



Code of Conduct  
**2024**

AMATA VN PUBLIC COMPANY LIMITED

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## Definitions

|                         |   |
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| 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.  |

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|-------------------------|---|
| 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

25 February 2025

Mrs. Somhatai Panichewa  
Director and CEO

25 February 2025

## 2. Code of Conduct in Conducting Business

### 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.

*Please see Anti-Corruption Policy and Whistleblowing Policy in the Good Corporate Governance Policy Handbook.*

### **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**

*Please see related policies in the Good Corporate Governance Policy Handbook.*

### **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.
2. 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.

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***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.***

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Signed: .....

( )

Division/Department.....

Date.....

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*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*



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