



RPCG Public Company Limited

Code of Conduct and Business Ethics Manual

(Revision 2024)

Remark: The Manual was approved by the Board of Directors' Meeting No. 1/2024 and is effective on 23 February 2024.

Message of the Chairman

Dear Every Director, Executive, and Employee

With awareness of the Board of Directors of RPGC Public Company Limited (“Company”) on the importance of business operation under the Corporate Governance Code, therefore, it has considered updating and approving the Code of Conduct and Business Ethics Manual to encourage every director, executive, and employee to strictly operate and perform according to the Company’s regulations, rules, sets of regulations, and laws with integrity, honesty, correctness, transparency, openness, virtue, and social responsibility, as well as all parties of stakeholders to build trust for shareholders, investors, customers, trading partners and all sectors of stakeholders. In addition, the Board of Directors has determined the continuous review and monitoring of performance under the Code of Conduct and Business Ethics Manual.

However, every director, executive, and employee has been requested to study and apply this Code of Conduct and Business Ethics Manual as a guideline for practice and conduct to create values and carry the Company to achieve goals determined by the mission, as well as further upgrade and develop the organization for sustainable growth and progress.



(Mr. Satja Janetumnugul)

Chairman of the Board of Directors

RPGC Public Company Limited

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Definition

Code of Conduct means The principle of appropriate conduct showing virtue and ethics that should be performed in occupation mainly codified by the persons in each profession for use and adherence for practice focusing cultivation and empowerment of awareness arising in themselves about the proper way of conduct and expecting the adherence to maintain reputation and strengthen their and organizational honors.

Business Ethics means the Best practical guidelines for the Company's business operations in which the executives and employees shall carry the organization to ensure the Good Corporate Governance System.

Company means RPCG Public Company Limited and its affiliated companies.

Director means Directors and the Sub-Committees of the Company.

Executive means Directors, Managing Director, top four holders of management level position inferior from Managing Director and equivalent level.

Employee means The employees in command level/equivalent to an inferior level and the employment contract employees

Related Party means The persons or juristic persons who are the related parties according to the definition of the SEC and/or possess characteristics determined by the Capital Market Supervisory Board.

Stakeholder means The persons and/or juristic persons who are involved in business operations of the Company, including shareholders, directors, executives, and employees of the Company, customers, trading partners, creditors, trading competitors, communities, and society.

Disclosure means The disclosure of the details of the Company's business activity-related information under the Public Limited Companies Act B.E. 2535 (1992) / the Securities and Exchange Act B.E. 2551 (2008) /rules and regulations of the Stock Exchange of Thailand and the SEC.

Conflict of Interest means The Implementation of any activities that may have personal needs or needs of the related parties either by blood or by means, influence decision-making or may obstruct maximum interests.

Vision : We aim to be the Holding Company that creatively and sustainably diversifies investment in new various businesses under rapid changes.

Mission :

- To develop the business under RPCG's shareholding for competitiveness in each industry to bring about sustainable profit.
- To invest and operate the business emphasizing the competition that creates or substitutes the product needs in the existing market.
- The Company's strength is the working team. We will develop the personnel, give learning opportunities, and create a good working environment for the maximum potential of every employee.

Therefore, the Board of Directors has determined better practices under "**Code of Conduct and Business Ethics**" Manual aligned with the Important Corporate Governance Code, and also determined the review and monitoring of the performance under the Code of Conduct and Business Ethics Manual as the guidelines for the personnel of the Group of the Company, including the directors, executives, and employees of the Company and its subsidiaries to strictly adhere to and comply with as follows:

Part 1: Business Ethics

1. Engage the business with integrity and honesty in terms of law, and code of conduct, and operate the business with responsibility for persons, communities, society, and environment.
2. Fairly and straightforwardly treat customers, maintain a neutrality of use of operation discretion without discrimination. If the agreements or conditions cannot be complied with, the customers must be urgently informed to mutually find a solution.
3. Being independent of operation, providing comments and suggestions irrespective of personal and their companions' interests, not falling under the influence of any persons or groups of persons, and not having any situations that can enforce not to express opinions as it should be.
4. Engage the business by adhering to strict compliance with the relevant matters of law and requirements, having a standard operating system and good control using full knowledge and competency with diligence, adequate information, and referable evidence.
5. Not disclose the information without the authorization of the authorized person, unless in the case of legal disclosure of information, and prohibited from using confidential information acquired from duty performance for self-, companion, and relative's benefits.

6. Correctly and completely disclose the news of product and service information to the customers to enable them to complain about deficiency of products and services.
7. The Company conducts itself to politically neutralize whether the act prefers or supports any political party or whoever with political power. In addition, the Company also respects the liberty and rights for exercising political rights of the employees, such as voting for election or membership of political members.

Part 2 : Code of Conduct

1. Code of Conduct to the Stakeholders to whom Directors, Executives, and Employees have an accountable duty is as follows:

1.1 Code of Conduct on Responsibility for Shareholders

The Company shall operate the business with transparency, and fairly, efficiently, correctly, and reliably disclose the information, aiming for the creation of good overall operation and stable growth for long-term maximum benefits of the shareholders.

1.2 Code of Conduct on Responsibility for Employees

The Company shall perform according to the relevant laws and standards and treat the employees and staff members with fairness and respect for human rights, i.e. determining fair remuneration and other benefits, arranging welfare not less than the law requirements or more as appropriate, supervising health and sanitation, and safety for the employee's life, body and properties in working and workplace, training for providing knowledge, developing potentials and promoting progress, including giving the employees the opportunities to develop work skills, and equally encouraging the employee participation in expression of opinions and suggestions at every level. The channels are opened for the employees to clarify or complain about the offences, events or situations that affect working in other areas.

1.3 Code of Conduct for Responsibility for Customers

The Company shall perform according to the relevant laws and standards, take into account quality, safety, fairness, storage of customer information, fair compliance with contracts, agreements, or conditions with customers, not causing misunderstanding or utilization from the customer misunderstanding; not demand, not receive or not give any dishonest interests to the customers. In addition, the Company maintains good and sustainable relationships, aims for the creation of customer satisfaction and confidence to receive good quality services under the appropriate safety and technology, as well as continuously and seriously upgrades the standards to be higher, systemizes customer services, allows the customers to complain the product and service dissatisfaction, observe the Complaints Policy of the Company and rapidly fulfill the customer needs.

1.4 Code of Conduct for Responsibility for Trading Partners

The Company's practices to trading partners according to contracts, agreements, or conditions with trading partners shall be strict, equitable, fair, and based on fair receipt of return for both parties. In the case of failure to comply with the conditions, the Company shall urgently negotiate and notify the trading partners in advance to mutually find the corrective and preventive guidelines for the non-occurrence of damage, not demand to receive, not receive, or not give any dishonest interests to the trading partners.

1.5 Code of Conduct on Responsibility for Trading Competitors

The Company shall comply with the framework of good competition rules, not seek the confidential information of the trading competitors by dishonest or improper means, and not discredit the trading competitors with adverse and false allegations.

1.6 Code of Conduct on Responsibility for Trade Creditors

The Company's practices to the trade creditors according to the contractual conditions shall be equitable and fair, including strict repayment of principles and interests and collateral supervision under the relevant contracts.

1.7 Code of Conduct on Environment-Focused Social Responsibility

The Company shall cultivate consciousness of social and environmental responsibility for the employees at every level by caring, preventing, not creating or causing negative impacts on the environment, covering the energy consumption, such as water supply consumption, electricity consumption, renewable resource consumption, discharge and management of waste derived from business operation, emission of greenhouse gas, etc. The Company formulates the preventive/corrective measures upon occurrence of environmental and community impacts as the result of the Company's operations.

1.8 Code of Conduct on Responsibility for Government Sector

The Company emphasizes government sector agencies which are regarded as one of the Company's stakeholders, therefore, it has formulated the guidelines for practices government sector for proper execution of the employees and collaborated with the government sector agencies to avoid the execution that may affect the inappropriate acts with the following practical guidelines.

1. Not performing any acts that may induce the employees in government sector agencies to take improper and inappropriate actions.

2. Strictly comply with the relevant laws in various aspects for environment, safety, labor, taxation, and account management, including sets of regulations and notifications of government agencies.
3. Collaborate with government agencies in terms of academic matters and activity support, as well as hear the opinions, suggestions, or complaints of the government agencies.

2. Code of Conduct for Directors, Executives and Employees

The Board of Directors realizes the importance of business operation and management with virtue and ethics and complies with laws as well as takes economic, social, and environmental responsibilities for acknowledgement and observance of the directors of the Company, executives, and employees in the same way by adhering to the principles of integrity, diligence, and prudence for maximum interests of the Company and all related parties under concern on the overall stakeholders. Therefore, the Company has established the following codes of conduct.

2.1 Director Code of Conduct

1. Perform the duty with responsibility, integrity, transparency, and fairness with all related parties, and mainly beware of maintaining the Company's interests.
2. Comply with laws, the Company's objectives and Articles of Association, the relevant notifications and resolutions of the Company's directors, as well as the resolutions of the Shareholders' Meeting.
3. Perform the duties in the Company's businesses and undertakings straightforwardly and independently from the Management and the groups with interests, and must not have self-interests related to business decision-making.
4. Perform the duty using his/her full capability and not hold the office in other entities that operate the same type of business, or have a nature that is competitive to the Company's entities, unless a notice is given to the Shareholders' Meeting before resolving for appointing and maintaining the confidential information of the Company and stakeholders to avoid leakage to the non-related parties, possibly causing damage to the Company or stakeholders.

2.2 Executive Code of Conduct

1. Perform the duty according to laws, sets of regulations, regulations, policies, or requirements relating to the determined scope of practices to the organization, with diligence, prudence,

integrity, and fairness for maximum benefits of the Company, customers, shareholders, and employees.

2. Completely and timely disclose the actual status of the Company to the directors and shareholders, not seek interests for himself/herself and other related parties from his/her position, and not disclose the Company's confidential information.
3. The director shall be assigned by the Company in the case of giving information or interviews to mass media or the public.
4. Not operating a business that is competitive with the Company or may cause a conflict of interest with the Company.
5. In performing the related party transactions, the transactions must be considered for approval by taking into account the Company's maximum benefits and legality.
6. Govern the superiors with kindness, and fairness, and not use authority in a wrongful undertaking, and encourage the superiors to be stable and progressive in their jobs.
7. Provide knowledge, give counsel to the superiors, and hear the opinions and suggestions from the superiors with willingness and sincerity.
8. Participate in social and community organization activities by properly collaborating and assisting for the reasonable position and occasion.
9. Not collaborating or supporting any activities with the objective that harms good morals or provokes all vices.
10. Respect the rights and opinion expressions of the employees.

2.3 Employee Code of Conduct

1. Properly perform the duty according to laws, policies, rules, and orders of the Company with integrity, virtue, and a good attitude toward the Company.
2. Perform the duty with knowledge and competency, efficiency, and standards that should be available in the position and job with attention and responsibility.
3. Appropriately behave himself/herself as the Company's employee, maintain his/her and the Company's reputations, and have the rightness in terms of manners, etiquette, demeanor, and dressing to create his/her and the Company's credibility.
4. Maintain the Company's interests, not perform any acts causing the Company's losses of benefits, not embezzle the Company's interests to be self- or other persons' interests, not defame or give information that discredits the Company.

5. Maintain the properties and take responsibility for utilization of the Company's properties for maximum benefits and maintain the Company's properties not to be damaged.
6. Keep secret, not disclose the Company's information or news which still should not be disclosed, and not give news or any information not permitted by the authorized commanding person.
7. Take part in working to be well successful by giving advice and assistance which are useful for the operation of the colleagues.
8. The employee may receive or give gifts or entertain according to traditions or festivals, without impact on any decision-making in business. If it is the receipt of a gift, its value must not exceed 3,000 Baht. If its value is excessive, the employee shall report his/her superior for acknowledgement respectively.
9. Not do the business using the Company's name or have gains and losses with the related entities of the Company or falsely claim to use the Company's reputation in his/her or other persons' entities either directly or indirectly.
10. The operation and execution should not be directly and indirectly carried out in the Company's businesses that are competitive or in conflict with the Company's interests.
11. Honor each other, and treat fellow employees with good courtesy, sincerity, and collective harmony, assist and patronize in the rightful and useful way for the Company's works, and transfer working experiences to the hierarchical colleagues and subordinates.

Part 3 : Relevant Policies

For clarity and convenience of the directors, executives, and employees in operation under the framework of laws, rules, and regulations, and aligned with the Principles of Code of Conduct, therefore, the Company establishes the policies for observance of the directors, executives, and employees and their transparent, fair, obvious and verifiable operations with the following details.

The relevant policies are as follows:

- 3.1 Anti-Corruption Policy**
- 3.2 Whistleblowing and Complaints Policy**
- 3.3 Conflict of Interest Management Policy**
- 3.4 Policy for Reporting on Interests / Securities Holding**
- 3.5 Insider Trading Governance Policy**
- 3.6 The Company's Property and Personal Data Care and Utilization Policy**
- 3.7 Risk Management Policy**

- 3.8 Human Rights Policy**
- 3.9 Policy for Giving or Receiving Gifts or any other Benefits**
- 3.10 Internal Control, Internal Audit, and Financial Reporting Policy**
- 3.11 Policy for Security of Information Technology System Information Usability**
- 3.12 Business Confidentiality and Intellectual Property Protection Policy**
- 3.13 Environmental Care Policy**
- 3.14 Safety, Occupational Health and Environmental Policy**
- 3.15 Employee Conduct to Other Employees Policy**
- 3.16 Policy for Exercising Political Rights**

3.1 Anti-Corruption Policy

The Company emphasizes prudent business operation in the matter of corruption by adhering to compliance with the Corporate Governance Code for the maximum benefit of the shareholders, stakeholders, and related parties. Therefore, the Company established the Anti-Corruption Policy to use to adhere to the practical guidelines as follows:

1. The directors, executives, and employees must not perform both direct and indirect corrupt practices, such as proposing promising, requesting, claiming, demanding or receiving the interest, giving interest, persuading to illegitimacy, or breaking trust, or any acts that are corruption, etc. for self- or other persons' benefits.
2. The directors, executives, and employees must comply with the Anti-Corruption Policy and Measures and comply with the Anti-Corruption Law. If they breach this Policy, they shall be disciplinarily punished and taken for legal proceedings as the case may be.
3. The directors, executives, and employees have the duty to monitor and prevent corruption in the Company. If they detect corrupt practices or acts that may cause corruption, they must immediately notify the circumstance or report to their superiors or may notify via the whistleblowing channels determined by the Company.
4. The Company shall keep the details of the informant as confidential. The informant who performs with good intention with the Company, and sincerity, including the person who denies the corrupt practice shall be protected from the Company and not be affected by such practice.
5. Establish the policy and practical guidelines to prevent any forms of corruption, such as political assistance, charitable contribution, provision of subsidy, payment of gift cost, hospitality service fee,

etc., and arrange governance and monitoring in such matters to be transparent without conflict of the relevant laws, or improper and inappropriate promotion.

6. Systemize the adequate and appropriate internal control system to prevent corruption and operations that are not in line with the Corporate Governance Code.
7. Arrange the appropriate corruption risk assessment and anti-corruption measures.
8. Arrange the communication channels for the employees and stakeholders to recognize the Anti-Corruption Policy and enable them to notify clues, complaints, and suggestions to the Company for acknowledgment to investigate facts according to the process and take them for correction and improvement.
9. Arrange the development of a personnel management system, and create anti-corruption values and culture by communicating and publicizing knowledge for acknowledgement and understanding of the personnel on the Anti-Corruption Policy and Practical Guidelines for Ethics.
10. The procurement must be transparently carried out without conflict of laws and operation procedures determined by the Company, and the audit of procurement operation must be regularly conducted.

3.2 Whistleblowing and Complaints Policy

As the Company has had the Anti-Corruption Policy, therefore, it has established the Whistleblowing and Complaints Policy to make the accomplice of anti-corruption ensure that the Company has transparent, safe, and fair whistleblowing and complaints channels and processes for the whistleblowers or complainants.

3.2.1 Scope of Whistleblowing and Complaints

When it is in doubt and believed or there is reasonable ground to believe in good faith that there is an act that is dishonest or not transparent or violates the good rules on:

1. Policies, practices, requirements, or criteria of the Company
2. Good corporate governance, code of conduct, and ethics of the Company
3. Laws and official requirements

3.2.2 Protection

1. The Company shall keep the information and details of the whistleblower or complainant and the complained person confidential or may disclose to the related parties of investigation or the related parties in the limit only. However, the Company shall prudently consider the disclosure of any information by taking into account the safety and damage of the whistleblower or complainant, source of information, or related parties.

2. The Company shall appoint the Investigation Committee to mutually consider clues and complaints with prudence, carefulness, and fairness for every party.
3. In the case where the complainant or cooperator in fact verification deems that he/she may be unsafe or may be in trouble and damaged, he/she can ask the Management or the Investigation Committee to determine the appropriate protection measures.

3.2.3 Appointment of Fact Inquiry and Investigation Committee

The Company has assigned the Managing Director to consider appointing the Fact Inquiry and Investigation Committee to function of gathering evidence and taking any actions in inquiring facts of clues or complaints, and suggesting the complaints correction and management guidelines. The investigation process must transparently and fairly take place. The Fact Inquiry and Investigation Committee comprises the representatives from the Company's departments or work Units that are:

1. Human Resource Department
2. Original Affiliation Department of the persons who are reported for clues or complaints.
3. Other Independent Departments or Work Units, such Internal Audit Unit

3.2.4 Whistleblowing and Complaints Channels

The Company determines the whistleblowing and complaints channels as follows:

1. Suggestion and Complaints Box
2. Reporting via the Company's Website www.rpcthai.com
3. Reporting via E-mail Whistleblower@rpcthai.com
4. By mail : directly sending to any person and at the following address
 - 4.1 Directors / independent directors
 - 4.2 Top executives
 - 4.3 His/her trusted superior at every level

RPCG Public Company Limited, 86/2 Sammakorn Place Building, Ramkhamhaeng Road, Saphan Sung Sub-district, Saphan Sung District, Bangkok Metropolis 10240

3.2.5 Dishonest Complaint

In complaints reporting and whistleblowing, and any statements or provision of any information, if it can be proven that the said act is dishonest, intentional, defamatory, slanderous, and distorted facts. In the case of the employee, he/she shall be considered for disciplinary punishment under the work regulations and

rules of the Company. In the case of the act by the third party including the act by the Company's employee, and causing damage to the Company, the Company may consider taking legal proceedings as the case may be.

3.3 Conflict of Interest Management Policy

To prevent the non-occurrence of conflict of interest, the Company establishes a policy for the directors, executives, and employees not to use the opportunity from duty or position to seek their self-benefits. Therefore, the following practical guidelines are formulated.

1. Avoid performing the connected transactions that may cause the Company's conflict of interest.
2. In the case where the directors, executives, or employees have performed the Company's connected transactions, the Company will execute as if the Company has performed with the third parties that make trading agreements in the same nature as the person of ordinary prudence should perform with the trading partners of the general contracts, who have bargaining power in trade which is free from the influence of being the directors, executives or related parties. The said directors or executives shall not be involved in the approval consideration.
3. In the case within the scope of being the connected transaction, the rules of the Company and the criteria of the Stock Exchange of Thailand shall be executed and the information in such matters shall be completely and adequately disclosed.
4. In the case where the directors, executives, or employees assume as the directors, partners, or consultants in other organizations, the holding of such office must not be in conflict with the Company's benefits or promote the organizations in which the said persons hold the office, and must not directly contradict with duty performance in the Company.
5. Not disclose the Company's secrets and/or inside information or seek the self-interests or other persons' benefits either directly or indirectly and whether they will obtain the interests in return or not. The directors and executives must not attend the meeting or abstain from votes for their related transactions that may cause the Company's conflict of interest.

3.4 Policy for Reporting on Interests (Section 89/14) and Securities Holding (Section 59)

Under Section 89/14 of the Securities and Exchange Act B.E. 2535 (1992) amended by the Securities and Exchange Act (No. 4) B.E. 2551 (2008), they have prescribed that the directors and executives have the duty to report their and the Company's related parties' interests. In addition, Section 89/16 of the Securities and Exchange Act has prescribed that the Company Secretary has the duty to report the interests to the Chairman of the Board of Directors and the Chairman of the Audit Committee for acknowledgement within

seven working days from the date on which the Company has received that report. Moreover, under Section 59 of the Securities and Exchange Act B.E. 2535 (1992), it has prescribed that the directors and managers who hold the office shall disclose the report for their, their spouses, and underage children's securities holding and changes in securities holding, and futures contracts to the Office according to the rules and procedures determined by the Office in the Notifications. Therefore, the Company has established practical guidelines for the directors and executives to adhere to the operation guidelines as follows:

1. The directors and executives have the duty to prepare the report for their, their spouses, underage children, and related parties' interests to the Company's Secretary to quarterly gather the report for interests and the report for changes in securities holding to the Board of Directors to make the shareholders and general investors assure that the directors and executives can manage and operate the business with integrity, clarity, transparency, and verifiability.
2. Prohibit the directors, executives, and spouses and underage children of such persons from trading the Company's securities before the Company's financial statements will be publicized to the public in the 1-month period before disclosure of financial statements.
3. In the case where the directors and executives, including spouses and underage children of such person purchase, sell, transfer, or receive the securities, they shall submit the report to the SEC within three working days from the date of purchase, sales, transfer or receipt of those securities under Section 59 to publicize to the shareholders for acknowledgement about the change.

3.5 Insider Trading Governance Policy

3.5.1 Insider Trading

As the Company has various related parties and stakeholders, it shall equitably and justly execute with everyone on an equal basis and prevent illegitimacy. The Company's personnel at every level as well as every related party who is informed of or may be informed of the inside information that has not yet been disclosed to the public should avoid the trading of the Company's securities that they are the directors or executives of that Company. However, if they will trade the Company's securities, they should carefully perform without the use of inside information that has not yet been disclosed in the Stock Exchange for trading. After trading, the trading of those securities should be reported by observing the set of regulations of the Stock Exchange of Thailand and the Office of the Securities and Exchange Commission.

3.5.2 Preventive Measures

For orderliness of compliance with the policy, the Company establishes the preventive measures as follows:

1. Prohibit the Company's directors, executives, employees, and staff members from disclosing the Company's secrets and/or inside information or seeking self-interests or other persons' benefits either directly or indirectly, and whether the interests in return will be obtained or not.
2. Prohibit the Company's directors, executives, employees, and staff members, including spouses and underage children of such persons from using the Company's inside information which affects or may affect the changes in the Company's securities prices which have not yet been publicly disclosed to purchase, sell, offer for purchase, offer for sales or persuade other persons to purchase, sell, offer for purchase or offer for sales of the Company's securities either directly or indirectly before the said information will be publicly disclosed whether such acts will be performed for self- or other persons' benefits or to allow other persons perform the said acts and they obtain a benefit in return. The violator will be punished according to the Company's disciplinary measures.
3. The Company has informed the executives to understand and acknowledge the duty of reporting on their, their spouses and underage children's holding of securities in the Company, as well as reporting on changes in securities holding to the Office of the Securities and Exchange Commission under Section 59 and penalties under the Securities and Exchange Commission Act (No. 5) B.E. 2559 (2016).
4. The Company has determined not to allow the Company's directors and executives, including the spouses and underage children of such persons, to trade the Company's securities in the 1-month period before public disclosure of the financial statements for acknowledgement.

3.5.3 Penalty

According to the penalty for improper insider trading, the violator shall be punished starting with a written warning, allowance and wage reduction, temporary suspension from work without pay, or may be dismissed. In addition, he/she shall reimburse damage to the Company in the case of monetary damage depending on the severity of the said offence or may be punished according to the law as the case may be.

3.6 The Company's Property and Personal Data Care and Utilization Policy

1. The Company realizes the importance of the use of the Company's properties which are the properties prepared by the Company for use in business operations of the Company. The executives, employees, and related parties have the duty to fully utilize the Company's properties and take responsibility for controlling, supervising, and maintaining the properties suchlike general persons of ordinary prudence, and not use the Company's properties for self- or other persons' benefits, unless permitted from the authorized persons in approval.
2. The Company's properties means the valued tangible properties and non-intangible properties that generate income and do not generate income, such as movable properties and immovable properties, including technologies, academic knowledge, information of title documents, rights, copyrights, patents, concessions, inventions, and intellectual properties, etc.
3. The personal data of the employees and the related parties in business operation, such as biography, health history, work history, contact information, other personal data, etc., must be kept as confidential, not be disclosed or reproduced, transferred to other non-related parties with non-approval of the data subject and non-violation of the rights according to laws.
4. Justly and honestly limit the appropriate personal data access, particularly for the authorized person as much as necessary based on the regular specific duty and task for the determined objective.
5. Store personal data as necessary under the appropriate objectives of laws, sets of regulations, or business needs.
6. Personal data must be prudently stored in computer or other electronic devices by taking into account security and privacy.
7. Personal data must be collected, used, and destroyed in a suitable period according to the conditions and requirements of the group of businesses or the relevant sets of regulations, and consistent with the Personal Data Protection Act B.E. 2562 (2019).

3.7 Risk Management Policy

The Company is willful to efficiently and effectively govern and support the development of risk management process to ensure that the business operation attains the set objectives and goals, stably steps, and sustainably grows to be consistent with the Corporate Governance Code to achieve such objectives. Therefore, the Company formulates the enterprise risk management policy as follows:

1. Every executive and employee has the responsible duty for risk management in their work units by involving in the development of a risk management process to prevent and mitigate contingent impacts and enhance the opportunity for business operation.
2. Encourage and create consciousness of every executive and employee to be aware of the importance of risk management and regularly and continuously put it into practice until becoming a corporate culture.
3. Promote the efficient risk management process to align with business operations, regularly assess and review risks according to the set plan and international standards, as well as continuously report the overall operation of risk management to the Audit Committee and the Board of Directors.
4. The purpose of this enterprise risk management policy is to encourage every employee to have practical guidelines for risk management, which are the same enterprise-wide standards.

3.8 Human Rights Policy

The directors, executives, and employees mutually observe the principles of human rights and strengthen the practices for everyone with respect, fairness, and concern for humanity dignity, and sexual equality, without violence, sexual harassment, and threat in every way, as well as respect for rights, liberty, and equality of the person without discrimination due to race, nationality, native land, religion, gender, age, skin color, language, belief, education, lineage, infirmity, political opinion expression, economic position, group participation or any other social status not related to operation or any other matters. Therefore, the Company has established the following practical guidelines.

1. Treat the employees with kindness and justice, take care, give importance to the development and transfer of employee knowledge and competency by giving the employees opportunities all over, and have equal and equitable remuneration.
2. Appointing and removal of employees including reward and employee punishment must be performed with equity, good faith, and based on knowledge and competency by strictly adhering to the laws, rules, and regulations related to the employees.
3. Arrange the all-around audit of human rights to monitor the human rights impacts that occur or may occur from business activities along the value chain to participate in avoidance, prevention, and mitigation of the occurring impacts, ensure that the practices to customers, trading partners and employees, and creation of the working environment. The joint venture shall not negatively affect human rights for the group of stakeholders and shall be the expression of social and environmental

responsibility, as well as be a good neighbor and boost an equality atmosphere to be occurred with the community.

4. Arrange the analysis and assessment of impacts that occur or may occur from business operations and human rights risks.
5. Communicate, publicize, and provide knowledge to create awareness for the related parties along the value chain for participation in practice and use as a guideline for a business operation with responsibility and respect for the human rights of every party.
6. Arrange the communication channels for whistleblowing or complaints relating to being violated with human rights, and being discriminated from business operation impacts by adhering to fairness which aligns with the principles of human rights, as well as information confidentiality.
7. Monitor and report the information of human rights impact assessment to the public for transparency.

3.9 Policy for Giving or Receiving Gifts or any other Benefits

The Company has established the policy and practical guidelines for giving or receiving gifts, entertainment, or any other benefits as determined in the Code of Conduct to be in the same way to efficiently and transparently create good operation standards. Therefore, the Company has established the following practical guidelines.

1. Giving Gifts or any other Benefits

(1) Giving conventional gifts or souvenirs can be performed without conflict with the relevant objects and local custom, such as for Thailand, not exceeding 3,000 Baht per person per occasion according to the Notifications of the National Anti-Corruption Commission, and should be in the form that helps promote the Company's image as follows:

(1.1) Calendar, diary

(1.2) The Company's products

(1.3) Goods used as the Company's public relations media

(1.4) Goods of the royal projects, goods of the royal idea projects, goods of the communities in the Company's operation area, charitable or public interest goods, or sustainable development supporting goods

(2) Not give gifts, souvenirs, properties, or any other benefits to spouses, children, or related parties of the government officers, customers, trading partners, and contact persons due to circumstances that may be regarded as representational receipt.

- (3) Giving gifts and souvenirs should be carried out to the same standards to avoid discrimination.
- (4) Giving souvenirs on important occasions of business, such as the date of establishment, and signing the business contract.

2. Receiving Gifts or any other Benefits

- (1) Not claim or receive gifts, properties, items, or any other benefits from the customers, trading partners, government officers, and related parties of business doing.
- (2) The value for receiving gifts or any other benefits according to mannerism or tradition must not exceed 3,000 Baht. If the value exceeds 3,000 Baht, the superior shall be reported respectively to consider return or further take other suitable actions. The Company should determine the procedures for receiving gifts or any other interests to ensure the compliance of the employees.

3. Entertainment

Spending for business entertainment, such as entertainment in food and beverage, entertainment in the form of sports, and other spending directly related to business practice or being commercial custom, can be performed, but it shall be reasonable spending and not affect decision-making on operation, or cause conflict of interest.

4. Charitable Contribution and Sponsorship

- (1) According to charitable contributions or sponsorship to any organizations that are registered according to law, the interests and considerations must not be taken into account, or are used as channels, the transparent contribution must consist of written evidence of receipt.
- (2) Charitable contributions or sponsorship to ordinary people must be authenticated.

3.10 Internal Control, Internal Audit, and Financial Reporting Policy

The Company has appointed KPMG Phoomchai Business Advisory Company Limited ("KPMG") as the internal auditor by considering the performance, experiences, standards, and independence of the internal auditor, and also giving suggestions on compliance with the relevant requirements, policies, and practices according to the determined audit plan for the internal control system, and monitor the improvement results of the internal control system, including the assessment guidelines of The Committee of Sponsoring Organizations of the Treadway Commission: COSO, to support the adequacy assessment of the Company's internal control system. The internal control system is classified into 5 parts as follows:

- (1) Control Environment
- (2) Risk Assessment

- (3) Control Activities
- (4) Information and Communication
- (5) Monitoring Activities

The Audit Committee has the duty to supervise financial reporting, internal control system, compliance with laws, and the Company's sets of regulations so that all parties of stakeholders are assured that the Company has complied with standards and laws, and adequately, correctly and completely disclosed the important information, and determined as the following procedures.

1. The Company establishes the appropriate and adequate internal control system to ensure that the Company operates the business by taking into account the operating efficiency and effectiveness, reliability, and correctness of the financial reporting, and compliance with the relevant laws, rules, and regulations.
2. Every personnel of the Company has the duty to support the work of the Internal Audit Unit, cooperate, and provide the correct and actual information to the Internal Audit Unit and the external auditor. In addition, he/she must strictly adhere to and comply with internal control and internal audit systems for efficient, effective, proper, and reliable operation.
3. The Company's Management is responsible for preparing the correct, complete, and timely financial reporting, and yearly and quarterly financial statements. The preparation shall be subject to the appropriate accounting policies to be in line with Thai Financial Reporting Standards and the relevant sets of regulations.

3.11 Policy for Security of Information Technology System Information Usability

The Company realizes the importance of information technology stability and security for the Company's business operation. Therefore, it has prepared a security policy for the information technology system usability to prevent risks or mitigate threatened risks that may cause damage or affect the Company's business. Thus, to ensure that the Company's information technology system maintains confidentiality, validity, and availability of standard information for up-to-date, efficient, and secure use in execution to conform to the international standards to be the practical principles and guidelines for the operation of every in-house executive and employee, the following procedures have been established.

1. Every in-house employee at every level has the duty to comply with the Computer-Related Crime Act B.E 2550 (2007).

2. Computer and information technology, including peripherals used in operation for the Company, are regarded as the Company's property. Every employee of the Company shall oversee and maintain properties and is not allowed to use them for self-benefit.
3. Information confidentiality is the classification and priority of information to prevent misuse of information. In organizing the information, the organizational security rating is determined by taking into account security risk level, value, and damage impacts that may be obtained from the service users, which can be classified into 4 levels as follows:
 - 3.1 Information that can be publicized is the information with the intention to inform the customers or third parties for acknowledgement.
 - 3.2 Inside information is the information for the use of organizational employees only.
 - 3.3 Confidential information is the specific information for the use of organizational employees only.
 - 3.4 Secret information is the most important information and may cause damage if it is publicized.
4. Responsible for preventing and supervising the Company's information system under his/her possession or responsible duty to avoid improper access of the unauthorized person and not to disclose the important business information.
5. Have discipline in the use of the Company's information system and communication devices not negatively affecting the Company and other persons, such as using as a tool to wrongfully access the information system, create damage to the reputation and properties, disturb or annoy the function of information system, intercept data, smuggle to decode the password, counterfeit the computer data, publicize inappropriate images, texts, or voices, and not use them in personal business or illegitimacy.
6. Must not violate software copyright or intellectual properties of other persons.
7. Take precautions on usability and preserve personal computers and networks like ordinary people should perform in the usability of personal computers and networks as the case may be.
8. Prohibit from altering, duplicating, deleting, or destroying any of the Company's information without permission.
9. Use internet to search the information and knowledge that are useful for operation.
10. Prohibit from sending Email with the nature of junk mail, chain letter, or violation of laws or rights of other persons.

11. Prohibit from downloading any files or programs not related to his/her work which is not through the Information Unit.
12. Prohibit from installation of program or removal of any hardware other than the devices installed by the Company.

3.12 Business Confidentiality and Intellectual Property Protection Policy

The Company operates the business and encourages the employees to function under laws or requirements relating to intellectual property rights, such as copyright, trademark and trade secret, and other aspects as required by laws. The Company has established policies and practical guidelines as follows:

1. Every employee must not disclose the inside information or trade secret to other persons without permission and is prohibited from using the Company's information and trade secret for any self-interests.
2. Return, reward, or anything else obtained from preparing public relations media, published media, including media or things publicized to the public, or works assigned by the Company to make those things, shall deem that the return from those works and copyrights belongs to the Company.
3. The Company encourages and supports every employee within the Company to create works that are related to the Company's products in new features which is original from works with other persons' trademarks, copyrights, or patents.
4. The Company determines that the usability of the computer and network inside the Company shall align with the Computer-Related Crime Act B.E 2560 (2017). The Company has strictly observed the said matter.
5. Operate using the copyrighted computer program, and prohibit self-installation and use of computers, that are not through the Information Unit.

3.13 Environmental Care Policy

The Company aims for sustainable business operation based on environmental responsibility by realizing and giving importance to the mitigation of environmental impacts and promoting the provision of knowledge, cultivating consciousness on environmental conservation for the employees at every level. The following procedures are determined.

1. Support the creation of awareness by organizing training to provide environmental knowledge to the employees to create knowledge and understanding of climate change, natural resource conservation,

and the importance of the prevention of environmental negative impacts, including ecosystem impacts that will result in bad effects on biodiversity.

2. Comply with the environment-related laws and sets of regulations.
3. Continuously and thoroughly encourage employee participation in the implementation of activities and good environmental care, and boost the creation of good awareness in good environmental conservation, occupational health, safety, and working environment for the employees.

3.14 Safety, Occupational Health and Environmental Policy

The Company realizes the safety consisting of safety at work, occupational health, and working environment of the employees at every level by taking into account the impact on all parties of stakeholders, including communities and society, continuously developing and improving the quality management system to operate the business for sustainable growth. The Company has formulated the following practical guidelines.

1. Operate the business according to quality policy conforming to the relevant requirements and laws, and determine the personnel at every level to strictly adhere the compliance with the relevant laws, policies, requirements, standards, and operation manuals.
2. The Company considers safety, occupational health, and the working environment as the duty and responsibility for every employee's operation. Every superior shall be a good model and leader to support and encourage the employees to be aware of safe working.
3. Strictly govern the operations of the employees, business partners, contractors, and visitors or persons who come to operate inside the Company to comply with the policies, and sets of regulations in terms of safety, occupational health, and environment.
4. Support the resources in the matters of personnel, time, and budget, and promote, persuade, and train the audit of safety and other activities to improve working conditions and environment for safety.
5. Develop the employees to have knowledge by organizing training and promoting knowledge and understanding of self-practice requiring control, supervision, and prevention of non-occurrence of the potential damage or loss as the result of accident, fire, or injuries arising from the operation, as well as take the precaution of non-occurrence of loss or damage to the Company's properties, and create consciousness for the employees at every level to be aware of the importance of safety, occupational health and working environment works.
6. Promote health and occupational health for quality of work life and healthiness of the employees at every level.

7. Communicate with the executives and employees to have knowledge and understanding on the creation of awareness on the importance of occupational health and safety works.
8. Boost the creation of consciousness on safety at work to be the duty and responsibility of the executives and employees at every level. The Company shall integrate the cooperation in occupational health and safety management, and govern the operation inside the Company for maximum interests.

3.15 Employee Conduct to Other Employees Policy

The Company establishes a policy for employee conduct and conduct to other employees to ensure the employee's carefulness of their conduct and their conduct to other employees and prevent no acts that may violate a set of regulations, rules, and regulations relating to working. The Company has formulated the following conduct guidelines.

1. Cultivate consciousness in duty performance of every employee to perform the duty with integrity, honesty, and transparency.
2. Refrain from giving high-valued gifts to superiors or receiving gifts from subordinates.
3. Respect for the rights of other persons, including Management, not criticize in a manner that causes damage, and not claim other person's achievement as his/her achievement.
4. The superior should behave to be respectful of the employees, and the employees should not perform any acts that do not respect the superiors.
5. The employee should politely and equally behave with other employees or other persons without discrimination even though he/she is different in nationality, race, class, gender, age, religion, creed, social status, or illness.
6. The employee should be a disciplined person and behave according to the organizational rules and good tradition whether specified in writing or not.
7. Mutually create and maintain an atmosphere of harmony and solidarity among the employees. Any acts that may have an impact on the Company's reputation and image or are questionable for the Company later, should be avoided.
8. Refrain from giving or expressing opinions to third parties or mass media or any acts that have an impact on the Company's reputation and image or are questionable for the Company later.

3.16 Policy for Exercising Political Rights

The Company supports the directors, executives, and employees to have rights and freedom to participate in social activities by avoiding any improper acts, conflict with laws or morality causing an unpeaceful society, and maintains their honor and dignity to be accepted as it should be for status in society and community where the Company is located, by establishing the following practical guidelines.

1. Adhere to democracy, and encourage the exercise of rights under the constitutional law and other relevant laws.
2. The Company emphasizes political neutrality, non-involvement, and non-devotion to any political party, group of political allies, or any politically powerful person.
3. Encourage every employee to have political rights in his/her name without the need to take any actions, causing the Company's loss of political neutrality or damage from involvement, such as the use of position in the Company or name or logo of the Company or dress with employee uniforms making other persons understand that they are the Company's employees.
4. Not using their authority to command or persuade by any means causes the political involvement of employees or subordinates in every type of political activity, possibly creating a conflict of interest inside the organization and causing damage to the Company in every case.
5. Not giving the Company's financial, property, personnel, or property support for use in political assistance either directly or indirectly for the interests of the politicians, political parties, and group of political allies, for the interests of the Company, and promotion of the Company's business.

Part 4 : Supervision for Code of Conduct Compliance

The Company assigns to the duty and responsibility of every director, executive, and employee who shall acknowledge, endeavor to grasp, and strictly observe the policies and procedures determined in this Policy.

A non-compliance with the principles and practical guidelines determined in the Company's code of conduct may be a disciplinary or legal offence as each case may be, and may be considered for punishment according to the established rules.

If the employee detects the legal offence, and/or Corporate Governance Code as determined in this Policy, he/she shall report the complaint or allegation to his/her trusted superior at every level, the Human Resource Department Manager, the Company's Secretary, member of the Audit Committee. However, the Company will proceed with the verification without disclosure of the whistleblower's name to protect the contingent impact on the said whistleblower.

Part 5 : Penalty

The Company has determined the penalty for the person who breaches business ethics and code of conduct as follows:

- 1) Verbal warning;
- 2) Written warning;
- 3) Deduction of pay or suspension from work without pay
- 4) Dismissal

The Company shall consider punishing based on the degree of committed offence accompanied by the history, behavior, and intention of the offender. The Company may punish according to any or several clauses at the same time without the need to punish in the aforementioned sequence.

Every executive and employee has the duty to comply with, and encourage other persons to comply with working ethics and practices. The following acts shall be regarded as a breach of ethics.



Chairman of the Board of Directors
RPCG Public Company Limited

“Code of Conduct and Business Ethics Manual” Observance Agreement Form

RPCG Public Company Limited

- 1) I have already received and read the "**Code of Conduct and Business Ethics Manual**".
- 2) I have understood and agreed to adhere to the "**Code of Conduct and Business Ethics Manual**" of the Company as the rule of operation.

Signed

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(.....)

Employee Code

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Date

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- Remark** If you require any additional clarifications and explanations of contents that appeared in this Volume.
- For directors and executives, please contact the Company Secretary at Tel. 080-4414242.
 - For employees, please contact the Human Resource Department at Tel. 061-4454848.