



SIAMRAJATHANEE
PUBLIC COMPANY LIMITED



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PUBLIC COMPANY LIMITED

Code of Conduct

Approved by the Board of Directors' Meeting No. 3/2019

Held on 19 June 2019

Siamrajathanee Public Company Limited | Head Office

329 Moo 10 Kusunong Samakkhi Soi 1, Old Railway Rd., Samrong, Phrapradang, Samutprakan 10130

บริษัท สยามราชธานี จำกัด (มหาชน) | สำนักงานใหญ่

329 ม.10 กุศลสงฆ์ ซ.1 อ.ร.รางสายเก่า ต.สำโรง อ.พระประแดง สมุทรปราการ 10130



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Code of Conduct

To comply with the good corporate governance principle of Siamrajathanee Public Company Limited (the “**Company**”), the Company has determined the standard of code of conduct for the managements and employees to comply with it together with the Company’s Articles of Association and rules by aiming that the management and operation of the Company shall be transparency, fairness, efficiency, honorable and prestige for the confidence and trustworthy of business partners, customers, and general public. Details of the code of conduct are as follows:

1. Business Ethics

The Company shall comply with and shall procure its employees to comply with the business ethics as follows:

- (1) To carry out the business with integrity, honesty and responsibility to the society in the area of laws, ethics, and attempting to do good for individuals, community, society and environment.
- (2) To treat customer fairly on goods and services without discrimination.
- (3) To carry out the business by implementing the standard operation system with good control and to use knowledge and expertise with discretion and sufficient information and evidences including to comply with laws and regulations strictly.
- (4) To not disclose the customer’s information received from the business operation of which such information under the normal circumstance, shall not be disclosed unless the disclosure will be required by laws.
- (5) To create channel for the customer’s complaint on the incomplete of goods and services.
- (6) To disclose information of goods and services accurately and completely.
- (7) To comply with terms and conditions of customers with fairness if the Company is not able to comply with the terms and conditions, the Company shall notify such customer to find the solution.

2. Best Practices of Executives

All executive officers shall comply with the rules, regulations, notifications and orders of the Company and the supervisors at the above level as follows:

- (1) To support the policy and compliance with the rules, regulations, orders, notifications or circular letter of the Company which have been announced to all employees for acknowledgment.
- (2) To perform duties with integrity and fairness including to report any circumstances that may create any damages in reputation and properties of the Company without delay.
- (3) Be polite, respectful and respectful to colleagues.





- (4) To perform duties with determination and compliance with rules and corporate governance of the Company to be the good example for all employees in order for the Company to be successful and to comply with morality.
- (5) To maintain the benefits and confidentiality of the Company, customers or other relevant business activities of the Company which shall not be disclosed strictly. For the disclosure of information regarding the financial business and the personal, the Company shall comply with the accurate and proper practice with the permission only and it shall perform with thoughtful and efficient. Therefore, during the employment and after the termination of employment, all employees shall keep the forgoing information as confidential information if any employees disclose or circulate to other person or use such confidential information other than the performance of duties for the Company, such employee shall be liable for any actual damage to the Company.
- (6) To maintain and prevent the assets of the Company from any damage or loss whether arising from persons or disasters including it shall not use any goods whether equipment or properties of the Company for personal purpose or benefit of third party.
- (7) To manage the business operation with morality and ethics including to support the creation of moral and ethics in all level of the Company and to monitor and solve any conflict of interest that may occurs in the Company.
- (8) To supervise subordinates closely with fairness and without prejudice.
- (9) To be ready to work as a team and be able to listen the opinions of others.
- (10) To comply with, support and supervise employees under the supervision to comply with rules, discipline, and Articles of Association of the Company in the usage of computer system, computer information, computer traffic information strictly in order for the usage of Company's computers to comply with the laws concerning computer, copyright or other relevant laws, and to prevent any damage on reputation and image of the Company.

3. Non-desirable Practice of Executives

All executive officers shall not perform their duties in any manners which will create any loss of the Company and himself or herself as follows:

- (1) Spending the Company's working time for other things or personal benefits.
- (2) To carry out the same business and such business is competitive with the Company's business whether for the personal or other benefits or being a controlling shareholder of such business that may create any loss to the Company whether direct or indirect.
- (3) Behave in any manners that may create any loss to position or reputation of the Company.
- (4) To inform or use inaccurate information or to not disclose accurate information to the Company.
- (5) To perform duties with negligence or take any actions which are inappropriate for the good duties of the executive to achieve the successful of works with integrity.





- (6) To not disclose or mislead the fact in order to receive the benefits for itself or other persons which may create loss to the Company whether direct or indirect.
- (7) To disrupt or act in any way that impedes the performance of the company's authority or issues any orders to employees to act unlawfully or unethically.
- (8) Breaking civil and criminal laws that damage oneself or others. Whether intentionally or not.
- (9) To disclose wages or salaries The rate of salary increases of themselves or of others. Whether intentionally or not.
- (10) To receive or consent to receive assets or other benefits from customers, traders, partners, competitors, or any other person who does business with the Company or hospitality, which proves that it exceeds the appropriateness, except for traditional gifts or business reception as usual, or the cost of promoting business that brings commercial reputation in exchange for fair exchange, they exceed the appropriate means of receiving assets or other benefits from customers, Traders, partners, competitors, or anyone else who does business with the Company or hospitality, which proves to be beyond reasonable, except for traditional gifts or business receptions, or the cost of promoting a business that brings a commercial reputation as a customary exchange, if they are worth more than THB 20,000, they must immediately notify the supervisor from the supervisor. However, if they exceed THB 20,000, they must be notified to the level supervisor immediately.
- (11) To bribes, either directly or through third parties, and/or improperly influence government agents; This conflicts with the Company's policies.
- (12) To take any additional, truncated or corrective actions in any record or information to alter or misrepresent performance and record the accounting to be intentionally misrepresented for any purpose.
- (13) Payment or management of the business with the intent or to understand that part of the payment or management of the business; There are purposes other than those specified in the document for payment or business management.
- (14) Being a person who is an insolvent or has any reasons under the laws to assume that there is an insolvent.
- (15) Does not maintain the intellectual property information of the Company or that the Company acquires from the performance of employee duties.
- (16) To infringe the works and intellectual property of others.
- (17) To perform any act that unlawfully exploits oneself or others.
- (18) To request the non-purchasing department for support from merchants or partners (if it is necessary to request such support for the benefit of the Company, the department shall discuss with the purchasing line to be responsible for the operation, except for marketing activities, marketing and business development are responsible).





- (19) To acts that neglect or facilitate any person who exploits or accesses or interferes with computer systems, computer information, information regarding the Company's computer traffic, abused or without the company's permission, or intentionally, supports, consents to the occurrence or existence of service provider offenses under computer law or copyright law or other applicable laws.

4. Imposing Penalties on Executives

- (1) Non-serious violations: Executives will receive a written warning letter that identifies the nature of the breach as well as the reasons that rely primarily on the breach, giving the executive the opportunity to dispute the allegations against the supervisor. If the issue is not resolved, present the matter to the Board of Directors for consideration and hold the decision of the Board of Directors finally. If there is a second violation, or the executive does not correct the offence from the initial breach as received the warning letter, the company will not be able to resolve the breach in the first place. Such executives will be subject to strict disciplinary action, which may include dismissal.
- (2) Serious violations, including the following violations, such as giving or receiving bribes, fraud, Disclosure of confidential information or intellectual property of the Company to third parties and any actions that degrade the Company's honor or conceal or not report any sensitive information, discussions or documents to supervisors. The Company may consider termination without compensation and without the need to issue a written warning letter first.

5. Best Practice of Employees

To support good environment of working and efficient, the employees shall comply with the following practices:

- (1) Employees shall work with integrity and due diligence and improve productivity. This is for the benefit of ourselves and the company.
- (2) Employees shall strictly comply with the company's work regulations and regulations.
- (3) Employees shall respect and obey supervisors who command favors the company's policies and regulations.
- (4) Employees shall respect their rights and respect each other, avoiding the disclosure of information or stories of others in terms of performance and personal matters in a way that will cause damage both to employees and to the Company.
- (5) Employees should avoid receiving any gifts that may make themselves uncomfortable on their duties in the future. If this is inevitable, notify the supervisor immediately.
- (6) Employees shall not use their position or benefit being received from the duties to earn any personal or third party benefits or to complete the Company's business.
- (7) Employees shall treat customers and business partners with integrity and equality.
- (8) Employees shall keep the information of customers, business partners and organization as confidential information strictly.





- (9) Employees shall report any information to their supervisor without delay after knowing that such matter may impact operations or reputation of the Company.
- (10) Employees shall protect the rights and benefits and properties of the Company in good conditions and it shall use such properties in full benefits, with efficient, and shall not create any loss or waste or deterioration before the appropriate period.

6. Disciplinary Actions

If any employees perform duties in manners that may create any conflict of interest with the Company, the Company shall consider it in accordance with the organization structure and work rules and each department can preliminarily consider the inappropriate manner internally and shall provide the result to the senior supervisor and relevant line of work for disciplinary actions with appropriate penalty. However, if such conflict of interest is serious and create significant damages and the responsible department cannot manage it, it shall propose this matter to the management of the Company for conclusion and determining the penalty.

Penalties

- (1) Verbal warning
- (2) Writing warning
- (3) Reduction of wage
- (4) Suspension
- (5) Termination without severance pay according to the laws concerning labor protection
- (6) Prosecution

This code of conduct shall be effective from 19 June 2019.

Announced on 19 June 2019

Siamrajathanee Public Company Limited

Signed.....

(Mr. Weidt Nuchjalearn)

Chairman of the Board of Directors

