



บริษัท เหล็กแผ่นรีดเย็นไทย จำกัด (มหาชน)

THAI COLD ROLLED STEEL SHEET PUBLIC COMPANY LIMITED

Code of Conduct

❖ Purpose

Above the existing policy, systems, modernize and proper technology and competent and orderly employee, the Company believes that the Company shall achieve the highest success of the business goals by conducting business with ethics and integrity for the growth and longevity in business of the Company. So it is the most necessary for every level of the employee including directors, to conduct in business through ethical practices and the professional manner that respect the good ethical conduct in the way of creating and comply with the philosophy and ethics when conducting the Company's business.

The Company requires all employees and directors to comply with "Code of Conduct" on a regular basis, respect and adhere to the employee's principles and create a corporate culture that leading to the highest glory and the success of the Company and all employee forever.

❖ Definitions

1) The Company	means	Thai Cold Rolled Steel Sheet Public Company Limited
2) Director	means	Persons appointed as directors of the Company
3) Employee	means	Persons performing their duties under an employment contract or as specified in the regulations
4) Superior	means	Employees with subordinates at all levels
5) Executive	means	Employees with the position of general manager or higher
6) Stakeholder	means	Shareholders, Employees, Customers, Suppliers, Competitors, Creditors, Public Sector, Private Sector, Society, Community and Environmental Management or those affected by the operations

❖ Scope of responsibility

1) Scope of responsibility of the Company

Responsibilities

- Set clear guidelines for conducting daily business activities to all employees for acknowledgement.
- Take the principles of ethics and business ethics of the company in this Code of Conduct to practice.
- Carry out distribution this Code of Conduct to all employees.
- Conduct communications and organize training programs to ensure that all employees are acknowledged and understood such business ethics.
- Conduct consultation on various policies and procedures to all employees continuously.
- Enforce compliance with this Code of Conduct.
- Ensure that there will be no revenge in the event of a reported violation of the Code of Conduct or Company policies and procedures.
- Assign all superiors to comply and implement this Code of Conduct.

2) Scope of responsibility of Superior

Responsibilities

- Ensure that actual employees and all new employees under their supervision obtain this Code of Conduct handbook, and have been trained to understand the meaning and the implementation, and have signed their acknowledgment, and return the letter of consent which appears on the last page of this Code of Conduct. Such a letter of consent is collected together in the employee's profile file.
- Conduct periodic reviews of the Code of Conduct with employees under their supervision and to ensure that “review” courses are provided to employees when needed.
- Collect the questions that related to this Code of Conduct to forward to the ethics officer and ensure that any concerns of relevant employees will be followed up.
- Take action to enforce the Code of Conduct. as well as various policies and procedures which support such business ethics.
- Maintain a work environment that encourages open and honest communication on matters related to upholding and following the Code of Conduct without the suspicion of revenge.

- Perform their duties as well as the supervision of various agencies including the overall activities of employees in their responsibilities in accordance with the Code of Conduct by acting as an example.

3) Scope of responsibility of employee

Responsibilities

- Regularly review knowledge and understanding of the Code of Conduct.
- Promote this Code of Conduct as well as policies, procedures and practices which help to support the daily operations of employees.
- Help each other to support a work environment that will lead to the continuation of the Code of Conduct.
- Seek help when there is an inability to recognize or there is a lack of clarity in the proper conduct of activities.
- Must be vigilant and alert in situations which may lead to actions that are illegal, unethical, considered a violation of the said business ethics. Or it may be an inappropriate action towards employees.
- Encourage employees to have discussions with superiors or even discussions with ethics officers when it appears that they may be in danger of violating the Code of Conduct or policies and procedures.
- Report to the Company any actions that occur or have been observed that violate the Code of Conduct or policies and procedures.

Chapter 1 Personal Conduct and Our Work Environment

Principle Commitments

Employees should be aware of workplace environment capturing ethics, safety and respect each other, starting from all employees are responsible for their actions and deal business operating with ethical issues under the frame of Ethics and Integrity responsibility and contributing their performance extremely with promptly in action, prudence, diligence, enthusiasm, consciousness, rational view of knowledge, not use emotions and ambitious learning.

All employees adhere to the Company “Code of Conduct” strictly. Violation of any of this Code could result in disciplinary action.

Practice Guidelines

1. Employee should respect, cooperate, willing to help for customers, contractors, suppliers, other employees and public society.
2. Employee should not underestimate, blame the Company and other employee including quote as the Company representative for his/her own interests.
3. Employee should not underestimate, threaten, separate, sexual or obscene abuse to other employee or personal dealings with touch and verbalization.
4. Employee should not steal, seek, use or disclose any sort of data, funds, assets or information that belongs to the Company no matter what are proprietary information or not, except receiving the approval from his/her superior.
5. Employee should not spy telephone or record conversations, transfer of data, communicate without sound, disclose information or wording, the using of telephone or communicative equipment except that customer or the Company agree to such doing or having permission by laws and regulations.
6. Every employee is expected to be a role model according to Code of Conduct, Values and should not perform the discriminate morals, unlawful rules and working regulations of the Company.
7. Employee should not misuse his/her official position or the Company’s reputation acquired improperly interests.
8. Employee should not use the Company’s resources and working time in the manner consistent with another business.
9. Employee should not accept any gift or offer of hospitality in tradition or any other occasion in which having excess value normally from vendors or other person that may receive interests from his/her official position. In case of receiving such gift, that employee need to be very careful of the gift’s value, if it was excess value normally, he/she should report to his/her superior immediately for consideration to provide any action as the case may be.

10. Employee should respect, obey and honor to his/her superior, avoiding from commenting on his/her superior and colleagues that may damage to that person or the Company, nevertheless, employee should provide an opportunity and open mindedness to his/her staff or colleagues with unbiased sensibility and reasonable listening.
11. Employee should maintain and create the cooperation and hand in glove among the employees to help each other side by side for the benefits of the Company in common.
12. Employee should conduct his / her work with honesty and realize of duties standing above all things.
13. Employee should seek knowledge, continually apply knowledge to work usefully and share knowledge with colleagues for the employees' knowledge, skills and competency development and create the fundamental knowledge that shall be the factors of successes for the Company and their own.
14. Employee should cooperate and participate in the activities set by the Company for creating the supporting and harmony including the social activities that organized by the Company.

1.1 Harassment

Employee is responsible to keep work environment free of harassment. The harassment destroys and impairs work proficiency. The characteristics of the harassment include underestimation against the others that are illegal act so employees have to responsible for their own behavior and do not tolerate any harassment of the others.

Practice Guidelines

1. Employee should conduct with respect to the others and do not act in the manner of ridicule, disdain, threaten extortion or egotistical manner.
2. Employee should not act in the manner of incitement, slur or travesty which leading to be disunited.

1.2 Sexual Harassment

Definition:

Sexual Harassment means behavior or any action that shows or makes understanding in a form of requesting for sexual favors in which that action or behavior shall result to the decision of human resource management, such as recruitment, performance assessment, salary increasing, promotion, assignment, time management, working condition or career path development, intimidation or sexual resistance, sexual abuse or coercion against any person in the workplace.

The example of sexual harassment, include unwelcome courting, gestures of a sexual nature or language using or picture, voice or other potentially sexual orientation etc.

Practice Guidelines

Employee should not conduct any act of sexual harassment. In case of harassment finding or occurring, employee must promptly report to their superior.

1.3 Non-Discrimination and Equal Opportunity

Employee should always realize that business success based on admitting value and equal supporting to each others. Employee should contribute and maintain of the unanimity in workplace that everybody have equal opportunity in competency development and capability approach for work. Employee have to practice in those same guidelines to all customers according to the Company's policy, human rights, and related laws and regulations.

Definition:

Discrimination means unfair treatment to the others by using personal judgment or private relationship without consideration of competencies at work.

Equal Opportunity means ensuring equal employment opportunity without discrimination on the basis of age, color, nationality, race, cripple, disability, sex, religion, national origin, marital status, sexual attitude or social status.

Working condition means all existing circumstances including recruitment, approval of absence, benefits, employment, remuneration, promotion opportunities, work transfer, performance assessment, training, participating or joining in social activities, compliance with laws and regulations and termination etc.

Practice Guidelines

1. Employee who is responsible in the process of recruitment must consider the applicant according to his/her knowledge, proper competency without discrimination in hiring including any act that impact the other colleague's job condition or the candidate.
2. During the business process, employee should not discriminate to customers, vendors, competitors, government officials or any others that are prohibited or illegal.

1.4 Personal Interests

Outside Activities or Business, Financial Interests, Personal Relationships and Conflict of Interests

The Company support employee to participate in the activities and conduct to the private benefits above his/her duties but in the same time that employee should realize of the said activities must not impact to the activities under his/her responsibilities or decision making should be sharply with no bias and according to the Company's business objectives. Such conflict of interests may cause problem to the Company's work

and employee his/herself, which leading to inferior equality services. The most apparent business of the Company and employee is the most advantages to customers, shareholders, and the Company including avoiding from inappropriate authorization using.

Practice Guidelines

Employee should not conduct his or her personal and business affairs in a manner that appearance of a conflict arise either direct or indirect interests of the Company.

Definition:

Conflict of Interests mean any action or activity that might conflict or appear to conflict with his or her private interests with the interests of the Company which may impair efficiency and causing bias in the activity all this the private interest may include the outside activity or business, financial interest, or private relationship.

- Employee's personal and business affairs.
- Employee's family member business affairs that may impact to the decision making for the business benefits of the Company.
- Employee's close person or having private affairs person that may impact to the decision making for the business benefits of the Company.

Practice Guidelines

Employee at all levels should declare of conflict of interests in the questionnaire provided by the Company or when occurrence of conflict of interests with the Company.

1.4.1 Outside Activities or Business

Practice Guidelines

1. To avoid the conflict that may happen between personal interests and the Company, employee should not work, consult or support the company or organization that are the competitors of the Company.
2. Employee should not use of the Company's resources such as assets, time, funds, information, records, intellectual property or specific information, computer, software and the Company's name etc. for the outside activities or business without permission from authorized person.
3. Employee must get approval from the President, or the Management Committee, or the Board Of Directors prior the election as manager of other business organizations.

1.4.2 Financial Interests

Practice Guidelines

1. Employee should not propose or accept any proposal related to personal loans, guarantee, discounts or benefits from suppliers including the Company's competitors.
2. Employee should not force or push the other employees for financial assistances to political organizations and use of the Company's resources for those activities.

1.4.3 Personal Relationships

Practice Guidelines

1. Employee must avoid even the direct or indirect relatives in the line of command except got permission from the authorized persons.
2. Employee must segregate the relationship between family member and close person with the job assignment, performance appraisal, promotion, compensation determination and employment guidelines.
3. Employee must not conduct business affairs with his or her family members or close persons in a manner that may appear a conflict of interests of the Company for avoiding the inappropriate situation that might be happen. Employee must disclose any relationships among his or her family member or any persons that may constitute a conflict of interests of the Company by reporting to his or her superior for acknowledgement.

1.5 Employee Privacy

Employee should base on mutual respect the privacy and not violate individual rights of his or her colleagues due to those actions could bring about being disunited and impact the work efficiency. Employee should realize that normally the Company will not examine private communication, computer using and will not inspect any area of workplace but the Company will conduct such actions to protect the Company's interests and / or whenever there is reasonable suspicion to believe that the Code of Conduct is being or has been violated by employee or to Personal Data Protection Act.

Practice Guidelines

1. Employee can search or use the other employee's private information for the Company's business only with permission.
2. Employee will disclose the other employee's personal information to assigned person for the business advantage in accordance with applicable laws or the Company policy.
3. Employee will hold personal information as necessary for the business efficiency only.

Remarks

In some circumstances the Company may inspect any area of workplace as necessary for safeguard of the other employee's property and life and Company property. The Company has reserved the rights to search any and all Company property at any time such as workplace, desks, briefcases, vehicles, e-mail, voice-mail, data information in computer, records and telephone recording of the Company including the property for the Company's communications with the outside etc. Normally the Company shall not regard of the Employee's outside engagement except potential conflicts of interest, availability for work, and any other factor that may prejudice the reputation or interests of the Company.

1.6 Workplace Safety, Alcohol and Drug Use, Workplace Violence, Weapons

Health and safety of employees, executives, directors, customers, vendors, contractors and other third parties in relation to the Company's activities are essential above all others. Employees should realize the impact of daily performance with the Company operations and will not place themselves or the others at risk situation inappropriately. Besides, employees should feel safe and secure in the workplace or during their works so every employees should regard the important of safety in the workplace also.

Practice Guidelines

1. Employee is entitled to follow the Company's safety instructions in using tools, equipments and work environment. All employees must not use or assign the others to use those tools and equipments with no training before using.
2. Employee has to use personal safety equipments according to the Company regulations.
3. Employee has to follow laws and regulations, traffic laws and the Company regulations related to vehicle using. In case of employees required having driving license, and if the driving license is lost, that employee need to report to the superior immediately.
4. In case of having hazardous materials in possession, employee has to manage, storage and use hazardous materials as identify in the manual, work procedures, the Company policy and procedures and related laws including must understand relevant the dangerous practices with hazardous materials.
5. Employee has to report to their superior and the section in charge of Safety and Environment Management related to the unsafe or dangerous status that may happen or occur including the report with no corrective action, besides employee must report the accident according to laws and regulations immediately, especially the accident with physical injuries.
6. When the Authority Health and Safety Officers contact to conduct the inspections of tools, equipments, places and operations, employee has to inform the authorized section of the Company to cooperate and make the appointment. The cooperation with the government official is needed.

1.6.1 Alcohol and Drug Use

The employee's achievement came from his/her willpower and active. Under the influence of alcohol or drugs or the improper use of medicine may impair the ability to perform the work. Such behavior shall harm the Company's reputation and may result in illegality and penalty.

Practice Guidelines

1. Employee shall not perform the work while being under the influence of alcohol, illegal drugs or any controlled substances.
2. Employee should not drink alcohol during working time which may cause dangers to his/herself or others or may affect to the Company or employee's reputation.
3. Employee should not possess, sell, use, produce or distribute illegal drugs or any controlled substances.
4. During performing the work, employee should not drive or use the Company's vehicle or his/her own vehicle while being under the influence of alcohol, illegal drugs or any controlled substances besides, employee should not keep illegal drugs or controlled substances in workplace and the Company's vehicle.

5. During working time, employee who is taking legally prescribed drugs that such drugs may lead to unsafe act for his/herself or the others, should inform the superior.

1.6.2 Workplace Violence

Practice Guidelines

1. Employee should not threaten to harm the other employee or others.
2. Employee should report their superior, Security Section and Human Resources and Administration Department when notice the suspected violation or behavior that may cause harms to the other health or life for prevention the occurrence of workplace violence.

1.6.3 Weapons

Practice Guidelines

Employee should not carry weapons to the workplace or during performing duties for the Company except receiving permission from the Company and the authority persons.

1.7 Environmental Protection

The Company is committed to the environmental impact created by the operation of the Company by considering on the employee and community's health and safety including the surrounding community. So in daily operation, employee should follow the Company's safety standards for the environment conservation at all times.

Practice Guidelines

1. Employee should perform their duties by considering on the environment consideration.
2. Employee should follow the requirements of the environment consideration when using tools and equipments or working.
3. Employee is required to follow laws and regulation or the Company policy in handling of the hazards or toxic waste.
4. Employee is required to follow the pollution control system.
5. Employee is required participating in the Company's project related to the environment protection and conservations of such as recycle project etc.
6. Employee should consider the impact of environment in procurement such as toxic substance, expenses and management, storage and destruction including the opportunities of recycle etc.
7. Employee should report to Safety and Environment Section of the Company when occur the unsafe condition or danger to the environment, health and security of employee and others such as slop leak and other emergency situation.

8. When the authority person or related officer contact to request the information or investigate the environment condition, employee shall inform the authorized section of environment, health and safety of the Company to communicate and make the appointment including give cooperation as being assigned.

Chapter 2 Protecting Our Company Assets

2.1 Property

Employee receives exactly trust from the Company for the proper use of Company property such as procurement, personal property and distribution due to that action can be affect to the financial performance evaluation of the Company. So, employee should engage the Company property for the worthy and efficient use and also ensure the proper maintenance.

Example of Property such as real estates, materials, tools and equipments, inventories, spare parts, funds, computer systems and equipments, software, vehicles, records or reports, assets and proprietary information, intellectual property, confidential data, commercial information and e- mail or voice mail etc.

Practice Guidelines

1. When the damaged property is found or acknowledged such as copy machine, other equipment, employee must report to related persons for further corrective action.
2. Employee must not take, use, sell, provide, borrow, lend or contribute Company property without permission that neither the property, nor its value, nor its condition.
3. Employee must not have a malicious intent to damage, sabotage or destroy Company property.
4. Employee must protect Company property according to the characteristics as the conduct of ordinary prudent relevant to the robbery, misuse and wrong type, destruction or sabotage, and also have to comply with the related regulations.
5. Employee must not use Company property for his/her private benefits or outside business that not relevant to Company business except having permission from superior and Company authorized person.

2.2 Funds

The Company fund management will directly impact the overall financial success of the Company so the efficient fund management will result to the adequate finance status to achieve the target and also protect misuse of funds and fraud so employee should be careful to manage the Company funds as their own and follow the good code of conduct for ensuring the efficiency and most advantages to the Company.

Definitions:

Company Funds mean cash, cheque, financial instruments, any documents or records that have a monetary value including precious things which are equivalent documents or records with monetary value.

Example of Funds include cash, cheque, credit card, account receivable, account payable, payment voucher, receipt, money order, postage stamp, stamp duty, benefit receipt form, refund right, good return list for expenses, financial instruments etc.

Practice Guidelines

1. Employee should protect funds and follow the conditions or approval the investment policy strictly and ensuring of the most advantages to the Company.
2. Employee should cooperate in using the Company funds or advance for the most advantages to the Company.
3. Employee should record funds transaction and related correctly and honesty. Employee who is authorized person should examine the said record preparing with accurately and timely including the spending properly and comply with regulations.
4. Employee should not use the Company business funds without the permission.
5. Employee should not use the Company fund for private benefit or any others that are not belong to the Company.

2.3 Records

The information recorded by employee shows employee's performance and leads to have an advantage over the business. The complete, accurate and valid information shall help the operations easily, economically and be able to determine the strategies of business. Besides, that information shall represent the employee effort with integrity and deliberateness, moreover, under the provisions of many laws and regulations impose the highly serious penalty on employee who misuse of information on the purpose, incorrect recording and does not fill in some necessary information in the Company's records.

Definitions:

Company records mean information or knowledge that the Company acquired from purchasing, production, findings, report or any actions including the information or knowledge that developed by employee during period of time or working time at Company.

Example of records include report, time record, payment voucher, benefit form, invoice, receipt, payroll record, working record, customer record, proprietary information or confidential information, performance evaluation record and other significant information record in neither computer nor document etc.

Practice Guidelines

1. Employee must prepare the Company record accurately and precisely.

2. Employee must not intend to report or record falsely or incorrectly including conceals or presents the false or incorrect report to the Company. When employee found the incorrect or wrong information, employee must report to Management for acknowledgement.
3. Employee must not change the Company records without formal permission.
4. Employee must provide or prepare the Company records to conform to all applicable laws and regulations both internal and foreign country (if any).
5. Employee must keep the Company records and conform to the requirements of laws, Company's policy and the necessary of business.
6. Employee must preserve and protect personal records and proprietary information that related to employee, executives, directors, customers, vendors, contractors, and joint-venture confidently when using that information except disclose to the permissive person to use those information and for related purpose only.
7. When employee found the fault of document and account, he/she must promptly report the superior and take corrective action according to the superior's command by credit, refund, or any other unanimity.

2.4 Time

The correct record and efficient using of working time are essential for customers and the Company. Those monitoring shall show the different between the medium and excellent working that contribute us to have the advantage over the business. If employee works with most worthy time and do not allow interests outside work to interfere the working time, it will lead the Company having a competitive advantage over the competitors and its higher competitive circumstances.

Definitions:

Working Time means the period of time to work, business trip, business activities or being representative of the Company.

Practice Guidelines

1. Employee must use working time efficiently and effectively as determined.
2. Employee must record working time correctly and precisely.
3. Employee must follow the section policy relevant to work schedule.
4. Employee must not perform or convince colleagues to engage in the other activities not related with the Company activities or business during the working time.

2.5 Intellectual Property

Ideas, creation of the mind and other information invented by employee are valued assets to the Company. This issue is the key of new product development and pushes to create new business opportunities. If employee does not classify and protects this intellectual property, the Company may lose exclusive rights, and competitive advantage over the business.

Example of Intellectual Property is technology with patent register or non-patent register, trademark, confidential trading, information with copyright etc.

Practice Guidelines

1. Employee must protect the company intellectual property by not disclosure before receiving permission.
2. Employee must inform the Company about the intellectual property invention (such as computer program, technology invention) including the proprietary information developed during working time or using the Company resources.
3. Employee must help the Company to receive the register of patent, copyrights or protect trademark that is the Company intellectual property.

2.6 Proprietary Information

Proprietary Information plays an important role of trade strategy and same applies to Intellectual Property so employee should realize that most information that developed by or being in the possession of the Company are confidential and prohibited to disclose without permission. The utilization and data storage are essential for competitive advantages and be able to ensure that the Company will be the leader in competitive market.

Definitions:

Proprietary Information means the information that belongs to or controls by the Company and consists of:

- Having economical value to the Company both present and future.
- Disclosure may be the advantage of competitors.
- Well-known in limit area and must not disclose to public.

Example of Proprietary Information includes inventions, programs, procedures, techniques, findings, development and creation, research, customers and employee data, construction plan, strategy, product and new service information and other technology, business and marketing plan, sale and marketing information.

Practice Guidelines

1. Employee should conduct, collect and classify proprietary information according to the Company regulations.
2. When employee sell or distribute proprietary information to other person, must get written approval from superior and law section including follow the non-disclosure agreement also.
3. In negotiation conversation relevant to proprietary information, employee need to be careful from eavesdropping, wiretapping or tape recorder especially should not have a conversation in a public place through all types of communicate tools or with family members which may lead to disclose to others.
4. Upon termination of employment status of the Company, employee shall not disclose and take any proprietary information.
5. Employee shall receive other confidential and/or proprietary information from the person that allowed disclosing information after receiving permission from superior and legal section only and if this information came from the competitors, employee should inform superior and legal section immediately.
6. Employee shall receive and/or use only the specific competitors' proprietary information that are generally disclosure, legal information or information that obtaining written consent from the competitor company only.
7. Employee must obtain the written permission from Director, authorized person prior making non-disclosure or disclosure agreement to any persons.

2.7 Communications and Computer Systems

Unless the Communications and Computer Systems are essential for the Company business efficiently, the Company's success will depend on the security and using of communications and computer systems properly.

Example of Communications and Computer Systems are communicate tools such as telephone, answering machine, facsimile, computer system, and network, data processing e.g. user ID and password, user rights inspector tools, office ID and password system.

Practice Guidelines

1. Employee should keep secret and the complete of Communications and Computer Systems, private ID, password, access ID, technology and Company information including must not use this technology without permission.
2. Employee must use Communications and Computer Systems in a responsible manner and will not cause the disunited, damage other people, destroy morale or support unfriendly in workplace.

3. Employee must not use Communications and Computer Systems in illegal activities or against the Company policy, not using internet or resemble in services that may cause damage, shame, untrustworthy or reputation damaged to the Company.
4. Employee should use Communications and Computer Systems for the purpose of business only, anyhow using for privacy in sometimes (such as telephone using, got message by answering machine, email, facsimile, private internet using) shall be able to do so if obtaining permission from superior and besides:
 - Should not impact to the job responsibility, and the Company business.
 - Should not involve with other business, special activities or related organizations (including solicit or promote the sale of any goods, and the political or religious matters).
 - Should not cause unreasonable expenses to the Company.
 - Should not violate this code of conduct or policy and procedures of the Company.
5. Employee must not connect over telephone or communication devices for the purpose of personal use and/or not the Company business.
6. Employee should record only the correct and the real information in the Communications and Computer Systems of the Company.
7. Employee should search, use, change, copy, delete or destroy proprietary information when having permission only.
8. Employee should keep secret information that recorded or used through the communications and computer systems and shall use this information (such as employee records) when obtained specific permission from superior and based on the business requirement within the scope of laws only.
9. Employee should protect the Company secret information (by encryption technology) that sending it through public network (such as internet) for avoiding the leak of the Company secret information.
10. Employee should check software, disks and data files received through the public network (such as internet) by using virus detection software to check before installation or using.
11. Employee should use the software that already obtained permission and employee can use public software or shareware with no expenses when received permission from Information Technology Department only.
12. When pause the computer or not being during working time, employee should log out of the system or use password to prevent the others to access.
13. Employee shall follow and comply with the policy including the regulations of the Company which related to the security network of the communications and computer systems frequently.

Notice:

The Company retains the rights to monitor technology using such as computer network, email or voicemail for checking the using accurately, accessing or using the system with permission and for the purpose of Company business truthfully and complying on the Computer Crime Act or any related.

2.8 Espionage and Sabotage

Company assets might be stolen or destroyed or used inappropriately by competitors or the others that try to destroy the company business and reputation so they must be well protected against espionage and sabotage.

Example of information that might be espionage and sabotage are computer password, location of system equipment installation, circuit diagram and the changing of data transmission in case of emergency, confidential information, technical and market research information, product development information, business plan, plans and marketing strategies etc.

Practice Guidelines

1. Employee shall use and let the other use the Company information and assets when obtaining permission and for the advantage of the Company only.
2. Employee should strictly prohibit unrelated person to the confidential information to get in the information storage. Employee must keep that information in safety place and having strictly security after using.
3. Employee must report to the Company section for acknowledgement when any person with no permission tries to get the confidential information or enter into the restricted areas of the Company.

2.9 Reputation

The Company's good name and reputation in providing customer services, product quality and customer treatment fairly have made many types of competency-based employees to the Company, having loyalty customers and being accepted by the government regulation section including shareholder and creditors which all of these being a part of helping the Company achieve success, however the reputation that hardly built may be lost easily due to some inappropriately activities. The business with other persons is the good chance to build good reputation for the Company, besides the Company success will depend on the employees to cooperate fully to maintain the Company reputation.

Practice Guidelines

1. Employee should use logos and symbols of the Company correctly as regulations and protect these valuable assets from improper using and/or without permission and promptly report to the Company responsible section when founding misused and misconduct.
2. Employee has to follow the policy, situation and internal guidelines of the Company when disseminating information outside.
3. Employee should consider with the Company's public relation, and related section for speech preparing, article, comment letter or other documents that will be disseminated to the public on behalf of the Company.
4. Works of souvenir issuing of certified documents, sale promotion activities by using Company name or on behalf of the Company, employee must have the permission from the related section only.
5. Employee should show clearly that his/her speech or writing is not relevant to the Company business, comment or done on behalf of the Company.
6. Employee should dress or use uniform provided by the Company and prevents from entering the entertainment or ruin places with uniform or dress representing the Company employee except entering upon his/her duties.
7. Employee should not conduct any activities that shall damage the Company or having danger to colleagues or themselves neither carelessness nor intention.

Chapter 3 Customer Relations

Definitions:

Customer is person who buys a product of the Company and pay for that product. To create the good relationship with customers shall mean the commitment into customers' satisfying-action for the Company's products and services continuously. Employee should treat to every customers like "the favorable person". Any customer treatment by employee may have a major impact on customer dissatisfaction, lead to those customers decrease or cancel to use the Company's products and change to support the competitors' business instead or dissemination to public related to that dissatisfaction and result damaged to the Company "Image" so every employees are needed to create and maintain good relationship with every customers by following the Company "Code of Conduct".

3.1 Knowledge / Skill

Practice Guidelines

1. Employee should know and understand the Company products that assigned as duties very well.
2. Employee should study and make understand customer requirements in details before making proposal to respond to customer requirements accurately.
3. Employee should give accurate and complete information to his/her customer.
4. Employee should have responsibility, keep interest in knowledge learning at all times and cumulative work experiences that are better utilized to increase customer satisfaction.

3.2 Quality and Productivity

Practice Guidelines

1. Employee should offer the Company's products that have quality and standard as provided by the Company.
2. Employee should treat customers with polite and honorable manner and use polite form of speech to customers according to the Company requirements.
3. Employee should practice with honesty and fair dealing, not cheat or take advantages against customers.
4. Employee should be on time and always keep appointment time with customers.
5. Employee should try to provide service exceeding customer expectations.

6. Employee should provide credible and trustful services, as always, adhere to and follow the service commitment given to customers. If not be able to do, employee must report to superior for seeking the next corrective action.
7. Employee should perform good personality, wear uniform provided by the Company or dress properly for business as well as be clean and neat including always keeping workplace clean.

3.3 Attitude and Manner

Practice Guidelines

1. Employee should have positive attitude with customer services, focus on the importance of customer services and service perform extremely, result value and efficient services which will bring to the excellence.
2. When customer has the problem or complaint, employee should be interested in, ready to listen the customer's problem with being considerate and willing to help enthusiastically which in turn affect customer impression.
3. Employee should not perform improper manner to customer, avoiding quarrel or argument against customer or expressing emotion such as boring or aggressive, annoyance, not interesting to service or show disrespect manner etc.
4. Employee should respect to the customer's decision and comment.
5. Employee should not offer or demand a return from customer besides the Company regulations.
6. Employee should not offer selling the products and services of non-Company group unless with permission.

3.4 Communication

Practice Guidelines

1. Employee should appear himself/herself as being the Company's employee every times when he/she meets or converses customers such as Employee-ID, name card, uniform or verbal identification.
2. Employee should pass the comments or information from customer to superior including proposes work improvement for the Company benefits.

Chapter 4 Fair Dealings with Others

4.1 Customers

Practice Guidelines

1. Employee should keep customer's secret or information confidentially by not interfering with or offending against.
2. Employee should use the acquired information related to the Company customers for the purpose of the business of the Company only.

4.2 Suppliers and other Representatives

Suppliers, consultant, distributor and other representatives are all the significant part of Company success. Thus, regard as value business partners which lead to proper and fair prices of purchasing with quality services. The Company has to approach business partners to desire doing business with the Company by making good relationship, honesty and reliability. To maintain good suppliers, employee should treat suppliers as the same way they shall perform to the Company.

Practice Guidelines

1. Employee should review and follow the Company's policy and procedures for procurement including find the proper guidelines prior the selection of suppliers, consultant, distributor and other representatives.
2. Employee should prepare contract or written agreement with details of specification and responsibilities of parties and send to legal section for checking before authorized signature.
3. Before doing business together, employee should inform suppliers, consultant, distributor and other representatives about their responsibilities being comply with the culture and the Company "Code of Conduct" including laws and regulations and related policies. Besides, employee should inquire more information on goods and services from Procurement Department as well.

4.3 Creditors

Support and trust from creditors are very important for the Company to create strong financial fundamentals. It is the policy and the missions of the Company to treat creditors with equality and fairness, provide information accurately and up to date including strictly abide by the trade agreement and contracts.

Practice Guidelines

1. Employee must be honest and follow the agreement condition which the Company made with all creditors based on the conditions including criteria and legal regulations.
2. Employee should monitor the Company to disclose financial information accurately including make payments on time.
3. If having any obstacle causing unable to follow the conditions, employee has to inform creditor immediately and jointly considers for the corrective action.
4. Employee should control the quality of collateral.

4.4 Investors

Investors are groups of persons who have play an important role in the existence of the Company and are a part of the success of company expanding. The continuous investment reflects on trustful image of the Company from investors.

Practice Guidelines

1. Employee should extremely aim at business operations with knowledge and skills management and with honesty and fairly to investors both major and individual investors for providing the benefits to all investors. Employee should be also responsible for investors regularly and emphasize in building business growth for the ability of long-term competition and aim to make proper returns to investors.
2. Employee should not seek benefits for himself/herself or third party by using any non- public information of the Company.

4.5 Entertainment, Gifts and Gratuities

The exchange of trade friendship in some opportunities such as give a gift, meals or provide entertainment is considered normal issue in showing of friendly and create trustful in doing business together, however employee should not accept these actions impact to intention and decision. In case of using good consideration and treatment with neutralization, the entertainment and gifts given should be proper, not be extravagant and have high value but all of this; employee is prohibited to demand or accept any compensation.

Practice Guidelines

1. Employee should not solicit entertainment, gifts or compensation for himself/herself or for any other person from persons with the Company actually or potentially does business.
2. When employee participates in business selection process, employee is prohibited to accept entertainment, gifts or compensation that may influence decisions of business selection or procurement of goods. These include employee who is responsible or has influence or decision- making

authority to make contract with suppliers. The exchange of trade relation with fair value will be proper when there is no intention to influence procurement decisions.

3. Employee should know the Company's exchange of trade relation policy and must not offer any proposal against the business partner policy.
4. Employee should inform the Company's exchange of trade relation policy and standards to suppliers for acknowledgement.
5. When employee conduct business with government officer, employee should know and comply with exchange trade relation standards of both sides by refer to the higher strictly criteria.
6. Employee should record and inform superior as the matter of facts in case of his/her family members or tenant receive presents or gain sympathy from the Company's business partners, customers, competitors etc.

4.5.1 Entertainment

Example of Entertainments those are acceptable and should be proper and occasionally:

- Meals
- Charity
- Sporting events
- Holiday party or banquet
- Any kind of entertainment such as theater and acting, films, concerts or festival etc.

Practice Guidelines

1. Employee should receive prior permission from superior before inviting or accepting invitation to welcome party.
2. Employee should offer and/or accept banquet that has been commonly business culture on occasionally and moderately which that event does not appear the decision-making or create the improper behavior of employee or business partner.
3. The banquet received or offered by employee should be mutual and moderate for avoiding the obligation that might be happen.

4.5.2 Gifts

Example of Gifts those are acceptable:

- Non-monetary gifts
- Gifts with a value less than 3,000 Baht from same source
- Sale promotional gifts with the Company logo (such as pens, hat, T-Shirt) etc.

- Gifts for general distribution (such as distribute to employee or other business partner's customers) etc.

Practice Guidelines

1. Employee shall give or receive gift for promoting the Company and business partner's reputation only and must not influence business / benefits decision-making or any improper actions.
2. Employee should politely return gift that has a value greater than 3,000 Baht with the explanation that the Company regulations do not permit employee to accept such gift. In case of the gift will be rotten or not be able to return, it could be received in the name of the Company and sent it to charity or further distribute to employees in the section.
3. When doing business in foreign countries or different cultures, it is good practice and proper business manner to exchange of trade-friendship by giving high value gifts. The giving or acceptance of such gifts, employee should report to superior for record as the Company's assets.

4.5.3 Gratuities

Example of Gratuities those are not acceptable:

- Cash or cash equivalents
- Money loan
- Privilege rights
- Personnel assistance
- Benefits
- Services
- Payment or give assistance as a bribe or benefits etc.

Practice Guidelines

Employee should not request for, accept or offer gratuities or payment that does not comply with the regulations. Employee must always recognize that the acceptance of the said gratuities, either money or favors may be considered bribery and violence against the Company's policy, laws and regulations in Thailand and other countries.

4.6 Fair Competition

The Company has trade competitive mission to strictly comply with laws by offering products and services with quality to maintain customers, suppliers including trade competitors' trust by doing business with ethics and integrity. The Company's business must comply with related laws and regulations. Employee has a responsibility to know the Company's standards, related laws including the applicable laws and regulations that will be notified and may impact on his/her duties in the future.

Practice Guidelines

1. Employee should promote selling of the Company's goods and services by comparing with the competitors' goods and services fairly and actually and do not distort the facts and make false about competitors include their goods and services.
2. Employee should not engage in spying, sabotage or bribery over trade competitors both at present or in the future competitors.
3. Employee should not engage in any contract or agreement that may unreasonably reduce or break down trade competitions.
4. Employee should give accurate and factual information related to the quality, efficiency, specification and ready to sell in goods and services for press release, advertising and public announcement.
5. Employee should respect customer in decision-making to purchase goods from competitor.

4.7 Competitive Information

It is necessary and proper to gather all market information including competitor's goods and services. The Company aims for fair competition and avoids making any agreement and memorandum of understanding in improper way so the Company shall comply with applicable laws and regulations, code of conduct, business culture and practices that are acceptable in social business.

Practice Guidelines

1. Employee should collect competitive information from sources as follows:
 - Public information source (such as printed articles, advertising, public documents, newspapers, journals and other public medias).
 - Engagement of trade and industrial activities (such as trade fairs, conferences and other trade activities).
 - Competitor research (in case of having information gathering of the results of competitor's research that be disclosed to customers. To use the said research results, employee should not mention for being his/her own research).
 - Result of trade information survey commissioned by the accepted consulting groups.
 - Information provided to customers and other public.
 - Specific agreement for customers.
2. Employee should not search for competitor's trade secret or proprietary information by illegal acts such as stealing, espionage or violation of nondisclosure agreement of competitor's information no matter information received from customer or other parties.

Chapter 5 Working with the Government

5.1 Government Relations

The communication with government officers as customers or authority will affect to the continuous success of the Company business. Thus, employees should avoid the inappropriate behavior and/or overrule by influence or unfair treatment to government officers. The violation of disciplinary guidelines may cause penalty and fine to government officers, the Company and employee by laws and regulations. Thus, employee should study legal regulations, government practice standards and make good relationship with honesty, respective and trustful background, and the Company's ethical standards.

Practice Guidelines

1. Employee should study and make understanding of both written and non-written government practice guidelines.
2. Employee is required to comply with the Company policies related to the supporting and participation in politic activities.

Chapter 6 Anti-Corruptions and Money Laundering Preventions

The company is committed to conducting business with good corporate governance principles and social responsibility. To create and maintain an organizational culture that adheres to all forms of corruption are forbidden and unacceptable. Therefore, all directors, executives and employees must not accept or take any action related to corruption in all forms either directly or indirectly including the prevention of money laundering. The Company will comply with the law on anti-corruption and anti-money laundering, both Thai law and the law of the country where the Company to conduct business strictly. The Company intends to support the fight against corruption as well as promoting and strengthening ethics, including communicating relevant policies and practices to customers, business partners, and stakeholders.

Practice Guidelines

1. Everyone must acknowledge, understand, and comply with the Company's business ethics manual strictly. If everyone commits an offense, disobeys, or does anything that violates the regulations of the company, he/she shall be judged and disciplinary action in case of a serious offense, may be considered dismissed according to the Company's work regulations or rules, the announcements, the orders that the company has set. In addition, everyone may be subject to legal penalties as the law stipulates.
2. Consulting and receiving complaints, the complainant can proceed according to the conditions or procedures specified in the work regulations or further procedures.