliated agency to agree in contract to sell or hire from their own companies, relatives or associates.
3. Working after retirement or retirement (*Post-Employment*) refers to employees who resign from the company or retire to work in other competitor companies that operate the same business or related to the former agency that they had the power to control, supervise, by using their influence, relationship, or information to seek benefits for themselves.
4. Special work (*Outside Employment of Moonlighting*) can be referred to many circumstances, such as an employee setting up a company to conduct competitive business.
5. *Inside information* refers to a situation in which company employees take advantage of their knowledge of information within a department or organization and use that information to benefit themselves and their peers.
6. *Using your employer's property for private advantage* refers to employees who use company assets for their own benefit and their associates or use it for subordinates to do personal work.
7. *Pork belling* refers to senior management approves a company's social responsibility or public interest project to be held in their own area or hometown for political gain or the use of the Company's budget or items to distribute or subsidize to campaign for oneself.
8. The use of position to seek benefits for relatives or associates (*Nepotism*), or patronage, refers to the use of influence or authority by employees under their affiliation to enter into contracts or offer benefits to their own companies or their associates.
9. The use of influence to affect decision-making of employees or other departments (*Influence*) for the benefit of oneself or their associates, for instance, executives use their positions and powers to pressure and intimidate subordinates to stop auditing their company or their associates.

**Connected Person / Related Person** refers to Persons that may cause the Company's directors or executives to have conflicts of interest and affect fair decision-making in business operations whether for the benefit of that person or the best interest of the company as follows.

1. Director, Executive, Major shareholder, person having a controlling power over the Company, persons who will be nominated as directors or executives or controlling persons including related persons and close relatives of such persons.
2. Any legal entities in which the majority shareholders or persons having a controlling power fall into the category of persons as described in (1) above.
3. Any person whose behavior can be identified as acting on behalf of or under the influence of persons as described in (1) and (2) above.
4. Directors of any legal entities having a controlling power over the Company's businesses.
5. Spouse, child/children or adopted child/children, who are not yet of legal age, of the Directors as described in (4) above.
6. Any legal entities over which businesses those described in (4) and (5) have a controlling power.
7. Any person acting with the understanding or agreement that should the Company proceed with such transactions that provides financial benefits to such person, the following persons will receive financial benefits:
  - 7.1 Directors of the Company,
  - 7.2 Executives of the Company,
  - 7.3 Persons who having a controlling power over the Company's businesses,
  - 7.4 Directors of those parties who having a controlling power over the Company's businesses,
  - 7.5 Spouse, child/children or adopted child/children of the person as described in 7.1 to 7.4 above.

**Personal interest** refers to benefits in various forms in both monetary and non-monetary, that make the beneficiary party satisfied.

**Executive** refers to Chief Executive Officer or the first 4 executive positions after the Chief Executive Officer and all 4<sup>th</sup> equivalent positions, including positions in accounting or finance at the level of department manager or equivalent.



**Major Shareholders** refers to a shareholder, directly or indirectly, in any juristic person in excess of 10 percent of the voting shares of that juristic person.

**Connected transaction** refers to a transaction between the Company and the Company's connected person which is divided into 4 types as follows;

1. Normal business transactions are trading transactions relating to assets/services that are normal transactions of the Company, routinely performed and accordance to general trading conditions, such as trading of products, purchasing raw materials, providing services, etc.
2. Transactions relating to other assets or services.
3. Items of financial assistance to the Company, such as working capital in the form of loans collateral lending, etc., in which the Company must receive returns such as interest at market rates.
4. Connected transactions other than items in 1 to 3.

**Business opportunity** refers to a situation or environment conducive to the creation and conduct of business activities in order to seek benefits, profits or business competitive advantages.

## **GUIDELINES**

Directors, executives or employees must perform their duties carefully, honest and independent, comply with relevant laws, rules, regulations, criteria, policies and guidelines under the principles of good corporate governance and business ethics, consider for the best interests of the company to prevent conflicts of interest that may arise. The Company, therefore, sets the guidelines as follows.

1. Directors, Executives and Employees must not use personal needs and/or related persons to influence decision-making in the Company's operations.
2. Directors, Executives and Employees must not demand personally receive and/or offer money, property or any other remuneration from any person in connection with their work on behalf of the Company.

3. Directors, Executives and Employees must not use influence or their authority including allowing others to use or claim the power of their positions to seek benefits from the company.
4. Directors, Executives and Employees must not use their positions or authority influencing the decisions of employees or other departments for the benefit of themselves or those involved.
5. Directors, Executives and Employees must do not use the property and workforce of the Company including business opportunities to seek for personal benefits and/or those involved.
6. Directors, Executives and Employees must not bring confidential documents or insider information of the Company to disclose or use for personal benefit and/or related persons in both during the performance of duties and after leaving the position.
7. Directors, Executives and Employees must not express opinions or take any action that may affect the reputation and operations of the Company to third parties or the press whereby they have no authority in that matter.
8. Directors, Executives and Employees must work full-time according to the company's regulations. Doing any personal business must not affect the duties and working hours of the company.
9. Directors, Executives and Employees must not operate any business that may cause conflicts of interest or engage in a business that competes with the Company unless they are companies in the same group.
10. Directors, Executives and Employees should avoid or refrain from trading the securities of the Company and companies in the group during the period specified by the regulatory authority or when significant information that may affect the price of securities is known.
11. Directors, Executives and Employees must treat customers, business partners or competitors with equality, fairness and not favoring contract parties or competitors that will causing damage to the Company.
12. Directors or senior executives of the Company can hold directorship positions in other companies but must not affect the performance of their duties. In this regard, the

directorship must be reported and approved by the top management and/or the Board of Directors.

13. To enter into a connected transaction, it must be done in the same practice of making a transaction with a third party (arm's length basis) under general trading conditions and as a normal business transaction. In the case that it is not a normal business transaction, the Audit Committee is responsible for approving and complying with the rules set by the regulatory agency.
14. Directors, Executives and Employees must not engage in transactions with counterparties that are related to themselves and those involved even if it is for the benefit of the company.
15. Directors, Executives and Employees who have interests in which may affect to independent decision making should refrain from attending the meeting and voting on that agenda by informing the meeting in advance and record in the minutes of the meeting.
16. Directors, Executives and Employees must completely disclose their own interests and those involved that may lead to conflicts of interest in details annually or every time they change.

## **RESPONSIBILITIES**

To ensure that this policy will be implemented throughout the organization and there is a clear oversight. The Company therefore defines the duties and responsibilities of persons or units within the organization as follows:

### Board of Directors

- 1) Arrange conflict of interest policy that is appropriate to the business context and risk factors. It should be reviewed at least once a year or when there is an appropriate case.
- 2) Supervise business operations to comply with laws, rules, regulations, policies and relevant guidelines as well as promoting the implementation of this policy in a concrete manner.

- 3) Avoid any activity that might lead to that situation or any suggestions that will cause a violation of this policy.
- 4) Encourage and support the Management to be aware and emphasize the prevention of conflicts of interest and integrate into the corporate culture.

#### Audit Committee

- 1) Supervise and review connected transactions or significant transactions between the Company.
- 2) Consider the disclosure of the Company's information in case of connected transactions or transactions that may cause conflicts of interest to ensure accuracy and completeness.

#### The Management

- 1) Provide procedure criteria and prevention measure that are appropriate for each company's context as well as comply to policy, regulations and the laws of the country in which the business operates.
- 2) Establish an organizational structure with roles and responsibilities clearly as well as allocate appropriate and sufficient resources.
- 3) Setup an internal control system, internal audit including efficient and adequate risk management of conflicts of interest.
- 4) Act as a good role model by avoiding any activity that could lead to a situation or any suggestions that will cause a policy violation.
- 5) Encourage subordinates at all levels to be aware of the importance of policy compliance and integrate into the corporate culture.
- 6) Follow up, manage and encourage compliance with relevant laws, policies, measures and regulations as well as develop and improve guidelines to be more efficient.
- 7) Consider reporting the performance according to the policy before propose to the Board of Directors.
- 8) Provide channels for whistleblowing about conflicts of interest including protection measures for whistleblowers, complainants, witnesses and information reporters.

### Related persons or entities

- 1) Define procedures to deal with conflicts of interest including measures to prevent conflicts of interest that may occur.
- 2) Define a clear process for disclosure and reporting of conflicts of interest.
- 3) Assess and manage the risk of conflict of interest and setup guidelines for preventing and mitigating impacts.
- 4) Develop and review the internal control system, risk management and the audit process to investigate any policy violations to be efficient and concise including inform and follow up with relevant agencies to make improvements regularly.
- 5) Collect and file conflicts of interest reports as well as manage and disclose conflicts of interest information in accordance with regulatory requirements.
- 6) Coordinate and integrate cooperation with relevant departments to jointly define measures, management, mechanisms of control and solving problems.
- 7) Continuously communicate and raise awareness about conflicts of interest among employees and relevant stakeholders.
- 8) Provide advice on preliminary policies including coordinating or discussing with other departments involved in providing advice accurate, complete and clear.
- 9) Report the results of policy implementation to the Board of Directors, Executives or relevant departments.
- 10) Review the conflict of interest policy to comply with the law, related regulations and guidelines.

### Employee

- 1) Learn, understand and comply with relevant laws, rules, regulations, policies and standards.
- 2) Prepare conflict of interest disclosure report to supervisors in hierarchical order and deliver to the Chief Executive Officer.
- 3) Report information or complaints through the Company's whistleblowing channels when witness any committing an offense or committing an act that violates this policy.

**COMMUNICATION and TRAINING**

The Company arranges for communication of the conflict of interest policy through training, orientation, meetings or activities in various forms that are appropriate for Directors, Executives, Employees, subsidiaries, associated companies, other companies in which the Company has control, business agents and partners including relevant stakeholders to acknowledge as well as assessing the effectiveness and continually improving.

**WHISTLEBLOWING**

Any witnesses on action that is considered a violation of this policy shall report complain or giving clues in which the procedure is in accordance with the whistleblowing policy. However, complainants or whistleblowers will be protected and their information will be kept confidential without affecting the position and compensation in both during the investigation and after the completion of the process.

**PENALTY**

Conflict of Interest Policy consider to be a part of work discipline. Directors, Executives and Employees who fail to comply will be investigated and subject to disciplinary action in accordance with the Company's regulations, charter and related laws. This may include termination of employment. In the event of an investigation, all employees must cooperate fully with internal and external agencies.

In the same time, the company will not demote, penalize or have a negative effect on the Director, Executives and Employees who refuse to act with the intention of violating this policy even if that action will cause the company to lose business opportunities.

It is hereby announced for acknowledgment and general practice.

Announced on 13 September 2023

(Dr. Apichart Chinwanno)  
Chairman

### **3. Code of Conduct for the Board of Directors**

So as to underscore the Company's intent to conduct its businesses transparently with moral principles and integrity as well as to being responsible to all its Stakeholders in a professional manner, the Company has defined best practices guidelines for its Board of Directors, which are considered as the required business ethics in discharging their duties, as follows:

1. Undertake their duties and responsibilities in compliance with all applicable legal and regulatory requirements, as well as in accordance with the various Company regulations and resolutions of the Shareholders Meetings.
2. Manage the Company's business in an honest and politically neutral manner together with strict impartiality and full independence in regards to all decisions made and actions taken.
3. Delegate appropriate and full authority to the Management group for the day-to-day management and operations of the Company, free of any undue interference or detailed instructions - without any good reasons to do so.
4. Have no personal vested interests in the business activities of the Company or in any other businesses that compete with the Company whatsoever - whether directly or indirectly.
5. Avoid any situations of conflict of interests between those of the Company and their personal interests, in order to achieve overall maximum management effectiveness.
6. Undertake the management of the Company with all due care and without creating any personal obligations, that may later conflict with their required duties and responsibilities.
7. Not to seek any improper personal benefits, whether directly or indirectly, in working for the Company.
8. Discharge their duties to the fullest of their ability, in order to achieve maximum interests or benefits for the Company.
9. Not to undertake any actions that may result in a reduction of the achievable maximum benefits for the Company; or not to act in any way that would favor and afford benefits for other persons/Parties or legal entities.
10. Be committed to protect and prevent as well as stamp out any possible fraudulent acts or corrupt practices; whereby such (anti-corruption) actions must be undertaken in a speedy and decisive manner so as to establish a positive corporate value for and image of the Company.

### **4. Business Ethics Towards Stakeholders**

#### **4.1 Policy on the Treatment of the Community, Society and the Environment**

The Company is part of the wider society; and as such, it has the obligation and responsibility to develop the local community and society as a whole. Therefore, the Company has a policy to give great importance to the overall quality, safety, vocational health and well-being, and also the overall environment of the community and the wider society, through being focused on achieving the development of the community and society,

fostering and promoting religious beliefs, and creating in a positive manner, as well as on preserving the natural resources together with supporting the education of the younger generation and promoting public activities that will benefit the community as a whole. This is in order to strengthen the local community for the greater good of society as a whole, and also to create a good and clean environment, in order to enable the Company to grow in a sustainable manner together with the overall development of the wider society.

- 1) The Company is committed to actively participating, on a continuing basis, in being responsible towards society in regards to the overall quality, safety, vocational health and well-being, and the environment, together with making effective use of the natural resources to achieve maximum benefits, through recognizing the importance of the environment and the safety of all involved Stakeholders; and in supporting all social activities aimed at both preserving the environment and developing the overall quality of life for the community, based on a the principles of sustainable development.
- 2) The Company continuously instills an ongoing awareness and mindfulness, on the part of its Staff at every level, in being responsible towards the wider society as well as the environment.
- 3) The Company wishes to play a part, on a regular basis, in developing society and the environment in a more creative and positive manner; where by such joint activities are appropriate and will genuinely benefit the community, society as a whole, and also the environment. In choosing to make any charitable donations, relevant information must be assessed regarding the intended recipient, in order to ensure that such donations will be used in an effective and productive manner as well as will achieve real and concrete benefits.

#### **Undertaking activities relating to Corporate Social Responsibility**

The Company is well aware that 'society' as a whole is an important component in facilitating as well as promoting the ongoing and further stable growth of Company's businesses, whereby this starts with a small internal social circle within the Company – namely its Staff, which forms an important core community - supporting the achievement of its potential capacity and ongoing capability to being able to effectively compete at the local community level and then also eventually at the a national level, through undertaking various targeted activities as follows:

##### **4.1.1 At the organization level**

- Developing the overall skills of its Staff at all levels, and creating an internal knowledge-based organization within the Company through effective management of their capabilities;
- Promoting and supporting its Staff to actively participate in expressing their ideas relating to the Company;
- Promoting and supporting its Staff to actively participate in the ongoing development of the community.

##### **4.1.2 At the community level**



- Preserve and protect natural resources and the environment;
- Promote and develop the overall quality of life;
- Promote education as well as learning and development of the younger generation within the community;
- Promote both learning about and giving attention to local culture, good moral principles and dharma, so that these principles will become the core foundations for the ongoing development of a better quality of life for the younger generation.

#### **4.1.3 At the national level**

- Support various activities aimed at preserving and protecting the environment;
- Support the development of knowledge and learning, together with the establishment of an awareness or mindfulness in being responsible for the younger generation's social circle.

## **4.2 Policy on the Treatment of Shareholders**

The Company realizes that its Shareholders are the true owners of the Company's businesses, and that, in the long term, its duty is to create added-value for the Shareholders. As such, the Company requires that all Board Directors, Management Group members and Company Staff act in the following manner:

- 1) Discharge their respective duties responsibly with all due care, honesty and integrity, through making all decisions in an appropriate and reasonable manner based on the available information, that they believe to be adequate, and without any personal vested interests- whether directly or indirectly, for the maximum benefit of the Company with all good and appropriate intentions and without any personal conflicts of interests with the Company.
- 2) Act in full accordance with all applicable laws and stated objectives, as specified in the Company's regulations and resolutions of the Shareholders Meetings; and undertake all activities in full compliance with the established operating guidelines as specified by the principles and practices of good corporate governance and code of business ethics, for the overall maximum benefit of the Company's Shareholders.
- 3) Oversee and ensure that the value of the Company's assets do not deteriorate or are lost in an improper manner; and establish both an internal controls system and risk management procedures that are appropriately effective and efficient.
- 4) Create the opportunity for Shareholders to be able to actively participate in as well as to contribute their ideas to the overall governance and conduct of the Company's business operations.
- 5) Report on the current status and situation of the Company on a regular basis, as well as in a truthful, comprehensive and timely manner.
- 6) Disseminate news and communicate Company-related information, that are accurate in accordance with the actual facts, in an adequate manner to all

Shareholders on an equal basis and at appropriate times, in order to facilitate them to make their decisions accordingly.

- 7) Oversee and ensure that Executive Directors and Company Staff do not seek any personal benefits and gains for themselves or for any other involved Parties, through giving to others any confidential and internal Company-related information that has not yet been disclosed to the general public, and/or that they do not undertake any actions that will create any personal conflict of interests situations with the Company.
- 8) Establish effective channels of communications – including websites, mail, or telephone calls - that will allow whistle-blowers/informants to submit various complaints or information on any alleged acts of corruption, together with the associated procedures to respond to and protect the safety of any informants/complainants and including a process to provide eventual feedback, in a systematic and equitable manner.

#### **4.3 Policy on the Treatment of Company Staff**

Each and every Company Staff member is the most important component of the Company's business operations. As such, great importance is given to all Staff members, without any prejudice, bias, favoritism or preferential treatment whatsoever; whereby the Company promotes achieving unity among all Company's Staff members, as well as giving mutual polite treatment and mutual respect for each other's dignity as fellow human beings. The Company has also established a positive, safe and secure working environment; and offers Staff compensation that are appropriate together with other Staff welfare benefits; as well as makes available the appropriate supporting technology and work tools, so that the Staff can perform their tasks for the maximum benefit of the Company.

- 1) The Company treats all of its Staff members in the same and equal manner, without any prejudice, bias, favoritism or preferential treatment based on place of birth, nationality, gender, age, race or skin color, religious beliefs, physical disability, social status, family name, type or place of education, and any other personal traits or status that are not directly related to the undertaking the assigned work.
- 2) The Company gives equal opportunity for its Staff members to fully demonstrate their respective capabilities, through offering appropriate remuneration accordingly to create the required motivation for achieving their best performances in the form of monthly compensation/salary, bonus and any appropriate work-related expenses in accordance with established Company regulations, together with both immediate and long term training courses.
- 3) Company Staff members are required to discharge their duties and responsibilities to the best of their abilities, together with positive mindfulness, honesty, integrity and fairness; as well as to be fully committed to possessing good moral principles and ethical behaviors and to always act in a responsible manner.

- 4) Company Staff members are required to undertake their work in accordance with the established lines of reporting, receiving orders from and reporting to their respective direct Superior/Supervisor, without overstepping any established lines of reporting. All Staff members can make full use of the available physical resources, labor resources together with work facilities, tools and other amenities provided by the Company for their assigned work activities. However, they are not allowed to make use of such resources and facilities or amenities for any purposes other than in discharging their assigned duties and responsibilities or in making use and exercising their rightfully entitled welfare benefits.
- 5) Company Staff members are required to behave in a polite manner, to dress properly as appropriate to the occasion, and to act with the appropriate responsibility towards their assigned duties and work responsibilities; as well as not to act in any way that will have a negative impact on the overall image of the Company.
- 6) Company Staff members should fully cooperate and participate in all Company activities aimed at creating overall positive unity within the organization, and including any other activities undertaken by the Company for wider social benefits.
- 7) The Company promotes and supports the use or display of any entitled employee rights that are in accordance with established labor laws and regulations – with the exception of those activities considered as being illegal.

#### **4.4 Policy on the Treatment of Customers/Clients**

The Company has the highest standards for its products, as well as for the safety and quality and the integrity of its operations, in order to achieve maximum customer satisfaction. The Company also conducts its business with good moral ethics, together with providing easy and convenient access to its services; as well as respects the dignity and individuality of each and every customer/client. As such the Company will:

- 1) Treat every client on an equal basis and in a uniform manner, based on achieving mutually equitable benefits for both sides.
- 2) Disseminate news and disclose relevant information relating to its services and products, together with correct recommendations, to all customers/clients in an adequate and timely manner.
- 3) Strictly adhere to and act in full accordance with all the terms and conditions as agreed with its customers/clients. In the event that it is not able to do act in accordance with any terms and conditions, the Company will then inform the customer/client immediately in order to mutually discuss and agree on any required actions to resolve the issue(s).
- 4) Treat all customers/clients in a polite manner, as well as create full confidence and trust on the part of its customers/clients.

- 5) Respect the respective individual rights of all customers/clients, as well as treat all customer-related information with strict confidentiality and will not disclose any such information to other external Parties.
- 6) Establish procedures and processes to enable customers/clients to submit any complaints relating to the quality of its products and services, to respond to their needs and to operate its businesses to the best of its ability. This is to enable its customers/clients to receive quick and speedy response to their requirements/needs.
- 7) Support all activities aimed at both promoting and maintaining continued good business relationships between the customers/clients and the Company.

#### **4.5 Policy on the Treatment of the Process in Sourcing of Goods and Materials and on the Treatment of Business Partners/Operators**

The Company places great importance on the sourcing and purchasing processes for its goods and materials, which are essential in supporting the Company's business operations; whereby these processes are undertaken within the framework of good corporate governance policies and practices, as well as are subject to strict oversight and monitoring.

The Company also places great importance to other business operators/business partners, through treating all of them in an equal manner, based on equitable and transparent principles of fair competition for the sake of establishing mutually positive business relationships for the longer term. As such, the Company has established associated operating guidelines in regards to treating other business operators on a sustainable basis and also to the management of its supply chain, in order to enable these other business operators/business partners of the Company to operate their business in an ethical and equitable manner with mutual respect of each others' human rights; as well as to overseeing the vocational health and well-being of the employees, together with giving importance to effectively managing the various involved environmental issues on a sustainable basis; namely:

- 1) Source goods and materials that have the best results/benefits for the Company, through requiring that all goods and materials delivered to the Company should be in strict accordance with the specified quality, price and quantity standards together with a required speedy delivery timeline, and should also take full consideration of the Company's established policies regarding quality, safety, vocational health and well-being, and the environment.
- 2) Those Staff members undertaking sourcing activities are required to have in place effective advance planning for sourcing goods and materials, in order to avoid any need to source such items on an urgent basis without any appropriate associated reasons to do so.
- 3) The Company will not take advantage of any business operator, through taking into consideration of the potential associated benefits and negative damages in

regards to its overall reputation and corporate image in the eyes of outside Parties.

- 4) The involved Staff must give clearly specified, comprehensive and accurate information to the involved business operators in a transparent manner, and also give equal opportunities to all business operators.
- 5) The involved Staff should listen to any comments, complaints and suggestions made by and received from business operators/business partners, in order to make improvements and resolve any issues in the associated sourcing activities.
- 6) The involved Staff must maintain the confidentiality of any information relating to bids and proposals received from each of the business operators/business partners, and must not disclose any such information to other Parties.
- 7) All invitations given to business operators/business partners to submit their respective proposals/bids must be done in a manner that achieves genuine and fair competition on an equal and equitable basis for all business operators/business partners.
- 8) All price negotiations must be based on a good business relationships, and be mutually equitable for both sides; as well as must be transparent and fully documented.
- 9) Good business relations must be maintained with all business operators/business partners on a uniform and equal basis, as well as without making any demands for or accepting any items/assets or other benefits – either directly or indirectly – from the business operators/business partners.
- 10) The Management member, with responsibility for and authority to undertake sourcing activities, must use his/her good judgment in offering any suggestions or recommendations; as well as must listen to the opinions of those involved persons working at the operating level.
- 11) The Management member, with the responsibility for and authority to undertake sourcing activities, must oversee, review, and ensure that all associated activities at the operating level are undertaken in strict accordance with the established business ethics. Furthermore, should there be any acts of non-compliance, an immediate investigation must be made together with any appropriate disciplinary punishment accordingly.
- 12) If possible, support should be given to sourcing any goods and materials and services from a Thai business operator/business partner.
- 13) Sourcing of goods and materials should be undertaken in a systematic manner and with established procedures that are correct according to the associated technical process; whereby there are established oversight and stringent controls in place together with built-in flexibility to enable ongoing adaption to the ever-changing business and trading environment.

#### **4.6 Policy on the Treatment of Trade Competitors**

The Company treats all trade competitors in accordance with the Trade Competition Act BE 2542 (1999), the legal framework for fair trade competition as well as improper or fraudulent violation or infringement of trade secrets of any trade competitors; namely:

- 1) Acting or good behavior in a manner that conforms within the legal framework for fair trade competition, promoting free trade and competition, and non-dominance (or a monopoly) of the market.
- 2) Not seeking out any trade secrets of competitors in an improper, illegal or fraudulent, and inappropriate manner – such as, through bribing or using a competitor's Staff to obtain confidential information of competitor companies.
- 3) Not destroying the reputation of trade competitors through use of negative disinformation or false information.
- 4) Not supporting any joint actions or collusion in regards to any pricing offers in an inequitable manner for customers.
- 5) Not violating any laws or requirements relating to intellectual property rights.

#### **4.7 Policy on Workplace Safety and Hygiene**

The Company operates its businesses through taking into consideration the importance of safety and hygiene of its Staff and employees, since its Staff is the most importance asset and a key component for the Company's ability to both grow and effectively compete on a sustainable basis.

##### **Operating guidelines**

In operating its businesses, the Company has defined the following policies relating to the workplace safety and hygiene for its Staff

- 1) Management group members and all Company Staff must conduct business operations that incorporate, as a key component, a system to manage the quality, safety, and hygiene relating to the workplace and the work environment, which will facilitate and promote the effectiveness and efficiency of together with the achievement of maximum value-added from the work activities undertaken.
- 2) The Company undertakes all possible actions in order to control and prevent any possible form of losses resulting from accidents, fire-related hazards and work-related injury or sickness together with any damages to or loss of assets, violation of any established safety rules or regulations, and improper work procedures or any work-related errors. These actions are also to maintain the work environment relating to the safety of its Staff or the employees of its sub-contractors. As such, it is considered to be a key responsibility of both the Management group and Staff members to report any accidents or similar work-related incidents through observing these established procedures.
- 3) The Company has established plans and procedures to control and protect against any emergency situations in every area of its workplace and facilities,

together with plans and procedures to effectively manage any emergency or crisis situations within the organization. This is in order to be well-prepared once or if such situations have occurred – such as: fires; oil spills and overflow; spills and leakage of any gas, chemicals or waste materials - and any other similar incidents of a critical nature, that will interrupt ongoing normal business operations as well as will have a negative impact on the overall reputation and image of the Company.

- 4) The Company undertakes regular public relations and corporate communications activities, in order to educate and disseminate all relevant information and to create a better awareness and understanding, on the part of its Staff, its sub-contractors' staff and all involved Stakeholders, of the Company's relevant policies, rules and regulations, together with the established procedures and key issues regarding the quality, safety, and hygiene of the Company's workplace facilities and environment. This is so that they can all observe these required regulations and procedures, and avoid creating any dangers to their health and well-being as well as to the workplace facilities, assets and environment.
- 5) The Company promotes as well as instills an awareness, on the part of its Staff, regarding workplace quality, safety, health and hygiene, and environment so that it becomes an integral part of their daily work routine.
- 6) The Company participates in carrying out its social responsibilities with regard to the workplace quality, safety, health and hygiene, and environment in a genuine manner as well as on a continuing basis. It also supports effective use of natural resources to achieve maximum benefits, through recognizing the importance of the environment and the safety of all involved Stakeholders; as well as promotes any social activities aimed at preserving or protecting the environment and further improving people's quality of life within the community in accordance with to the principles of sustainable development.

#### **Report of Progress and Current Status**

Achieved results from all activities relating to workplace safety and health and hygiene are disclosed, through recording various statistical data on accidents or incidents of injury, and absence from work due to injury and sickness; whereby such information and statistics are reported in the Annual Report.

#### **Policy Reviews**

The Company's policy on workplace safety and health and hygiene are reviewed annually by the Board of Directors, so as to enable the policy to be always timely and to reflect the current situation.

#### **4.8 Policy on Staff Compensation and Welfare Benefits**

Quality Staff is considered to be a key factor in supporting the successful achievement of the Company's strategies. As such, recruiting, retaining and motivating such Staff are considered to be long term and valued investment, that will result in the organization achieving success in the longer term.

Amata VN PCL recognizes the vital importance of effective management of its Staff compensation scheme in a fair and equitable manner, which eventually will create a competitive business advantage for the Company.

### **Compensation**

1. Assess and determine the relevant job-value in a systematic manner, in order to define work group and associate positions/rankings based on the scope of duties and responsibilities as well as value or degree of importance for the organization. This is to then enable the determination of the applicable associated compensation, in order to be competitive within the external labor market while also effectively motivating the Staff internally.
2. Undertake Staff job performance evaluation 2 times per year.
3. Review short term compensation to be given, based on actual achieved job performance outputs, through using key performance indicators (KPIs) relating to:
  - Targeted performance objectives and goals together with agreed annual KPIs', degree of success or actual achieved performance results – on an organization-wide basis as well as for the work team and individual team members.
  - Special capabilities or individual expertise
  - Leadership skills
4. Review long term compensation to be given, based on actual achieved job performance outputs, through using key performance indicators (KPIs) relating to:
  - Upward promotions in the job position/rank, together with an increase in the percentage contribution to the provident fund by the Company based on the total number of years of employment in the Company, and/or giving Staff Welfare Benefits in the form of cash payments and additional amount of paid health and hospital related expenses. This is in order to motivate Staff members to continue ongoing development of their skills set.
  - Assessment of the degree of successful achievements in the job performance on a long term basis, through relating such achievements to the overall success of the organization's strategies based on the corporate 'Balance Score Card' program,

### **Staff Welfare Benefits**

Employee Provident Fund

### **Report and Disclosures of Information**

Disclosure of information on the associated operating activities are made, together with relevant statistics being recorded, are reported in both the Annual Report and the Sustainability Report.



#### 4.9 Policy on Human Resources Development

Amata VN PCL regards its Staff as a key factor and of great value in contributing towards the overall success and ongoing growth of the Company on a sustainable basis, through carefully selecting good individuals, creating very capable people who work in a professional manner; as well as through effective strategic planning and management of its human resources, that are fully aligned with the overall corporate strategies, in order to achieve the overall core corporate objective of being a 'High Performance Organization'.

Further, in order to establish the required corporate infrastructure for a company that is growing both at the national and regional levels, the Company regularly reviews its corporate structure together with making ongoing improvements to its management operations, its corporate cultures foundation; as well as continuously instills its core corporate values into its Staff throughout the organization. As such, the following associated operating guidelines have been established:

- 1) The Company's overall management of its Human Resources Management system and procedures must be aligned with and fully supportive of overall corporate strategies, business objectives and goals.
- 2) Define the Company's Human Resources Management system and procedures to be like those of a leading business company; whereby they should be in clearly defined, concise, transparent, and equitable as well as all moving towards the same uniform direction throughout the organization.
- 3) The Company will recruit, select as well as create good and very capable individuals, who work in a professional manner.
- 4) Every Superior/Supervisor has the duty and responsibility for managing and developing the human resources within their respective business units, in accordance with the Company's established human resources management system, procedures and operating guidelines.
- 5) Each and every Staff member has the duty to perform their work to the best of his/her ability and in a responsible manner; as well as to be fully committed in devoting their efforts to achieving the best performance outputs and adhere to the established principles of good business ethics in accordance with the overall corporate culture of the organization.
- 6) Development of human resources is the responsibility of the whole organization, the Superiors/Supervisors and every individual Staff member. The Company will develop, on a continuing basis, its employees by providing them with effective knowledge, know-how and abilities that are relevant to their assigned job responsibilities. The respective Superior/Supervisor is responsible for planning, monitoring progress, evaluating actual performance outputs, and providing feedback to their subordinates. While the subordinates are required to always seek out more knowledge and to learn more, through being committed to furthering their self-development.

- 7) Career advancement, together with the associated compensation and various motivation schemes offered are based on the quality of the (individual's) performance outputs, mindset, and the overall potential of the Staff member.
- 8) The Company will manage the Staff compensation/remuneration scheme, so that it is comparable with other leading companies in the same or nearest industry/business sector.
- 9) In achieving success in their job positions, the Staff member must possess relevant knowledge or know-how and skills in various aspects of the assigned work, together with other knowledge about the Company's business and also especially 'people skills'. During each year the Company offers, through informing the Superiors/Supervisory levels, various training courses; whereby after making their assessments, they will then consider the appropriateness of enrolling their subordinate Staff, who, during each year, should receive at least a total of 20 hours /per year of training and development activities.

### **Report and Disclosure of Information**

The Human Resources Division/Department is responsible for recording and maintaining relevant statistics in regards to the ongoing people development activities – namely: type of training and development courses offered, number of Staff attending each course and associated number of hours of training during the year; all of which information are reported and disclosed in both the Annual Report and the Sustainability Report.

#### **4.10 Policy on Non-Violation of Human Rights**

Amata VN PCL believes in the international 'Declaration on Human Rights' that all Staff members are valued as a human beings, regardless of their job or position; and all possess human dignity in an equal manner, with each person having an individual respective part to play in the overall duty to develop the organization so that it can grow together with them.

Thus, Amata VN PCL. respects the individual's human rights in a strict manner; whereby:

- 1) All Staff members have the freedom and equality in having the opportunity to display their respective potential capability and to work on an equal basis, without any prejudice or bias in regards to nationality, race, gender, religious beliefs, race and physical disability.
- 2) All Staff members are equal, and have the same protective rights under the law on an equal basis without any prejudice, bias or favoritism.
- 3) All Staff members have rights in their work, freedom of choice in regards to the applicable terms and conditions, that are both equitable and beneficial to the assigned work.
- 4) All Staff members have the right to be compensated equally for the same type of assigned work/job without any prejudice, bias or favoritism.

- 5) All Staff members have the right to receive a fair rate of compensation that is of benefit for the security of their livelihood, of the individual and of the immediate family that is suitable for their human dignity. And, if necessary, additional required social protection and benefits must also be received.
- 6) All Staff members have the right to rest and recreation time, including arranged working hours/time as appropriate and occasional paid holidays from work.
- 7) All Staff members have the right to enjoying adequate living standards that is sufficient for their own health and well-being as well as for their family, including food, clothing, living facilities and medical attention together with any necessary social services.
- 8) Staff members have the right to security of livelihood during periods of not working, sickness, or when in a state of widowhood, as well as in old age or when lacking any employment that are all beyond their personal control.
- 9) The Company will not tolerate any incidents of sexual-abuse or sexual harassment of any Staff members, regardless of any reason whatsoever.

#### **Report and Disclosure of information**

A report of the associated and relevant information is disclosed in the Annual Report.

#### **4.11 Policy on and Operating Guidelines for the of the Treatment of Creditors**

Amata VN PCL has a policy on treating its creditors in an equitable manner, through establishing the following associated operating guidelines and procedures:

- 1) The Company ensures that it will repay, in full and on time as required, all types of loans and borrowings, together with associated interest payments, as well as will comply to all agreed terms and conditions.
- 2) The Company will not use any funds borrowed in any way other than as intended and that contravenes the stated purpose of the loan when seeking funds from the creditor. As such, the Company will consider, as best as it can, the real necessity for borrowing funds before actually deciding to borrow or guarantee loans from its creditors.
- 3) The Company will not hide any relevant information or true facts that may result in damages or loss to its creditors; but will disclose, in a complete and comprehensive manner, all relevant information to its creditors as necessary and required.
- 4) The Company is committed to conducting and managing its businesses in an effective manner, so as not to allow any required loan repayments to be missed; and will maintain, at its best, the ability to service debts.
- 5) The Company is committed to strictly adhering to and acting in accordance with all terms and conditions as agreed with its creditors. However, in the event that there is a need to amend any agreed terms or conditions, the Company will then immediately meet and discuss the issue together with its creditor(s), as follows:
  - The Company is committed to acting in strict accordance with the terms and conditions of the loan or guarantee agreement with its creditor(s); whereby

in the contract negotiations consideration will be made to the appropriateness, necessity, and overall benefits for the Company.

- The Company undertakes to execute all loans and guarantee contractual agreements with all due care, and always in written form.
  - In the event that it is necessary to amend any previously agreed terms and conditions of loans or guarantee agreements, the Company will then immediately discuss the issue with the creditor in question; whereby any amendments will take into consideration the appropriateness, necessity and overall benefits for the Company.
- 6) The Company is committed to maintaining good business relationships with its creditors, and to creating mutual trust and confidence.

### **Report and Disclosure**

Disclosures of associated information and activities are reported in the Annual Report.

#### **4.12 Policy on and Operating Guidelines for Non-Infringement of Intellectual Property (IP) Rights**

Amata VN PCL has a policy to have all Staff members to have the duty and responsibility for making the fullest and best use of the Company's assets, as well as to ensure that the assets do not deteriorate or are lost, or not to make use of these assets for their own personal benefit or the benefit of other Parties. Additionally, Staff members are responsible for protecting against and also for overseeing that any allegations of infringement of Intellectual Property Rights from occurring. They are also responsible for ensuring that there is no disclosures/distribution of any associated Intellectual Property Rights materials without prior approval is obtained, and for not, themselves, infringing any Intellectual Property Rights of other Parties.

#### **Operating Guidelines**

- 1) It is prohibited for any Staff members to use/make use of any information or data, documentation or materials, computer software programs, books or written articles, together with any VDO and audio tapes that belong to other Parties, in manner that would result in an infringement of the Intellectual Property Rights of others, regardless of whether or not the legal and rightful owners of such Intellectual Property contents have declared or asserted, in writing, their 'copyright' or rights of ownership.
- 2) All Staff members have the duty and responsibility in jointly help in overseeing and protecting any work outputs of the Company that are the Intellectual Property of the Company. They are also not permitted to make use of such Company Intellectual Property for personal benefits or allow other Parties to make use of such Company Intellectual Property without prior approval and agreement.
- 3) While working as a Staff member of the Company, any achieved outputs of their Research & Development activities in making any improvements or enhancements

that are connected and involved with the business operations of the Company, in any way, are all considered as the Intellectual Property of the Company.

- 4) Staff members of the Company have the duty and responsibility to report to their Superiors/Supervisor, in the event that they should come across any actions or activities that appear to infringe any Intellectual Property Rights of the Company or that may lead to a legal dispute relating to any Intellectual Property Rights of the Company.
- 5) Upon ceasing to be an employee of the Company, all Staff members are required to hand back to the Company all Intellectual Property related materials and assets - including any actual work outputs, created products/items, information and data, formulas, reports and statistics, computer programs, and working procedures.

### **Report and Disclosure**

Disclosures of associated information on any infringement of any Intellectual Property Rights, through recording statistics of any such incidents for eventual disclosure, are to be made in both the Annual Report and the Sustainability Report.

### **4.13 Policy Corporate Social Responsibility**

Amata VN PCL has a policy to develop the wider society, in which the Company operates its businesses, to be more developed and to grow together with the Company's development and growth. The Company's Board of Directors have the intent to participate with its Stakeholders through being committed to build a well-accepted positive relationship of mutual trust, together with creating a better overall quality of life for the Company's Staff and their family as well as the immediate local community in which our business operations is located. The Company's Board of Directors also fully recognizes the importance that the ongoing growth of the organization must move in the same direction as the overall development of the wider society.

The Company is committed to conducting its business with integrity and in an equitable and transparent manner, through taking into consideration the overall benefits of and possible impacts for all Stakeholders as a result of the organization's business operations and activities; as well as to helping to develop the potential of people within the wider society by focusing on building people's knowledge, thinking, good ethics and moral principles. The Company undertakes various activities and events aimed at improving overall social standards, so that it is a good society comprising of good and capable people, who are mindful of their social responsibilities, which will then enable the wider society to coexist with the Company in a positive manner as well as on a sustainable basis.

### **Report and Disclosures**

Associated information on the various CSR activities undertaken annually and/or during the year are disclosed in the Annual Report.

#### 4.14 Policy on Operating the Business within Environmental Standards

Amata VN PCL operates a property development business for quality industrial businesses as well as for public utilities businesses and its associated services, targeting local and foreign investors. At the same time, it recognizes the importance of making use of available natural resources together with the associated potential impact on the environment and the genuine need to protect and preserve the overall environment of the local community; whereby the Amata Group of Companies is intent on operating its businesses with the following commitments:

- 1) The environment: The Amata Group of Companies operates a property development business for industrial businesses as well as for public utilities businesses and its associated services, targeting local and foreign investors to invest in quality industrial activities. At the same time, the Company recognizes the importance of making use of available natural resources together with the associated potential impact on the environment and the genuine need to protect and preserve the overall environment of the local community.
- 2) The Amata Group of Companies will act in full accordance with all applicable laws and regulations relating to the environment.
- 3) The Amata Group of Companies is focused on preempting and preventing the occurrence of any problems that will impact the status of environment before they arise, as well as at the immediate locations involved.
- 4) To reduce as much as possible the amount of waste, and to make the fullest possible use of waste water that has already been treated and cleaned.
- 5) The Amata Group of Companies is focused on using and conserving any energy and associated resources used in its production process in an effective and efficient manner.
- 6) The Amata Group of Companies will continually develop and improve its wastewater treatment process, its clean water production process, its waste materials and general garbage treatment process, together with its system and process of reusing water.
- 7) To instill an awareness, on the part of all its Staff, for the need to help preserve and protect the environment - through using the slogan of "Save Earth, Safe Us".
- 8) To advertise and promote its 'environment-friendly' policy to all its Staff or other Parties undertaking any work activities, as well as to the general public.

#### Report and Disclosures

Associated information on the various associated activities are disclosed in the Sustainability Report.

#### **4.15 Policy on Promoting Effective and Efficient Use of Resources**

1. The Amata Group of Companies will act in full accordance with all applicable laws and regulations relating to the environment.
2. The Amata Group of Companies is focused on preempting and preventing the occurrence of any problems, that will impact the status of environment, before they arise as well as at the immediate locations involved.
3. To reduce as much as possible the amount of waste, as well as to make the fullest possible use of wastewater that has already been treated and cleaned.
4. The Amata Group of Companies is focused on using and conserving any energy and associated resources used in its production process in an effective and efficient manner.
5. The Amata Group of Companies will continually develop and improve its wastewater treatment process, its clean water production process, its waste materials and general garbage treatment process, together with its system and process of reusing water.
6. To instill the awareness, on the part of all its Staff, for the need to help preserve and protect the environment through using the slogan of "Save Earth, Safe Us".
7. To advertise and promote its 'environment-friendly' policy to all its Staff or other Parties, who undertake work for the Amata Group of Companies, as well as to the general public.
8. The Company has published its "Code of Business Ethics Handbook/Manual" and has announced the Handbook for acknowledgement, use and strict adherence by all Board Directors, Executives and Management Group members and Company Staff. The Company has also defined, in the abovementioned Company's "Code of Business Ethics Manual/Handbook", the appropriate punishment and penalty for any acts of non-compliance with these established business ethics, together with the associated compensation measures in the event that any Stakeholder suffers damages as a result of the Company violating or infringing any rights as entitled by the applicable Stakeholders laws.
9. The Company has overseen and protected the environment in a positive and effective manner.

#### **Report and Disclosures**

Recorded relevant information on associated activities undertaken are disclosed in the Annual Report.

#### **5. Code of Conduct for Company's Staff**

The Company operates a business relating to industrial estates for the benefit of its Shareholders and the country's economy; and as such, it is necessary to maintain its professionalism, flexibility and independence. Therefore, in order to achieve the abovementioned corporate characteristics in a stable and ongoing manner, various 'best practices' have been

established for the Management and Staff members, which are considered as operational business ethics, as follows:

### **5.1 Self-Treatment**

- 1) Discharge the assigned duties in a responsible manner with honesty, integrity and full commitment and devotion to their work. Act in full compliance with all applicable rules, regulations and policies of the Company as with the established corporate culture and values through place importance on the overall benefits of the Company.
- 2) Respect and act in strict accordance with all applicable laws and regulations of the Company.
- 3) Operate and undertake their assigned work with due care and honesty; and not to make use of their position/rank to gain any benefits in an improper or illegal manner.
- 4) Be fully committed to be a good and capable person, through constant self-development in a positive manner, in order to benefit themselves and the Company as a whole.
- 5) Study and acquire new knowledge and experiences, in order to improve their work-related capabilities and abilities.

### **5.2 Treatment of customers/clients, other involved Parties and the wider Society**

- 1) Maintain strict confidentiality of the information of customers/clients and business partners as well as that of the Company, through ensuring and taking care that no Company-related confidential documents and news are leaked to or falls into the hands of those who are not directly involved.
- 2) Act in full compliance with all safety regulations, as well as oversee and ensure the safety of the operating environment.
- 3) Achieve and deliver quality work outputs in a timely manner as required by customers/clients.
- 4) Make use of the channels of communications for listening to and obtaining any comments, opinions or suggestions from the customers/clients, in order to benefit from implementing any improvements in the Company's operating procedures.
- 5) Avoid giving or receiving any gifts/items, acts of hospitality (entertaining) or any other benefits to/from involved business partners or any Stakeholders of the Company's businesses, except for the specific purpose of normal good business conducts or for normal customary special festive occasions or events; whereby such gifts and entertainment should be of appropriate and reasonable value. If the gift item received is in the form of cash or of a very high value, the item should be immediately reported to the direct Superior/Supervisor or chain of command as well as be returned.

### **5.3 Treatment and Actions among Fellow Staff Members**

- 1) Respect the individual personal rights of all fellow Staff members; avoid disclosing any information about any fellow Staff members – including work-related as well as personal information; and avoid criticizing fellow Staff members in a way that will have



a negative or damaging effect on the person in question and/or the overall image of the Company in general.

- 2) Do not make accusations against or disclose any disinformation about other fellow Staff members, that may result in spreading disunity and discord and cause internal damages within the organization or in causing damages to any other persons involved with the Company.
- 3) Maintain and jointly create an atmosphere of oneness, unity and close collaboration amongst all the Company's Staff members; as well as mutually support and help fellow workers in a positive manner for the overall benefit of the Company.
- 4) Behave towards fellow workers in polite manner with generosity and good human relations; as well as not hide from or fail to disclose any work-related information to fellow workers. Constantly adapt yourself to be able to work with others as a team; and show respect for fellow workers in not claiming any achieved work outputs of others as being your own.
- 5) Be committed to having good moral principles and ethical behavior; and avoid all immoral or sinful acts together with always avoid behaving in a manner that will have a negative effect on yourself and the Company as a whole.
- 6) Report to the direct Superior/Supervisor or the chain of command or to the Audit Committee, in the event of being aware of any suspicious incidents of corruption or wrongful actions within the Company.
- 7) Help undertake any activities aimed at protecting and preserving a positive working environment and ambiance, as well as at driving the organization towards the achievement of excellence.

#### **5.4 Treatment of the Organization**

##### **5.4.1 Operating guidelines relating to accounting and financial transactions**

###### 1. Correct recording

- Correct recording all business transactions of the Company must be fully accurate, and complete as well as can be audited without any form restrictions or exceptions.
- Recording all accounting and business transactions of the Company must be accurate and true to the actual facts, without any distortion or documenting any false information for any reason whatsoever.
- Company Staff, at all levels, must undertake all business transactions in accordance with the established regulations and requirements of the Company. This also includes any business-related documentations that must be complete and consist of the actual facts, in order to effectively disclose all relevant information in a beneficial and timely manner; whereby any involved Parties responsible for recording details of such accounting and financial transactions of the Company can do so accurately and completely in the established accounting system of the Company.

###### 1. Accounting and Financial Reports

- Every Staff member must not distort or falsify any information – regardless of whether it is information relating to accounting and financial transactions or to any operating activities.
- Every Staff member must recognize that having accurate and completely correct accounting information is the joint responsibility of all Board Directors, involved and responsible Management group members and Company Staff members.
- Every Staff member is responsible for preparing and/or disclosing accurate information relating to all business activities undertaken
- Acting in accordance with the law
  - Every person, at all levels, within the organization must act in full accordance with all applicable laws and associated legal and regulatory requirements – either in Thailand or overseas, in order to enable fully accurate, complete and comprehensive accounting and financial details to be recorded and documented.
  - Every person, at all levels within the organization, must adhere to the principles of honesty and integrity; not have any prejudice or bias as well as have correct and straight forward behavior in keeping all detailed records; whereby such straight forward behavior includes not being involved in any illegal, improper or unethical activities.

#### **5.4.2 Operating guidelines relating to internal controls**

Having in place internal controls and internal audit procedures, that are effective, correct and creditable, is essential to create a positive image for the Company. The Company has defined policies on corporate governance practices relating to effective internal controls systems together with risk management procedures that are appropriate and adequate; as well as monitors and evaluates these activities on a regular basis. The Company is committed to having in place the most effective internal audit procedures as possible; whereby the Audit Committee is responsible for overseeing this activity together with a very capable Internal Audit Unit, as well as the Management group and all Company Staff give great importance to having in place such internal controls and internal audit procedures and activities.

- 1) The Board of Directors has established the corporate governance-related policy to have in place an adequate internal controls system together with appropriate level of risk management procedures as required to ensure the achievement of the stated corporate objectives and that these will not be adversely affected; whereby close monitoring and evaluation of the outputs of such activities are made on a regular basis.
- 2) The Audit Committee reviews the established internal control system and reports the evaluation results to both the Board of Directors and the Shareholders.

#### **There are 5 core components of the internal controls systems as follows:**

- Having in place a ‘Control Environment’, so that the Company Staff have a positive mindset towards the established internal controls.

- Having in place effective 'Risk Assessment' procedures to be able to adequately evaluate various risk factors relating to the business operations of the organization, that may have an adverse effect on the overall goals and success of the business activities.
  - Having in place effective 'Control Activities' in regards to all duties and responsibilities as well as for all Staff levels that are appropriate for the targeted acceptable levels of risks.
  - Having in place a good Information and Communications technology system that is adequate, creditable and timely in being able to effectively communicate, as appropriate, with both internal and external Parties of the organization.
- 3) Having in place effective 'Monitoring and Evaluation' procedures, in order to ensure that the established internal controls system is adequate as well as is being actually implemented; and also in order that any required improvements or enhancements are made in a timely manner, so as to be timely and be aligned with the ongoing changes in the overall current situation.
  - 4) Management group members implement the policies, as defined by the Company's Board of Directors, so that the overall business operations will achieve the targeted goals, through :
    - Senior Management establishes an effective internal controls system within the Company; and instills, on the part of the Company's Staff, the required disciplines and positive mindset in regards to internal control procedures.
    - Middle Management implements the established internal controls system and associated procures within their respective business departments for which they are responsible; as well as monitors, evaluates and makes ongoing improvements to the actual practices undertaken in order to ensure that they are fully in accordance with the established and intended procedures.
  - 5) Every Company Staff, at all levels, complies to the various established rules, regulations, procedures, orders and measures as well as internal controls systems and procedures.
  - 6) The Internal Audit Unit is directly responsible for monitoring and evaluating the results and outputs of the established internal controls system and procedures; as well as for overseeing and assessing full compliance is made by everyone. It will also make suggestions or recommendation to the various operating business units, as appropriate to the constantly changing current situation, business environment and perceived risks factors.

#### **5.4.3 Operating guidelines on the use of information and communications technology (ITC) system**

The Company supports the Company Staff to make use of the information and communications technology system, in order to create and enhance the understanding on the part of external Parties for the overall benefit of the Company;

whereby full care must be taken in undertaking their work, together with the Intellectual Property Rights of others must be fully respected and observed.

- 1) The Company has defined that the information and communications Technology system is a key component in supporting and enhancing both the effectiveness and efficiency of Company's business operations. As such, it is the responsibility of everyone in the organization to use the information and communications technology systems in accordance with all applicable laws together with the orders issued by the Company and within the established standards of the Company.
- 2) The Company has established cyber-safety and cyber-security procedures relating to the information and communication technology system – namely: the computers system, the information contained in these computers - in accordance with international standards.
- 3) Every Company Staff member has the duty to adhere to these established operating procedures:
  - Be responsible for protecting and ensuring that the Company's information and communication technology system assigned and being used by their business unit or themselves personally is not accessed, in an improper manner, by any unauthorized persons; as well as not to disclose any important business-related information to those not involved or authorized to know.
  - Have strict discipline in using the Company's information and communications technology system and any associated equipment, so that there will be no adverse impact on the Company's reputation and those of other Parties – such as: using the system to access information in an improper or illegal manner; causing damage to the reputation or assets; disturbing or disrupting the use of the Company's information and communications technology system by others; and illegally obtaining other people's password and any information; creating any false computer information or posting and disseminating inappropriate pictures, audio clips or information; making personal use of the system and not for the business purpose of the Company, together with any other associated illegal activities.
  - Not to infringe or violate any Intellectual Property Rights of others
  - Must use a special password when sending any important business-related information via the internet; and not to exchange any important business-related information through an unsecured website.
  - In the event that a Company Staff asks for approval for an associate worker or sub contractor staff to use the ITC system, the Company Staff in question must oversee and ensure that the associate worker or sub contractor staff as well as take responsibility for any resulting damages that may be caused for the Company.
- 4) The Company will search, access, monitor and evaluate any information relating to the use of the ITC system by a Company Staff, in the event that it suspects a Staff member of using the ITC system in an allegedly inappropriate and improper manner, or in order to protect the safety and ensure the overall security of the Company's ITC system.

- 5) In the event that the Company is made aware of or knows that any Staff member has violated or infringed any Intellectual Property Rights of others, and the result of the subsequent investigation, undertaken in an equitable manner, indicates that this is true; then the offender will be subject to disciplinary punishment and/or legal prosecution accordingly - as appropriate on a case by case basis.

#### **5.4.4 Operating guidelines on maintaining confidentiality**

With regards to any confidential information not disclosed for public use, including information about the types of customers/clients or information given to the Company by its customers/clients in trusting the Company, the Company will be responsible for maintaining the security and confidentiality of all such information. As such, only those people with a need to know will be given access to such information; and it is the duty of those officials, with the responsibility for keeping and safeguarding such confidential information, to strictly adhere to the following security procedures:

1. Maintaining the confidentiality of the Company's information
  - The Company's Board of Directors, Management Group members, Company Staff, employees and any sub contractors and their staff must maintain the confidentiality of all business-related information and documents and formulas, together with any results of R&D activities and developed items/processes that are considered to be the intellectual property or asset of the Company.
  - Those who are appointed as Company Board Directors Management Group members, Company Staff, or hired as employees and sub contractors and their staff must not disclose any business-related information and any associated documentations that are considered as being confidential.
  - Management members and Company Staff must be informed of all procedures relating to the security, safe-keeping and maintenance of the information confidentiality; as well as must act in full accordance with such procedures, in order to ensure that such confidential information is not unintentionally disclosed by mistake.
  
2. Establishing the security levels of information
  - Confidential trade and business information must be fully protected from being leaked or disclosed, based on the degree of importance of such information - namely: information that can be disclosed, information that cannot be disclosed, confidential or secret information, and very confidential and top secret information.
  - Joint use of internal company information/data must be only undertaken within the framework of the assigned duties and responsibilities

### 3. Disclosing information and news to external Parties

- The President/Managing Directors or those authorized/assigned by President/Managing Directors will decide and approve what information can be disclosed to the general public
- Disclosures of information about any Joint Venture Business Partners must be approved by the Joint Venture Partner in question.
- The authorized Business Unit/persons to approval and/or disclose any information to the general public are: Office of the President/Managing Directors, the Corporate Communications Department, and the Investor Relations Department; whereby the Business Units that owns the relevant information will be responsible for preparing the detailed information to be disclosed.

### 4. Expressing opinions to external Parties

- Disclosing or expressing any opinions to external Parties is not permitted.
- You should ask yourself first “whether or not you have the duty and responsibility to express any such opinions to any external Parties”; and if not, then you should decline to comment or express any opinions in a polite manner, and suggest that further contacts should be made directly with involved Company Official/Office as indicated above.

#### **5.4.5 Operating guidelines on receiving and giving gifts, items/goods or assets, or any other benefits**

Receiving or giving of any gifts or items upon traditional or customary occasions and done in accordance with good moral principles and business ethics is normal and accepted; whereby the Company’s Staff can undertake such actions in order to display loyalty and gratefulness or caring for others. However, the giving and receiving of gifts or other items and benefits that is inappropriate and improper may result in future uneasiness, as well as may affect any future work-related decisions together with an eventual loss of benefits for the Company as a whole. As such, the Company definitely does not support the giving of any bribes; whereby the giving or receiving of any gifts or other items should be done in accordance with the following principles and procedures:

1) Company Staff members can accept gifts or items or other benefits from any person in the following manner:

- Any items/goods or benefits that is appropriate and in accordance with the law or any specified regulations based on the applicable laws,
- Gifts or items/goods or other benefits that are given in an ethical manner, namely;

- receiving from relatives
- receiving such items as given to people in general

2) The Company had defined additional operating guidelines with regards to giving/receiving gifts and other items/goods or benefits as follows:

- All Company Staff, at every level, including their family members is forbidden to request or ask for any gifts and other items/goods, or benefits from the Company's contractors or sub-contractors, business partners, customers/clients, business operators/suppliers, joint investors, or any other Stakeholders involved with the businesses of the Company whatsoever; which may affect the Company in making future decisions, potential bias or uneasiness, or may even lead to a potential conflict of interests situation.
- The Company will use its discretion and good judgment in giving gifts or other items and benefits to others, that is not considered to be improper, inappropriate or extravagant, not in breach of any good custom or tradition and not against any applicable laws in Thailand or in an overseas market in which the Company has made an investment to operates its business.
- The Company will regularly remind those who are involved to disclose any such actions in regards to receiving or giving of any gifts and other items or benefits; as well as will always inform all its contractors, sub-contractors, business partners, customers/clients, business operators/suppliers and all those involved with the Company's businesses of this Company policy on giving/receiving gifts etc.

#### **5.4.6 Operating guidelines on vested interests and conflict of interests**

All Company Staff are required to undertake their work through keeping in mind that the overall interest or benefit of the Company is more important than their own personal benefit; and that they should not have any duplication or conflict of interests, as well as not have any intended personal gains and be free from any influence from their close relatives and friends.

As such, all Company Staff should act in strict accordance with the following measures aimed at preventing any potential vested interests, and should disclose any vested interests as specified by the Company:

- 1) Not be a shareholder/business partner/investor with a controlling power or a Management member in any company or business that is in direct competition with or of a similar nature as that of the Company.
- 2) In the event that a Company Staff becomes involved in a business or a situation that may have potential conflict of interests with the Company, then this fact must be immediately disclosed to the direct Superior/Supervisor.
- 3) Not to seek or obtain any benefits, by using any information or other items received due to the assigned job position.
- 4) Avoid becoming involved in any business or activities that may result in a conflict of interests situation with the Company, or that may create any form of

financial obligations with anyone involved or connected with the Company's businesses.

- 5) Avoid undertaking any additional work activities other than those assigned by and undertaken for the Company, which may have an impact on the assigned duties and responsibilities within the Company.
- 6) Support all social activities relating to preserving and protecting the environment as well as to improving the overall quality of life for those in the community, in accordance with the principles of sustainable development.
- 7) The Company continuously instills, on the part of its Staff at all levels, the awareness and mindfulness relating to corporate social responsibilities as well as to its responsibility towards the environment.
- 8) The Company wishes to actively participate, on a continuous basis, in creating and developing a better society and environment, through undertaking only those appropriate activities that are aimed at achieving genuine benefits for the community, the wider society and the environment. In the event of making any charitable donations, details will be reviewed and assessed, in order to be sure that the donations will be used in an effective and productive manner to achieve real social benefits as intended.

#### **6. Oversight in ensuring full compliance with and in regularly reviewing of this "Code of Conduct in conducting Business"**

The Company has defined and considers that it is the duty and responsibility of all Board Directors, Management group members and Company Staff to acknowledge and act in full compliance with the established policies and guidelines contained in this "Code of Conduct in Conducting Business" Handbook; whereby such compliance is not on a voluntary basis, and stating the fact of "not being fully aware of the established operating guidelines" cannot be used as an excuse for non-compliance. All Executives and Management group members, at every level within the organization, are required, as a top priority, to oversee and act to ensure that their respective subordinates fully acknowledge, understand and genuinely behave in strict compliance with this "Code of Conduct in Conducting Business" Handbook and its associated operating guidelines.

The Company also does not wish to have any actions that are against the law be in conflict with this established principles and code of good business ethics. In the event that any Board Directors, Management group members and Company Staff do not act in full compliance with the established good business ethics, they will be subject to disciplinary action; and if it is found that any such persons has broken any laws, or has not complied with any applicable public sector rules or regulations or those of the Company, then they will be handed over to the public authorities as applicable.

The Company's Corporate Governance Committee will regularly review these established code of business ethics and the associated operating guidelines every year, in order to ensure that they are current and timely to the latest situation and operating environment.



---

**Form for use in acknowledging and confirming agreement to act in full compliance with Amata VN PCL's "Code of Conduct in Conducting Business Handbook"**

**I have read and understand, as well as agree to fully comply with the Company's "Code of Conduct in Conducting Business" as the core operating principles.**

---

Signed: .....


( )


Division/Department.....

Date.....

---

*Note: Should you need any further clarification and explanation regarding the contents contained in this document :*

 For Board Directors and Management Group members:  
Please contact The Company Secretary  
Direct Telephone No. : (66) 0-2792-0004  
Telephone (66) 0-2792-0000 ext. 157  
Fax (66) 0-2318-1096

 For Staff members:  
Please contact The Human Resources Department  
Telephone : (66) 0-2318-0007  
Fax : (66) 0-2318-1096



[www.amatavn.com](http://www.amatavn.com)

**AMATA**  
VN

**AMATA VN PUBLIC COMPANY LIMITED**

2126 Kromadit Building, New Petchburi Road,  
Bangkapi, Huay Kwang, Bangkok, 10310, Thailand

Tel : + 66 2 792 0000