



# Code of Conduct

CP Aextra Public Company Limited  
and Its subsidiaries



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## Message from the Chairman

True success for an organization is not measured solely by profits or business growth, but by the way we conduct ourselves with integrity, transparency, and respect for the value of every individual. These principles form the foundation of our leadership as a seamless B2B and B2C platform in Asia, driven by technology and innovation. We believe that **“sustainability”** begins with ethical business practices, alongside our commitment to enhancing quality of life and well-being in society at the heart of our vision and mission.

This Code of Conduct serves as a compass that guides us all in a unified direction. It is not only about compliance with laws and policies, but about **“Living the Code”** applying its principles in every decision, in every interaction with our customers, colleagues, and business partners.

CP Aextra can achieve **“sustainable excellence”** when everyone in the organization not only follows policies, but also takes part in cultivating a culture where **integrity, righteousness, and trust** are deeply embedded in every aspect of our work. I firmly believe that each of you is a driving force in shaping our company into a model of honorable and socially responsible success.

With confidence and commitment.

**Mr. Suphachai Chearavanont**

Chairman

CP Aextra Public Company Limited

# Part 1

## General Information





# Introduction

**The Code of Conduct of CP Aextra Public Company Limited (the “Company”)** serves as a guideline for the conduct of all Company personnel across every level of the Company and its subsidiaries. It aims to ensure that everyone acts appropriately, transparently, and responsibly toward all stakeholders, both inside and outside the organization.

This Code encompasses key principles such as ethical business practices, adherence to applicable laws and regulations, alignment with the Company’s core values, good governance practices, and the promotion of a culture rooted in transparency and accountability. It is designed to establish standards of conduct that reflect the Company’s mission and the expectations of modern society.

This Code of Conduct is more than just a document. It is a collective commitment by everyone in the Company to uphold integrity, honesty, and responsibility in all actions. By doing so, we contribute to the long-term sustainability of the Company, its stakeholders, and the wider community.

# Vision, Mission and Core Values

## Vision

“To bring about change for how life could be better fulfilled with good health, love, joy and wellbeing.”

## Mission

To become the number one B2B and B2C retailer in Asia, combining both online and offline platforms, by fulfilling our customers’ daily needs with technology, innovation and operational excellence, together with individuals and partners in a sustainable way.

## Core Values



Three Benefits



Speed with Quality



Simplification



Accept Change




Innovate



Integrity

# Guidelines and Compliance Enforcement

A close-up photograph of a hand sowing seeds into the soil. The hand is positioned on the left side of the frame, with fingers gently releasing a stream of small, dark seeds into a hole in the earth. The background is a soft-focus green field, suggesting a farm or agricultural setting. The lighting is bright and natural, highlighting the texture of the soil and the motion of the seeds.

The Company assigns all directors, executives, and employees (“Company personnel”) the responsibility to acknowledge and comply with the Company’s Code of Conduct. The Company also promotes and supports the development of knowledge and understanding of this Code among its personnel. In addition, the Company requires all levels of management to take responsibility and treat it as a priority to encourage and ensure that their subordinates understand and strictly follow the Code of Conduct. The Company does not allow any action that violates the law or contradicts the Code of Conduct. Any employee who breaches the principles or practices outlined in this Code will face strict disciplinary action. If the Company reasonably believes that the misconduct involves a violation of laws, regulations, or government rules, the Company will refer the matter to the relevant authorities. If the Company personnel witness any act that violates the law, the principles of corporate governance, or the Company’s Code of Conduct, they must file a complaint or report the misconduct through the Company’s established whistleblowing channels. The Company will investigate the matter without disclosing the whistleblower’s identity in order to protect them from any potential negative consequences. (Please refer to the Whistleblowing Policy and Procedures for full details.)



# Living the Code

- ✓ Study and fully understand the detailed contents of the Code of Conduct.
- ✓ Regularly and continually review as well as update your understanding of detailed contents of the Code of Conduct.
- ✓ Study and learn about the detailed duties and responsibilities required of you, together with the applicable laws, the relevant Company's policies, regulations and associated guidelines.
- ✓ Educate, inform and share this understanding with others, in the event of having to undertake any activities that may relate to the Company's business or that may have an impact on the Company.
- ✓ If you have any associated queries or questions, please seek advice from your immediate supervisor or any person designated by the Company to be responsible for monitoring compliance with the Code of Conduct.
- ✓ Fully cooperate with the parties or those persons assigned to undertake any subsequent investigation of the facts.
- ✓ Supervisors at every level must act as "leaders" in fully complying with the Code of Conduct, as well as promote a working environment or ambiance to encourage all involved personnel to fully understand that the required regulations and associated behavior in accordance with the Code of Conduct are fully correct and to be complied with.

“

Living  
the Code

”





# Measures on “Whistle-Blowing” and in Submitting Complaints

The Company has put in place complaint-making and whistle-blowing communication channels, covering complaint filing, verification, and summary of findings, together with protection of the informants or complainants and any related parties. The purpose is to handle complaints, comments, or suggestions from stakeholders affected or potentially affected by the Company’s business conduct or by the conduct of the Company personnel, resulting from law-breaking or violation of the Code of Conduct as well as any alleged acts of corruption. The scope of complaints and whistleblowing includes any breaches of or non-compliance with applicable laws, official regulations, the Principles of Corporate Governance, the Company's Code of Conduct, and internal rules and regulations. It also covers alleged acts of corruption, particularly those aimed at unlawful personal gain or benefiting others, such as fraud or embezzlement.

Should any person come across any such situations or wrongful acts by others and relevant information; they can submit complaints through the available channel of communications for “whistle blowing”. As such, the informants can choose whether or not to disclose their identity if they believe that, by doing so, they might be in danger. However, if they choose to disclose their identity the Company will be able to more effectively undertake the investigation and also to report back to the informant about any true facts or the true situation. Upon receiving the complaint/information, the Company will proceed as deemed appropriate or forward the report to the responsible person or involved party, through taking into consideration the independence in pursuing the incident based on the facts, issues or complaint received. This is in order to complete the investigation process in a comprehensive, correct and equitable manner for all involved parties with full transparency, as well as to be able to monitor any associated progress so as to be sure that the complaint has been dealt with in an appropriate and fully effective manner.

## Complaint-Making and Whistle Blowing Channels of Communication



Chairman of the Board/ Chairman of the Audit Committee/ Group Chief Executive Officer/ Head of the Internal Audit Department:  
**CP Aextra Public Company Limited**  
1468 Phatthanakan Road, Phatthanakan Sub District, Suan Luang District Bangkok 10250



**Tel: 0 2067 9300**  
(Monday to Friday, 8:00 AM – 12:00 PM and 1:00 PM – 5:00 PM)  
Toll-free number: 1800 019 099 (Daily, 8:00 AM – 7:00 PM)



**cgooffice@cpaxtra.co.th**



**0 2067 9119**



## Protection of Complainants, Whistle-Blowers, and Related Parties

**Complainants or whistle-blowers are to be suitably and fairly protected by the Company,** which implies no change in job titles, job nature, workplace, job relief, threats, job harassment, dismissal, or unfair acts. The Company will keep their complaints confidential and not disclose them to unrelated parties unless required to do so by law.

Those parties who receive the relevant report or complaint and confidential information are required to maintain total confidentiality of the incident as well as to not disclose any such facts to others unless specifically required to do so by law. If any relevant information is intentionally disclosed/ leaked to others, then the Company will take full disciplinary action in accordance with the Company's rules and regulations, as well as take further legal proceedings as applicable and required.

### **Improperly or Falsely Reporting or Information with the Intent of Causing Damage to Others.**

If the reported information is proved to be false due to deliberate distortion or false accusations, those reporting it have violated the Company's Code of Conduct, for which punishment is to be in accordance with the Company's regulations or the law, or both.

# Part 2

## Code of Conduct Practice Guidelines



# Compliance with the Code of Conduct



## Personal Behavior



Learn and carry out the assigned duties in accordance with all applicable laws relating to the conduct of the Company's business, together with the stated objectives, rules and regulations of the Company, the Corporate Governance and Code of Conduct, and all resolutions of the Shareholders Meetings.



Study and acquire new knowledge and experiences, so as to improve yourself through possessing increased knowledge and abilities in undertaking your work responsibilities more effectively, efficiently and productively.



Adhere to Code of Conduct; and not seek any position, praise and benefits from your immediate supervisor/ superior or anyone else through any improper manner or unlawful means.



Refrain from undertaking any sinful acts as well as from using any drugs or other illegal substances; and not behave in any improper manner that may harm your own reputation and dignity as well as those of the Company – such as, incurring unmanageable debts, gambling, or being involved in the use of any drugs and other illegal substances.



Not to take on any other jobs or professional activities, that will interfere with carrying out your work responsibilities within the Company or that will cause damage to your own reputation and that of the Company.



Avoid incurring any financial obligations or commitments with those persons, who are involved in doing business with the Company, or with work colleagues within the Company. This means and includes lending or borrowing any money, or seeking any monetary contributions – such as, undertaking a “share scheme” - with the exception of seeking donations for any public cause or charity.



Not to seek out any benefits or gains that are improper or unlawful – either directly or indirectly.



Not to undertake any activities that are considered to be managing or controlling any other businesses, which would result in reducing the targeted benefits of the Company; as well as not to facilitate other persons or juristic persons to gain any benefits either for your own personal gains or those of other parties.



Foster and maintain unity and collaboration within the team.



Report any suspected misconduct, fraud, unethical behavior, legal violations, or breaches of company policies or the Code of Conduct through the company's designated whistleblowing and complaint channels.

# Compliance with the Code of Conduct



## Treatment of Work Colleagues



Foster teamwork by giving cooperation and mutual help for the good of the Company as a whole.



Treat colleagues politely, courteously, and affectionately; adjust oneself for work with others; and refrain from concealing information essential to the performance of your colleagues.



All supervisors should behave so as to gain respect from their subordinates, as well as to be positive role models for them or for other work colleagues.



All subordinates should behave towards their immediate supervisors with respect.



All subordinates should listen to all recommendations or suggestions received from their immediate supervisor/superior; and should not intentionally, without consent, interfere with or undertake any work responsibilities that belong to your supervisors/superiors – unless specifically requested to do so by the superior official at the next level above your supervisors. Further, respect and politeness should always be shown to all work colleagues at every level.



Avoid disclosing any work-related and personal information of others; or avoid being critical of others so as to cause damage to such persons as well as to the overall positive image of the Company.



Refrain from any immoral conduct, sexual harassment, or violations of personal rights and freedoms, whether directly or indirectly, against other personnel. Such behavior includes causing nuisance or creating a hostile, discouraging, or aggressive work environment, as well as unreasonable disruptions to others' work. This also includes sexual misconduct or advances, whether verbal or physical.

# Compliance with the Code of Conduct



## Treatment of the Company

-  Perform your duties with utmost responsibility, integrity and dedication; while observing the Company's rules and Corporate Governance and Code of Conduct Manual, values and good traditions, primarily for the good of the Company.
-  Perform your duties in accordance with established workplace health & safety and working environment policies.
-  Strictly maintain the confidentiality of information about customers and business partners as well as those of the Company, through taking care that any associated documents or news relating to any customers, business partners and the Company are not leaked or unintentionally disclosed to those not specifically involved so as to cause damage for the Company.
-  Not to falsely accuse others or to undertake any actions that will create disunity as well as cause damage within the Company or for those persons who are involved with the Company.
-  You should maintain your own reputation and dignity, so that you are well-accepted within the Company; as well as you should not act in any way so as to cause any damage to the overall image and reputation of the Company.
-  Create positive external relationships, through collaborating in any activities relating to society as a whole and the local community, as well as through cooperating with Government agencies or other involved official organizations in providing any required information.
-  Refrain from giving and/or receiving any gifts as well as any acts of hospitality or any other types of benefits from/ to business partners or any parties who are involved with the Company's business activities unless it is for the sake of conducting the Company's business in an equitable manner, or related to normally accepted tradition or custom; whereby the value of the gift or benefit is considered to be appropriate based on the judgment of the recipient. In the event that the gift received is in the form of cash or has a total value exceeding Baht 3,000 (three thousand), then it should not be accepted and returned to the giver immediately. If it is not possible to return such a gift, then the gift (that is cannot be used up or consumed within 24 hours) should be handed over to the Company through the Corporate General Affairs Department.
-  In the event that the gift is given during a traditional festive event or for a normally accepted customary occasion and that is for consumption within 24 hours, then the recipient should inform the immediate supervisor so that the gift item can be distributed to everyone within the Department for immediate consumption.
-  Not to be involved in or to undertake any activities that may be in conflict with the overall interests of the Company together with any acts of corruption or unlawful acts of misconduct; or not fail to disclose any such activities.
-  Should not to act in a negligent manner; or should not ignore to take action whenever you come across any activities that are considered to be suspicious incidents or alleged acts of corruption. Any such unlawful acts should be informed to the immediate supervisor or those responsible or through the available channels of communication for receiving confidential information. Should also fully cooperate in investigating the true facts regarding such suspicious incidents in accordance with the formal procedures established by the Company.





# Integrity

The Company upholds integrity and honesty in every aspect of its business operations. We remain steadfast in our commitment to building trust and confidence among customers, business partners, and all stakeholders. All Company personnel must adhere to ethical principles and professional standards in their daily duties. They must strictly comply with all applicable laws and regulations and avoid any actions that compromise integrity, which could potentially harm the Company's finances or reputation.

The Company recognize the importance of fostering trust in every part of our operations. Even a single unethical act regardless of whether it is real or perceived can undermine the confidence of customers and partners. To prevent such incidents, the Company places great emphasis on promoting awareness and understanding of each individual's role in preventing misconduct. All Company personnel are expected to act responsibly and uphold ethical conduct in every aspect of our business operations.



## 1.1 Compliance with Applicable Laws, Regulations, the Company's Articles of Association, and Related Rules

### Principles

The Company gives importance to respecting as well as fully complying with all applicable laws and regulations in every location wherever it operates its businesses. Therefore, all the Company personnel must study, fully understand, respect and not breach any such laws and regulations; must act in strict accordance with all established the Company rules and regulations, instructions and announcements as required by the Company together with all legal and regulatory requirements applicable for the Company; and must respect all local customs and accepted culture of each respective operational location. The Company personnel are also required to submit any complaints, on a confidential basis, whenever they come across any alleged breach of or act of non-compliance with any applicable laws and regulations.

### Guidelines

1. The Company personnel are required to study and fully understand all local laws, customs and culture as applicable for each respective location or market where the Company operates its businesses, together with all applicable rules, regulations and established operating procedures relating to their own respective responsibilities and duties; as well as act in strict accordance with all such legal and regulatory requirements. Therefore, if any person is not sure of how to act, they should seek advice from their respective supervisor, and should not act according to their own understanding without seeking such advice
2. The Company personnel should not assist or support any actions that intend to avoid and evade as well as that are in breach of any required compliance to all established laws and regulations, operating procedures relating to the Company's business operations. If any person comes across any established regulations, operating procedures, or any announced instructions issued by the Company that are different from any applicable local laws and regulations of the respective location where the Company's business operations is located, they are required to inform any such differences to the involved department within the Company and seek advice before undertaking any actions as required.
3. If any person comes across any breach of or acts of non-compliance with any laws, rules and regulations, a report should be submitted immediately to the immediate supervisor, the involved department within the Company or through the established channels of communication under the Company's "Whistle-Blowing Program".





## Do's

- **Study and understand all relevant laws, regulations, and policies that apply to your job.**

For example, before opening a new store in another province or country, always research and understand local laws that may apply.

- **Seek advice immediately when in doubt.**

For example, if you are unsure whether bringing certain products into the store requires government approval, consult your supervisor or the Legal Department rather than making assumptions.

- **Attend all training sessions provided by the Company.**

For example, if the Company organizes training on labor laws or customer data protection, you should participate every time to stay updated and perform your duties with confidence.

- **Promptly report any misconduct.**

For example, if you witness a colleague committing accounting fraud or violating sales regulations, you must immediately report the incident to your supervisor or the responsible department through the Company's designated reporting channels.

- **Respect local cultures and traditions.**

For example, when the Company opens a new branch in a different area, you must conduct yourself appropriately by dressing respectfully and observing the local customs and etiquette.



## Don'ts

- **Act based on personal assumptions when unsure.**

For example, do not sign documents, contracts, or approve any transactions if you are uncertain and have not consulted with the Legal Department or your supervisor in advance.

- **Ignore or remain silent when witnessing misconduct.**

For example, do not look the other way if you see a colleague accepting bribes or falsifying sales reports.

- **Support or assist anyone in avoiding rules or regulations.**

For example, do not advise a business partner to avoid audits or evade taxes in order to speed up operations.

- **Skip or avoid training sessions organized by the Company.**

For example, do not refuse to attend seminars or training programs that provide updates on new laws or regulations.



### If you have questions, who should you ask?

- Your supervisor
- Corporate Governance and Compliance Department or Legal Department

### Relevant Policies

- All applicable Company policies

## 1.2 Conflicts of Interests

### Principles

Company personnel must make every effort to avoid situations that may lead to a conflict of interest, whether through holding shares, occupying a position, having financial involvement, or maintaining relationships with external parties that could influence any business decisions related to the Company. In carrying out their duties, personnel must prioritize the best interests of the Company while strictly adhering to legal and ethical standards.

### Guidelines

1. Company personnel are required not to undertake any business activities that may compete with or be of a similar nature to the Company's business.
2. Company personnel and any related individuals whether by blood or through a close personal relationship must not serve as partners, decision-making shareholders, or executives in businesses that compete with or are similar to the Company's business. In cases where such involvement is unavoidable, they must report the information through the Company's designated reporting channels and procedures.
3. New employees are required to declare the information within seven (7) working days from their start date.
4. If there are changes to the status of related individuals, Company personnel must immediately report such changes through the Company's designated reporting channels and procedures upon becoming aware of the update.
5. Company personnel must fully comply with the Company's standard operating procedures and devote their full working hours and best efforts to the Company. They must not use work hours for any external business that is unrelated to the Company's interests.
6. Avoid engaging in any activities that may create a conflict of interest with the Company, or forming any financial obligations with business-related parties or with other Company personnel.
7. All actions and decisions made by Company personnel must be free from personal interests or influence from related individuals, whether by blood or close personal connection. Transactions must be carried out at fair and appropriate market rates, as if they were with independent third parties.



## Do's

- **Clearly separate personal matters from work responsibilities.**

For example, if your relative opens a store that sells products similar to those of the Company, you should immediately notify the Company so that an appropriate course of action can be determined.

- **Promptly disclose any connection with a competing business.**

For example, if your family member or close associate invests in or holds shares in a company that competes with us, you must immediately report this through the Company's designated procedures as soon as you become aware of it.

- **Report any changes when they occur.**

For example, if your family member or relative starts a business or invests in an operation similar to the Company's, you must promptly inform the Human Resources Department or the relevant unit.

- **Use working hours fully for the Company's benefit.**

For example, you are expected to dedicate your time during working hours entirely to the Company's operations and not to personal businesses, such as running an online shop or taking freelance work during paid company time.

- **Always act with fairness and impartiality.**

For example, if you are dealing with a supplier owned by a friend or relative, you must evaluate the products and pricing objectively just as you would when dealing with any external vendor.



## Don'ts

- **Engaging in any business that may conflict with the Company's interests.**

For example, operating a store that sells the same or similar products as the Company may create a conflict with your duty to protect the Company's interests.

- **Conceal information related to personal interests.**

For example, hiding the fact that a close relative is a business partner of the Company, especially when you have decision-making authority, violates the Company's expectations of transparency.

- **Making decisions based on personal benefits.**

For example, selecting a contractor owned by a close friend without considering the best price and quality for the Company is a conflict of interest.

- **Using Company resources for personal business.**

For example, using a Company vehicle or office equipment for your own business or that of a family member is strictly prohibited.

- **Working for competitors or businesses with conflicting interests.**

For example, taking on freelance work from another company that competes with the Company creates a clear conflict of interest.



### If you have questions, who should you ask?

- Your supervisor
- Human Resources Department
- Corporate Governance and Compliance Department

### Relevant Policies

- Conflict of Interest Policy
- Anti-Corruption Policy



## 1.3 Anti-Corruption

### Principles

The Company is fully committed to adhering to the highest moral standards as well as to complying with all applicable laws and regulations in its business operations, through supporting and encouraging its staff, at all levels within the Company, to see the importance of and in being conscious about Anti-Corruption practices. The Company has also determined a system of internal controls to prevent any acts of corruption and embezzlement, together with controls on giving or receiving any forms of bribery. Therefore, the Company personnel must not undertake or condone and accept any acts of corruption in any form whatsoever, which also includes any business activities of the Company in every country it operates and within all involved business units.

### Guidelines

1. The Company personnel must not undertake and support any acts of bribery in any form as well as in regards to any activities under their responsibility. This includes the control and oversight of any contributions to charities and political parties, or the giving of any business gifts or sponsorships together with any support activities - all of which must be undertaken in a fully transparent manner and without any intent to induce any Government officials or officials in a private sector organization to act in an inappropriate or unlawful manner.
2. The Company personnel are required to avoid receiving any gifts, hospitality and any other types of benefits from suppliers, in order to facilitate full independence and impartiality in the purchase of products and goods from such suppliers. If any person is found to have received any benefits that are unreasonable and beyond any acceptable tradition or custom, or to have acted in any way that results in a lack of full independence or impartiality in undertaking their required work responsibilities, such persons will be investigated and/ or accused of having acted in a corrupt manner. As such, they would be subject to disciplinary action according to the established work regulations and other applicable the Company rules; whereby such acts also include having acted in giving or receiving or in encouraging requests for bribes or other benefits in an unlawful manner.
3. The Company personnel must not abuse or make use of their position within the Company to create undue influence relating to any business transactions of the Company, in order to acquire any direct or indirect personal gain and benefits in an inappropriate manner.
4. In the event that any acts of corruption are found within the Company, these must be reported immediately to the immediate supervisor or the involved and responsible business unit within the Company, or through the established channels of communication under the Company's "Whistle-Blower Program".



## Do's

- **Work with transparency and integrity.**  
For example, when procuring goods or hiring service providers, select based on clear criteria such as quality, price, and terms without accepting personal favors or special offers from vendors.
- **Report any signs of corruption immediately.**  
For example, if you suspect that a colleague is soliciting or accepting bribes from a business partner, you must report it right away to your supervisor or through the Company's designated reporting channels.
- **Be cautious when giving or receiving gifts.**  
For example, if a business partner offers a gift that appears unusually expensive or inappropriate, you should decline it immediately or consult your supervisor to determine whether it is acceptable before accepting.
- **Maintain clear and verifiable documentation for every transaction.**  
For example, charitable donations or sponsorships must be supported by transparent and auditable records.
- **Seek guidance when in doubt.**  
For example, if you are invited to a social event by a vendor who is currently participating in a bidding process with the Company and are unsure whether attending is appropriate, consult your supervisor or the Corporate Governance Department before accepting the invitation.



## Don'ts

- **Request or offer bribes.**  
For example, offering money or gifts to government officials in exchange for faster license approvals or other preferential treatment is strictly prohibited.
- **Accept gifts or privileges beyond customary practices.**  
For example, accepting expensive items such as smartphones, gold, or high-value gift cards from business partners or suppliers may compromise your objectivity and lead to biased decision-making.
- **Using your position for personal gain.**  
For example, leveraging your authority to select a business partner solely because they offer benefits or special privileges to you or your relatives.
- **Ignoring or concealing acts of corruption.**  
For example, if you become aware that an employee has accepted a bribe but choose not to report it due to personal considerations or fear of repercussions.
- **Supporting activities that could be used as tools for corruption.**  
For example, approving donations or support for any activity, even when you know that such support has a hidden agenda to secure government concessions.



### If you have questions, who should you ask?

- Your supervisor
- The Corporate Governance and Compliance Department
- The Security & Loss Prevention (S&LP) Department

### Relevant Policies

- Conflict of Interest Policy
- Anti-Corruption Policy

## 1.4 Giving or Accepting Gifts, Assets, or Other Benefits

### Principles

Giving or accepting gifts, assets, or other benefits, including providing and accepting any acts of hospitality, to/ from those involved with the Company's business activities are allowed within a reasonable manner during any generally accepted traditional festivities or customary occasions. However, no demands must be made for or there must be no giving and receiving of any gifts, other assets of value or any other types of benefits whatsoever that may result in undue influence in the decision making of the recipient. As such, any such actions must comply with the established guidelines relating to the giving and receiving of any gifts, or assets of value, or any other types of benefits.

### Guidelines

1. The Company personnel and/ or their family should not demand or ask for any gifts, assets of value or any other type of benefits from any construction contractors, business partners, joint venture investment partners, customers or any other involved parties in the Company's business operations, whatever the occasion, whatsoever.
2. In the event that the immediate supervisor decides that the staff member should not accept a gift, an asset of value or any type of benefits offered, the item should then be returned immediately to the giver. However, in the event that the return of the gift or item in question is not possible, it should be handed over to the immediate supervisor for handing over to the Corporate General Affairs Department and/or store HR Department (as the case may be) for consideration to be distributed for the overall benefit of the Company as a whole.
3. The Company personnel are allowed to accept a gift on behalf of the Company if it is given on a special occasion of the Company such as signing ceremony for business agreement, award winning, or receiving souvenirs from participating in charity activities. However, the value of such gifts must not exceed Baht 3,000. Afterwards, the gifts must be handed over to the Corporate General Affairs Department and/or store HR Department (as the case may be).
4. The Company personnel cannot accept any work or free services or any special discounted prices from any suppliers or construction contractors for their personal gain or benefit.
5. The Company personnel should not give any gifts to their immediate supervisor, as well as any immediate supervisor is not allowed to agree to or condone a family member to accept any gifts from those under their supervision or charge - unless it is related to a normally accepted tradition or customary event in which gifts are given; whereby such gifts must not exceed Baht 3,000 in value.
6. If it is unavoidable for the Company personnel to accept or give assets or other benefits with the value of exceeding Baht 3,000 in order to maintain friendship or relationship, whether it takes place in Thailand or overseas, or whether it is intended to be a personal gift or not, such acts must be immediately reported to the immediate supervisor.
7. The Company personnel should not give or receive, or should not promise to give or receive, any benefits or any items of value that is intended to induce or to stop any specific action to be taken, or undertake any such similar actions. This also includes not giving any bribes or related benefits of a similar nature to any officials or other fellow staff members or outside parties – especially Government officials. In giving any gifts, assets of value or other types of benefits to outside parties or Government officials, both in Thailand and overseas, it must first be verified that such acts do not breach any applicable local laws, regulations or accepted custom; whereby such gifts must not exceed Baht 3,000 in value.
8. The respective business units responsible for contacting business partners, customers, joint venture investors, or any other parties involved with the Company's business operations are required to regularly inform these parties about the Company's Code of Conduct regarding this matter.
9. Any Company personnel who intentionally violate, neglect, or fail to comply with these guidelines shall be deemed to have breached the Company's rules and regulations. Such actions may result in an investigation and disciplinary action in accordance with the Company's human resources policies and procedures.



## Do's

- **Give or receive gifts only on appropriate occasions.**

For example, it is acceptable to give a thank-you gift to a customer during the New Year, but the gift should not exceed THB 3,000 in value.

- **Notify your supervisor when receiving a gift that exceeds the specified value.**

For example, if a customer gives you a gift worth more than THB 3,000, you must report it to your supervisor immediately so the gift can be forwarded to the responsible department for appropriate handling.

- **Return inappropriate gifts immediately.**

For example, if a business partner sends a gift that appears excessively expensive or inappropriate, you should either return it immediately or forward it to the Corporate General Affairs Department for further action in line with Company procedures.

- **Explain the Company's gift policy to business partners or relevant stakeholders.**

For example, if a business partner wishes to offer you a gift, you should politely inform them that the Company's policy limits gift value to no more than THB 3,000 to ensure transparency.

- **Report to your supervisor when giving or receiving gifts to maintain business relationships.**

For example, if it becomes necessary to give a high-value gift to a customer or business partner in order to maintain the relationship, you must promptly inform your supervisor to ensure transparency and compliance.



## Don'ts

- **Solicit or request gifts from business partners or stakeholders.**

For example, asking for gifts or any special privileges from vendors, contractors, or customers even if the item is small is not acceptable.

- **Give expensive gifts to supervisors.**

For example, giving a high-value gift to your supervisor in hopes of making a favorable impression is inappropriate.

- **Accept gifts intended to influence decisions or gain favorable treatment.**

For example, receiving a gift that comes with conditions or is given with the expectation that you will take certain actions to benefit the giver in return.

- **Offer or receive bribes.**

For example, giving gifts or money to government officials or business partners in exchange for convenience or expedited approvals is illegal and violates the Code of Conduct.

- **Receive cash or cash equivalents from business partners.**

For example, accepting gift cards or vouchers that can be used as cash from vendors or business partners.



### If you have questions, who should you ask?

- Your supervisor
- Corporate Governance and Compliance Department
- Corporate General Affairs Department

### Relevant Policies

- Conflict of Interest Policy
- Anti-Corruption Policy



# 1.5 Charitable Contributions and Sponsorships

## Principles

The Company has a clear policy regarding charitable contributions and sponsorships, which must be conducted in the name of the Company, with full transparency, in accordance with Company regulations, and in compliance with the law. This ensures that donated or sponsored funds are used for public benefit or for their intended purpose, and are not misused for any dishonest or improper activities.

## Guidelines

1. Charitable donations made to any organization for the benefit of society must be directed to credible and trustworthy entities. All donations must be made in the name of the Company, with full transparency, in accordance with the procedures and regulations established by the Company, and in compliance with applicable laws. There must also be follow-up and verification processes to ensure that the donated funds are genuinely used for public benefit or in line with the intended purpose of the donation.
2. Sponsorships provided to any organization or activity must aim to promote the Company's business or enhance its corporate image. The Company's name or logo must be clearly displayed, and the sponsorship must be carried out transparently, in accordance with the Company's established procedures and regulations, and in full compliance with applicable laws.
3. The Company has established clear authority levels and approval hierarchies for charitable donations and sponsorships. All approvals must be properly documented, with supporting evidence retained and accounting records maintained by the Accounting Department. Additionally, the Internal Audit Department is responsible for reviewing these transactions to ensure that all donations and sponsorships are conducted honestly and transparently.



## Do's

- **Make donations clearly in the name of the Company.**

For example, when donating to schools, hospitals, or foundations, donations must be made under the Company's name only, with clear documentation to ensure transparency.

- **Donate to credible and reputable organizations.**

For example, the Company should choose to donate to well-established public organizations or foundations with verifiable records, such as the Foundation for Children with Disabilities or the Thai Red Cross Society.

- **Verify that donated funds are used according to their intended purpose.**

For example, after making a donation, the Company should follow up to ensure that the recipient organization used the funds as intended, such as by requesting a report or activity photos related to the supported initiative.

- **Support activities that enhance the Company's image.**

For example, the Company may sponsor a charity run or reforestation project and ensure that the Company's name or logo is prominently displayed to reflect its positive public image and commitment to social responsibility.

- **Maintain proper documentation and strictly follow the Company's procedures.**

For example, every donation approval must be supported by clear records for review by the Accounting Department and Internal Audit.



## Don'ts

- **Donate to or support non-transparent organizations.**

For example, approving donations to organizations that lack clear documentation, verifiable information, or have a questionable reputation may result in misuse of funds.

- **Make donations in a personal capacity.**

For example, donating Company funds under your own name or someone else's name may raise concerns about transparency and accountability.

- **Donate with the intention of receiving improper benefits.**

For example, providing donations or sponsoring activities in exchange for unfair business advantages or special privileges undermines ethical standards.

- **Approve donations or sponsorships without proper review or authorization.**

For example, approving donations independently without following the Company's required procedures and approval hierarchy violates internal control standards.



### If you have questions, who should you ask?

- Your supervisor
- Corporate Governance and Compliance Department
- Sustainability and Corporate Communications Department

### Relevant Policies

- Anti-Corruption Policy
- Conflict of Interest Policy

## 1.6 Connected or Related Party Transactions

### Principles

The Company adheres to the principles governing connected transactions in accordance with the Securities and Exchange Act, as well as the rules, notifications, orders, or regulations of the Stock Exchange of Thailand and the Securities and Exchange Commission, including all other relevant regulations. If it becomes necessary to undertake a connected transaction, the Company must prioritize its own best interests and treat the transaction as if it were conducted with an external party. Any individual with a vested interest must not participate in the approval process of such transactions.

### Guidelines

1. The Board of Directors must perform its duties in compliance with the Securities and Exchange Act, as well as the rules, regulations, notifications, and orders of the Stock Exchange of Thailand and the Securities and Exchange Commission. This includes complying with disclosure requirements for connected transactions and the acquisition or disposition of significant assets of the Company.
2. All connected transactions conducted under the notifications of the Stock Exchange of Thailand and the Securities and Exchange Commission must strictly adhere to the specified criteria, procedures, and disclosure requirements.
3. In cases where a connected transaction involving oneself is necessary, the best interests of the Company must take priority, and the transaction must be conducted on an arm's length basis as if dealing with an external party. All Company personnel involved or with a vested interest in such a transaction must not participate in the approval process.



## Do's

- **Disclose information clearly when engaging in a connected transaction.**

For example, if the Company plans to purchase goods from a company in which a director has an interest, you must immediately inform the responsible department to ensure disclosure to the Stock Exchange in accordance with regulations.

- **Strictly follow Company procedures and applicable laws.**

For example, if the Company is buying or selling land or assets with a related party, the transaction must fully comply with the procedures specified by the Stock Exchange and the SEC.

- **Prioritize the Company's best interests at all times.**

For example, if you have a connection to a partner company, you must ensure that the Company receives the best possible price or terms, just as it would from any independent supplier.

- **Ensure that interested parties do not participate in decision-making.**

For example, if a meeting involves approving a transaction connected to you or a relative, you must disclose the conflict and abstain from the decision-making process.

- **Clearly validate the appropriateness and benchmark pricing.**

For example, in every connected transaction, the Company should compare market prices or seek third-party references to ensure it receives the most beneficial terms.



## Don'ts

- **Conceal or avoid reporting connected transactions.**

For example, failing to disclose the facts when you are aware that a transaction, such as purchasing goods from your relative's company, is a connected transaction and not reporting it through the proper Company channels.

- **Participate in decision-making involving your own interests.**

For example, volunteering to join a key decision-making meeting to select a vendor in which you hold shares.

- **Neglect compliance with Stock Exchange regulations and the law.**

For example, intentionally failing to notify the Stock Exchange or disclose information to shareholders when the Company acquires assets from a director.

- **Execute connected transactions without proper review or approval.**

For example, approving the rental of office space owned by a relative or close friend without following the Company's required approval process.



### If you have questions, who should you ask?

- Corporate Secretary Department
- Corporate Governance and Compliance Department

### Relevant Policies

- Corporate Governance Policy



# 1.7 Fair Business Competition

## Principle

The Company is committed to promoting free, fair, and open business competition to maximize benefits for consumers and the overall economy. Therefore, the Company complies with all applicable competition laws in every business it operates.

## Guidelines

1. Notify any trade or industry associations in which the Company is a member of the Company's stance in support of fair business competition.
2. Refrain from making any agreements with competitors or business partners that violate competition laws, such as:
  - Agreements between competitors to fix prices, manipulate pricing, increase prices, or control profit margins
  - Agreements between competitors to divide customers, products, or market territories
  - Agreements between competitors to reduce production or limit supply
  - Collusive bidding or bid rigging
3. Avoid all contact with competitors during active bidding processes, regardless of whether there is a personal relationship involved.
4. Consult the Legal Department whenever there is uncertainty about whether any action may constitute a violation of competition law.



## Do's

- **Compete based on quality and service.**

For example, when competing with other companies, focus on improving products and services rather than undermining or obstructing competitors.

- **Clearly communicate the Company's support for fair competition to trade associations.**

For example, when attending meetings with trade or industry associations, state clearly that the Company does not engage in illegal practices such as price fixing or market allocation.

- **Consult the Legal Department when in doubt about any conduct.**

For example, if you are uncertain whether a pricing agreement with a business partner may violate the law, consult the Legal Department immediately.

- **Maintain appropriate distance from competitors during bidding periods.**

For example, if you are participating in a competitive bidding process, avoid any personal meetings or discussions about the bid with competitors to prevent misunderstandings or potential violations of competition law.

- **Participate in training to better understand fair competition.**

For example, attend Company-provided training sessions regularly to stay informed about business competition regulations.



## Don'ts

- **Agree on prices with competitors.**

For example, making agreements with competing companies to raise or lower the price of goods or services may violate competition law.

- **Divide markets or customers with competitors.**

For example, entering into an agreement with competitors to allocate sales territories, such as agreeing that each company will only sell in specific provinces, is prohibited.

- **Collaborate with competitors to limit production.**

For example, agreeing with competitors to reduce output in order to drive up prices or create scarcity in the market may harm consumers and breach competition law.

- **Engage in bid rigging.**

For example, agreeing with competitors on who will win a bid or splitting contracts among bidders is illegal.

- **Exchange sensitive business information with competitors.**

For example, sharing detailed cost structures or marketing plans with a competitor may be viewed as collusion and an unfair competitive practice.



### If you have questions, who should you ask?

- Your supervisor
- Corporate Governance and Compliance Department

### Relevant Policies

- Guidelines on Fair Trade Practices and Treatment of Business Partners under Fair Trade Competition

## 1.8 Maintaining Transparency

### Principle

The Company is committed to conducting its business with honesty, integrity, and strong moral principles. Maintaining the accuracy and completeness of information is essential to ensuring the Company's operations are efficient and transparent. It is the duty and responsibility of all Company personnel, at every level, to safeguard the accuracy and integrity of both financial and business-related information.

### Guidelines

1. Do not conceal, falsify, or alter any information, including withholding evidence that may result in inaccuracies in the Company's business, financial, or other related data.
2. Company personnel must provide factual and accurate information about the Company and must not defame or distort the truth. If uncertain whether certain information may be disclosed to external parties, consult your supervisor first.
3. Notify your supervisor or the relevant department if you discover any inaccurate or misleading Company-related information in any of the Company's communication channels or formats.
4. Employees authorized to act on behalf of the Company in signing documents must not submit or approve incomplete documents and must not sign blank documents or contracts that are missing essential information.
5. If you witness any actions that may compromise transparency or violate principles of integrity, report them immediately to your supervisor or the relevant department.



## Do's

- **Always report accurate and complete information.**

For example, when preparing sales or financial reports, you must enter factual data and avoid altering figures to make the report look better.

- **Immediately report any errors or inaccuracies.**

For example, if you notice incorrect numbers in a financial report, you must inform your supervisor or the responsible department right away so the issue can be corrected promptly.

- **Consult the responsible party when unsure about disclosing information.**

For example, if you are uncertain whether specific information can be shared with a customer or business partner, you should always consult your supervisor first.

- **Review documents for completeness before signing.**

For example, before signing any document or contract, ensure that all information is correct and complete to prevent any unauthorized additions afterward.

- **Inform your supervisor or the relevant department when you observe suspicious activity.**

For example, if you see a colleague improperly altering data on a receipt, you should report it to your supervisor immediately.



## Don'ts

- **Hide or change important information.**

For example, changing sales numbers in a report to meet targets, or hiding information that the Company must report to shareholders or the stock exchange.

- **Give false or misleading information that could harm the Company.**

For example, providing untrue or twisted facts to outside parties such as customers, business partners, or government officials.

- **Sign documents that are blank or incomplete.**

For example, signing a contract or form that doesn't have all the necessary details, which could later be filled in incorrectly or misused.

- **Ignore dishonest or unclear actions.**

For example, staying silent when you see a colleague or manager changing income or expense figures in a way that doesn't reflect the truth.

- **Share confidential information without approval.**

For example, giving out business information like customer data, company earnings, or business plans without permission to share it outside the Company.



### If you have questions, who should you ask?

- Your supervisor
- Corporate Governance and Compliance Department

### Relevant Policies

- Anti-Corruption Policy
- Conflict of Interest Policy





# 2 Quality

**The Company places great importance on the quality and safety of the products and services it provides.** We are committed to building trust among customers, business partners, and all stakeholders by delivering products and services that meet established standards. Our commitment to quality extends beyond internal controls and includes the entire supply chain, from raw material selection, storage, and transportation to distribution. The Company also emphasizes traceability to ensure that every product can be tracked back to its origin and through every stage of the production process.



## 2.1 Delivering quality products and services

### Principle

The Company conducts its business with a strong sense of social responsibility by delivering high-quality products and services that meet international standards, ensure consumer safety, and comply with the laws of each country where we operate. We aim to create valuable and meaningful customer experiences and achieve the highest level of customer satisfaction.



**Quality** refers to **products and services that meet international standards, are safe, fresh, and hygienic, and are supported** by an outstanding product management system, from the source of production to the hands of the final consumer. This is complemented by courteous, sincere, and prompt customer service, aimed at consistently meeting customer needs and delivering the best possible experience. All of this is carried out in strict compliance with applicable laws to build long-term trust and ensure sustainable business success.

### Guidelines

1. Select and procure products from manufacturers or business partners who operate under production standards that align with legal requirements. Follow a strict evaluation and quality inspection process in line with the Company's policies and sustainability framework to ensure that the products sold are safe, meet defined quality standards, and appropriately meet customer needs.
2. Store, handle, and distribute products using excellent product management standards. Focus on maintaining product quality and controlling safety throughout the logistics process to ensure customers consistently receive the best products.
3. Immediately report any product or service quality issues, or risks of failing to meet standards that could affect consumer safety or the Company's credibility. The Company will then take timely corrective action or initiate product recalls in accordance with applicable laws or higher internal standards.
4. Operate a structured and transparent system for receiving customer complaints. Record, track, and analyze customer feedback continuously to improve product and service quality to the highest possible standards.
5. Provide accurate, up-to-date information to customers and consumers through clear communication channels. This helps customers fully understand the quality of the Company's products and services, supports long-term trust, and ensures a safe, satisfying experience at all times.
6. Monitor and study market trends, changes in consumer behavior, and international standards related to products and services. Use this insight to continuously improve and modernize work processes in a way that aligns with local contexts and evolving consumer needs effectively.



## Do's

- **Choose products that meet quality and safety standards.**  
For example, before placing an order, make sure the supplier holds valid licenses or certifications such as GMP, FDA, or other recognitions from trusted organizations.
- **Handle and store products properly during transportation and storage.**  
For example, keep perishable items like fresh food at the correct temperature throughout transport and storage to maintain freshness and quality for customers.
- **Report any issues immediately if a product appears damaged or unsafe.**  
For example, if you notice leaks, mold, or approaching expiry dates, report them to your supervisor right away so the product can be removed from sale and inspected or recalled if needed.
- **Answer customer questions honestly and with accurate information.**  
For example, if a customer asks what a product is made of or whether it contains allergens, provide accurate details based on the product label or manufacturer's documentation without adding or changing any information.
- **Monitor and act on customer feedback to improve quality.**  
For example, if customers frequently complain about damaged goods or late deliveries, inform the relevant team and record the feedback to help resolve the issue and prevent it in the future.
- **Stay informed about consumer trends and emerging standards.**  
For example, follow trends like health-conscious or eco-friendly products and share your findings with the purchasing team so the Company can offer products that meet changing customer needs.



## Don'ts

- **Buy low-cost products that lack quality or proper certification.**  
For example, purchasing goods from suppliers without licenses or proof of product standards can pose safety risks to consumers.
- **Leave expired or damaged products on display.**  
For example, knowingly keeping spoiled items, torn labels, or expired products on store shelves instead of removing them.
- **Ignore customer complaints.**  
For example, dismissing concerns about product quality or offering an apology without any follow-up or corrective action.
- **Give false or exaggerated information to customers.**  
For example, telling customers that a product is "100% safe" or "organic" without official certification or clear evidence.
- **Stop improving products or services.**  
For example, failing to monitor changes in consumer behavior or refusing to update product quality could cause the Company to miss long-term business opportunities.



### If you have questions, who should you ask?

- Your supervisor
- Quality Assurance Department
- Sustainability Department

### Relevant Policies

- Policies and Guidelines Relating to the Company's Sustainable Development Framework
- Food Safety Policy
- Health and Nutrition Policy



## 2.2 Sustainable Business Operations

### Principle

The Company commits to running its retail and wholesale business in line with international standards, policies and guidelines relating to the company's sustainable development framework. We focus on managing and using natural resources efficiently, reducing environmental impact in every part of our operations. We promote the use of products and materials from responsible sources and improve our procurement and distribution processes by balancing economic, social, and environmental priorities. The Company strives to ensure that all stakeholders, including shareholders, business partners, employees, and local communities, gain the full benefits of stable business growth alongside long-term environmental stewardship.

### Guidelines

1. Follow national and local laws, regulations, and standards related to human rights, labor, and the environment in all areas where the Company operates. Act in alignment with policies and guidelines relating to the company's sustainable development framework.
2. Manage resources efficiently by applying the principles of the 4Rs: Reduce, Reuse, Recycle, and Replenish when handling water, energy, and waste.
3. Work to reduce waste to the lowest possible level. Convert waste into reusable materials or identify suitable alternatives for responsible waste management.
4. Encourage business partners to operate in line with human rights, labor, and environmental standards, as well as policies and guidelines relating to the company's sustainable development framework
5. Use energy and natural resources wisely. Avoid unnecessary usage and support the use of renewable energy and technologies that help lower greenhouse gas emissions.
6. Share information about the Company's economic, social, and environmental performance with transparency. Create opportunities for communities and stakeholders to express their opinions on issues that may affect the economy, society, or the environment.
7. Promote the purchase of goods and services from domestic or local producers to help reduce business costs and strengthen local economies. Support social development projects such as education and healthcare through active participation by employees and communities.



## Do's

- **Operate the business with consideration for economic, social, and environmental impact.**  
For example, when selecting products to sell, choose those made from responsibly sourced materials, sustainably grown ingredients, or produced in certified factories that do not harm the environment.
- **Apply the 4Rs in daily work.**  
For example, reduce paper usage, reuse fabric bags, separate recyclable waste, and replenish natural resources by planting trees or installing solar panels to lower fossil fuel consumption.
- **Conserve energy and resources in daily routines.**  
For example, turn off lights, electrical appliances, and air conditioners when not in use, or set the air conditioner to an energy-efficient temperature.
- **Report wasteful or polluting practices.**  
For example, if you see wastewater being discharged directly into a drainage system, report it to the responsible department immediately.
- **Support and collaborate with business partners who operate sustainably and consider economic, social, and environmental factors.**  
For example, encourage partners to use biodegradable or reusable packaging.
- **Share environmental information transparently.**  
For example, when preparing environmental reports, collect accurate and complete data and keep it ready for review by the relevant authorities at any time.
- **Support business partners who respect human rights.**  
For example, choose partners who follow labor and environmental laws, avoid illegal child labor, forced labor, and human trafficking, and promote safety, well-being, and cultural diversity in the workplace.



## Don'ts

- **Neglect laws or standards related to economic, social, and environmental responsibilities.**  
For example, if you see uncontrolled waste discharge or hazardous chemical use and choose not to report it, you fail to take appropriate action.
- **Use resources wastefully.**  
For example, leaving lights or air conditioning on all day in unused areas or using water without trying to conserve it leads to unnecessary consumption.
- **Ignore waste and leftover materials.**  
For example, failing to separate waste prevents recycling or reusing materials that could reduce environmental impact.
- **Overlook violations by business partners regarding environmental or labor practices.**  
For example, if you ignore a partner's illegal actions such as discharging untreated wastewater, releasing air pollution, or using child or forced labor, you allow unethical practices to continue.
- **Conceal information about the Company's environmental impact.**  
For example, not reporting chemical leaks, excessive dust, or noise disturbances that affect the community shows a lack of transparency and accountability.



### If you have questions, who should you ask?

- Your supervisor
- Sustainability Department

### Relevant Policies

- Policies and Guidelines Relating to the Company's Sustainable Development Framework

## 2.3 Procurement

### Principles

Procurement is a key process that determines the cost and quality of the products and services the Company uses in its operations. To ensure the best value for the Company, the procurement process must follow fair, reasonable, transparent, and accountable procedures. It must avoid conflicts of interest and treat all suppliers equally. By promoting fair competition, the Company ensures that every procurement decision serves its best interests.

### Guidelines

1. Procure/purchase goods and services with due regard for the Company's needs as well as their value/ worth, and quality, under a process that complies with designated protocols in a strict, transparent manner and in line with one's authority. Also, provide accurate and complete information to business partners openly, while giving fair, unbiased, and non-discriminating opportunities to business partners so as to promote fair competition among them.
2. In the event that the procurement/purchasing process cannot comply with established procedures and required regulations, a formal letter of explanation must be given to inform the highest supervisor of the business unit in question (Chief Level) together with the reason why it cannot be undertaken as required under the applicable established rules and regulations.
3. A business relationship should be established with the involved business partners/ suppliers on an equal basis; whereby no demands for any improper benefits or gains should be made; as well as acting with impartiality or not being too close to any one specific party so that the party involved can exert undue influence in the purchasing decision, that will then result in a lack of full transparency, fairness and equal of treatment of all business partners/ suppliers.
4. Not to undertake any purchasing agreement with those parties who are related to the authorized purchaser – such as, parents, siblings, spouses, spouses of children; or a juristic person in which the authorized purchaser has an ownership interest.
5. Undertake the inspection of any purchased goods or services deliverables in a comprehensive and careful manner, so as to ensure that the delivered goods or services deliverables fully correspond to the required specifications as agreed in the purchasing agreement – namely: required quantity, quality and delivery date.



## Do's

- **Purchase goods and services based on the Company's actual needs and value for money.**

For example, before ordering office equipment, compare prices from multiple vendors, check product quality, and select the supplier who offers the best value under the Company's conditions.

- **Follow all procurement procedures and regulations strictly.**

For example, request quotations from the number of suppliers required by the Company's procurement policy.

- **Provide equal and unbiased information to all suppliers.**

For example, communicate bid terms or project requirements to every vendor at the same time with the same content, without favoritism or special treatment.

- **Maintain appropriate professional relationships with suppliers.**

For example, engage with suppliers respectfully and professionally, avoid becoming too close, and never accept gifts or benefits that could influence your judgment.

- **Inspect all goods thoroughly according to the contract.**

For example, check quantity and quality before signing off. If you find damaged items or discrepancies, notify the procurement team immediately.



## Don'ts

- **Choose suppliers based on personal relationships.**

For example, awarding a contract to a friend or relative's company just because of familiarity, without fairly considering other qualified suppliers.

- **Bypass procedures or regulations without clear justification.**

For example, purchasing directly from a single vendor without obtaining approvals just because they have supplied goods in the past.

- **Request or accept personal benefits from suppliers.**

For example, asking for special discounts for yourself, or accepting gifts, money, or services without informing the Company.

- **Let supplier relationships influence your decisions.**

For example, feeling obligated to reward a vendor because of past help is a red flag. Discuss it with your supervisor to maintain transparency.

- **Approve goods or services without proper inspection.**

For example, signing off on deliveries without verifying the quality or quantity can result in the Company receiving substandard goods and future losses.



### If you have questions, who should you ask?

- Your supervisor
- Procurement Department
- Corporate Governance and Compliance Department or Legal Department

### Relevant Policies

- Policies and Guidelines Relating to the Company's Sustainable Development Framework
- Conflict of Interest Policy
- Anti-Corruption Policy
- Guidelines on Fair Trade Practices and Treatment of Business Partners under Fair Trade Competition

## 2.4 Marketing Communication

### Principles

Marketing Communication is a key part in creating the corporate value and positive image of the Company toward the society. Introducing products and services to the public must be conducted in a truthful manner with complete information and without distorting information, as well as keep in mind the equitable treatment to all involved parties and stakeholders.

### Guidelines

1. All marketing communications must be based on factual information, with due regard for fairness to any related parties and all stakeholders.
2. The Company should refrain from giving information that distorts the true facts or that is incorrect and incomplete, as well as from undertaking advertising campaigns that is not truthful or which may lead to any misunderstanding.
3. The Company should refrain from advertising or giving out news to the press and media that distorts the facts, or abuses any cultural beliefs, or is against any positive moral ethics, or that includes any false accusations about business competitors either directly or indirectly.





## Do's

- **Provide accurate and honest information about products and services.**

For example, if you advertise that a product helps reduce sugar intake, back the claim with credible sources such as test results or actual nutrition labels. Avoid making exaggerated statements.

- **Review all content and visuals thoroughly before publishing.**

For example, before posting on social media or printing an advertisement, double-check that all information is accurate and does not mislead consumers.

- **Use respectful and appropriate language for the target audience.**

For example, when marketing to elderly customers, use polite, clear, and respectful language without sarcasm or condescension.

- **Treat competitors fairly.**

For example, avoid making negative comparisons or referencing other brands without factual support.

- **Promote the Company's image as a trusted and responsible organization.**

For example, focus on communication that highlights the Company's values, social responsibility, and transparency to build long-term credibility.



## Don'ts

- **Make exaggerated claims or provide incomplete information.**

For example, claiming that a product can cure illnesses without any medical evidence or official approval such as from the FDA.

- **Distort information to mislead customers.**

For example, inflating prices before discounting them to make it appear as a special promotion, even though the final price remains unchanged.

- **Use inappropriate language or imagery in advertisements.**

For example, including offensive, sarcastic, or disrespectful remarks related to race, gender, or culture, or content that violates moral standards or promotes division in society.

- **Defame or spread false information about competitors.**

For example, attacking a competitor's product by claiming it is low quality or dangerous without supporting evidence.

- **Publish unverified or unauthorized content.**

For example, posting promotions or speaking on behalf of the Company through personal social media without prior approval from the marketing team or authorized personnel.



### If you have questions, who should you ask?

- Your supervisor
- Marketing Department
- Quality Assurance Department
- Legal Department

### Relevant Policies

- Corporate Governance Policy



# People

**The Company believes that the foundation of business success** lies in its Board of Directors, management team, and employees at all levels who possess knowledge, skills, and expertise in their respective fields. These individuals also demonstrate responsibility and mutual respect. The Company places strong emphasis on building an organizational culture that respects, values, and supports the growth of all personnel equally. We promote a work environment that is transparent, fair, and inclusive, where everyone receives equal treatment and opportunity.



**These principles apply not only within the Company** but also extend to customers, business partners, and other stakeholders. This approach ensures that the Company operates ethically, acts responsibly toward society, and achieves sustainable growth.

## 3.1 Promoting respectful and fair treatment

### Principle

The Company commits to fostering a work environment based on respect, dignity, fairness, and equal treatment for all. We do not tolerate discrimination based on personal bias or factors unrelated to job performance, including race, ethnicity, nationality, gender or gender identity, sexual orientation, age, religion, disability, or any other status protected by law.

The Company does not accept any form of harassment, sexual harassment, or abuse whether verbal, physical, or through any other direct or indirect means. We encourage all personnel to take part in maintaining a safe, inclusive, and respectful workplace environment for everyone.

### Guidelines

1. Treat everyone with respect and equality. Show respect to colleagues, customers, business partners, and all stakeholders through both words and actions.
2. Be mindful of your expressions and opinions. Avoid words or behaviors that may cause misunderstanding, discomfort, or negative impact to others.
3. Help create a safe and fair working environment. Contribute to a workplace atmosphere that is free from harassment and discrimination.
4. Report any incidents or suspected behavior that may involve harassment, discrimination, or misconduct to your supervisor, the Human Resources Department, or the relevant unit immediately.
5. Avoid inappropriate behavior. Refrain from using language, actions, or sharing media that is offensive, mocking, insulting, or sexually harassing. Do not ignore or accept such behavior as normal.



## Do's

- **Greet and speak to others with respect.**  
For example, smile when meeting colleagues and use polite language such as “Excuse me,” “Thank you,” or “May I, please.”
- **Respect differing opinions.**  
For example, during a meeting, if a colleague shares a different viewpoint, listen with an open mind and respond with reason rather than emotion.
- **Help maintain a respectful work environment.**  
For example, if you see a coworker being teased in a way that might make them uncomfortable, step in to ease the situation or notify a responsible person without revealing your identity.
- **Show friendliness and fairness to everyone.**  
For example, give every employee the opportunity to show their potential, regardless of their gender, age, or background.
- **Report inappropriate behavior immediately.**  
For example, if you hear remarks that could be considered sexist or racially insensitive, report them to your supervisor or the HR department right away.



## Don'ts

- **Avoid using sarcastic, demeaning, or discriminatory language or behavior.**  
For example, joking about someone's gender, voice, or body, even if meant playfully, can unintentionally offend or hurt others.
- **Do not act in ways that make others feel unsafe or under pressure.**  
For example, using intimidating stares, inappropriate comments, or approaching someone too closely without a valid reason can create discomfort.
- **Do not share inappropriate content in the workplace.**  
For example, sending or sharing suggestive images, videos, or vulgar messages in workplace chat groups is unacceptable.
- **Do not stay silent when you witness harassment or discrimination.**  
For example, ignoring bullying or mistreatment just because it doesn't involve you contributes to an unsafe work environment.
- **Do not use your position or authority to intimidate others.**  
For example, giving orders in a threatening tone or making comments that discourage others from speaking up or expressing themselves shows abuse of power.



### If you have questions, who should you ask?

- Your supervisor
- Human Resources Department
- Sustainability Department

### Relevant Policies

- Human Rights and Labor Practices Policy



## 3.2 Upholding equal opportunity, diversity and inclusion

### Principle

The Company values and promotes equal opportunities for all employees at every level. We strictly uphold and apply fundamental human rights principles in all areas of business operations, including recruitment, personnel management, performance evaluation, employee development, promotions, disciplinary actions, compensation, and contract termination.

The Company believes that diversity among employees, including gender, gender identity, sexual orientation, race, skin color, nationality, religion, age, generation, education, mindset, abilities, work styles, and disabilities, contributes to a creative, resilient, and productive workplace. This diversity enhances our ability to serve the needs of diverse customers and markets. In addition, the Company fully complies with all applicable labor laws.

### Guidelines

1. All employees must treat others equally, respectfully, and courteously, without discrimination based on individual differences.
2. Stay open to different viewpoints and show respect when listening to others. Support teamwork by fostering mutual understanding and empathy.
3. Encourage all employees to participate in activities or training programs that build awareness and understanding of diversity, and promote effective collaboration within the Company.
4. Anyone responsible for hiring or personnel management must base decisions on relevant qualifications, skills, and experience necessary for the role, without bias or discrimination.
5. The Company does not tolerate behavior that causes conflict, resentment, or any form of harassment in the workplace. Everyone has a shared responsibility to maintain a positive and respectful work environment.



## Do's

- **Respect and treat all colleagues equally.**  
For example, greet coworkers politely, listen to opinions even when they differ from your own, and avoid judging anyone based on gender, age, religion, or appearance.
- **Speak carefully and respectfully.**  
For example, before making a joke, consider whether it might make someone uncomfortable. Avoid words that may offend or devalue others.
- **Help maintain a safe and friendly workplace environment.**  
For example, if you witness bullying or verbal harassment, step in to stop it or report it to a supervisor immediately.
- **Report inappropriate behavior when you see it.**  
For example, if you notice someone acting in a sexually suggestive way or making discriminatory comments at work, report it to the Human Resources Department without waiting for it to escalate.
- **Promote a culture of mutual respect.**  
For example, support activities that encourage understanding of diversity, such as Equality Day or workshops on inclusive teamwork.



## Don'ts

- **Avoid saying or doing things that belittle or insult others.**  
For example, mocking a coworker's appearance, gender, or accent, even as a joke, can be hurtful and disrespectful.
- **Share inappropriate content in the workplace.**  
For example, sending videos, messages, or memes with offensive, vulgar, or sexually suggestive content in workplace chat groups is unacceptable.
- **Ignore harassment or inappropriate behavior.**  
For example, staying silent when a coworker is bullied, spoken to inappropriately, or touched without consent allows the problem to continue.
- **Show favoritism in the workplace.**  
For example, giving opportunities only to employees you personally like while overlooking others who may be more qualified creates unfairness.
- **Defend inappropriate behavior.**  
For example, excusing a supervisor's misconduct by saying, "That's just how he is, no one's ever had a problem with it," contributes to an unsafe and unhealthy work environment.



### If you have questions, who should you ask?

- Your supervisor
- Human Resources Department
- Sustainability Department

### Relevant Policies

- Human Rights and Labor Practices Policy

## 3.3 Protecting personal information

### Principle

The Company places great importance on the privacy rights of personal data belonging to employees, customers, business partners, shareholders, and all stakeholders involved in its wholesale and retail business operations. The collection, use, disclosure, or any processing of personal data must strictly comply with applicable personal data protection laws to ensure transparency, accountability, and trust in all business activities.



**Personal data** refers to **any information that can identify an individual, whether directly or indirectly**. This includes, for example, names, addresses, phone numbers, email addresses, national identification numbers, purchasing behavior, membership information, or service usage history collected by the Company.

### Guidelines

1. Company personnel and relevant departments shall collect only the personal data that is necessary for the provision of services or the conduct of business operations, and only on a lawful legal basis.
2. Prior to or at the time of data collection, employees must inform data subjects of the purpose of use, methods of processing, and the rights available to them (e.g., through a privacy notice), unless such information has already been made known to the data subject.
3. The Company shall use or disclose personal data only for the purposes consented to by the data subject or as permitted by law, and shall not use such data for any purpose that conflicts with the intent of the data subject.
4. The Company shall implement physical and digital security measures to prevent unauthorized access, alteration, use, or disclosure of personal data, and to ensure the accuracy, completeness, and timeliness of such data at all times.
5. Company personnel are required to strictly comply with personal data protection laws as well as the Company's internal policies. Any suspected violations or concerns regarding personal data handling must be immediately reported to supervisors or the responsible department.
6. The Company respects the rights of data subjects to access, rectify, delete, or restrict the use of their personal data, and will act upon such requests within the timeframe prescribed by law.



## Do's

- **Collect only the data necessary for work or service delivery.**  
For example, when a customer registers for membership, collect only essential information such as name, phone number, email, and other membership-related details.
- **Inform data subjects of the purpose before collecting their information.**  
For example, display a privacy notice at the membership registration counter or on the website to let customers know how their data will be used.
- **Store personal data securely in both physical and digital formats.**  
For example, keep customer documents in locked cabinets and protect digital files with encryption or password access.
- **Use data only for the purposes the data subject has authorized.**  
For example, if a customer subscribes to receive newsletters, do not use their email for unrelated purposes such as sharing with third-party marketing companies without their consent.
- **Cooperate promptly with data subjects who request changes to their information.**  
For example, if a customer requests to update or delete their personal data from the system, follow the proper procedures without delay.
- **Report any data breaches immediately.**  
For example, if you discover that customer information has been leaked or accessed without permission, notify your supervisor or the responsible department right away.
- **Follow the Company's data security measures strictly.**  
Apply both physical and digital safeguards to prevent unauthorized access, changes, use, or disclosure of personal data, and ensure that information remains accurate, complete, and up to date at all times.



## Don'ts

- **Collect data without a valid reason or beyond what is necessary.**  
For example, asking for a customer's national ID number or income when it is unrelated to the service being provided is inappropriate.
- **Use customer or employee data for personal benefit.**  
For example, using a customer's phone number to contact them for personal reasons or sharing their information with outsiders is strictly prohibited.
- **Store personal data on personal devices.**  
For example, saving customer contact lists on your personal phone or storing customer files on a private USB drive without authorization puts data at risk.
- **Disclose personal information to unauthorized individuals.**  
For example, casually discussing a customer's personal details with a friend who has no role in the matter is unacceptable.
- **Ignore signs of a potential data breach.**  
For example, if you suspect that someone is using a customer's data improperly, you must report it immediately instead of pretending not to notice.
- **Use or share Company data on personal social media.**  
For example, posting photos or customer names on your personal Facebook account without approval from the responsible team violates data protection rules.



### If you have questions, who should you ask?

- Your supervisor
- Company Data Protection Officer (DPO)
- Corporate Governance and Compliance Department or Legal Department

### Relevant Policies

- Personal Data Protection Policy

## 3.4 Use of Insider Information and Securities Trading

### Principle

As a listed company on the Stock Exchange of Thailand, the Company places high importance on ensuring fairness and equal treatment for all shareholders. Company personnel must strictly comply with internal regulations regarding the use of insider information. They must not use any non-public information for personal gain or for the benefit of others, whether directly or indirectly, and regardless of whether a benefit is received.



**Insider information** refers to **non-public information that could materially affect the price or value of the Company's securities or influence an investor's decision.** Examples include mergers or acquisitions, financial results, changes in shareholding structure, capital increases, or dividend announcements.

### Guidelines

1. Company personnel who handle insider information must take care to prevent others from overhearing, intercepting, recording, or eavesdropping. They should avoid discussing such matters in public places, over communication devices, or with family members or close acquaintances in a way that could lead to unauthorized disclosure.
2. Company personnel must not use non-public insider information for the purpose of trading securities, nor should they share such information with others for trading purposes, at any time.
3. Company personnel must not give advice or express opinions regarding the trading of the Company's securities based on insider information.
4. Company personnel who are aware of or possess insider information, including their family members, must not trade the Company's securities during the 30-day period before the public release of financial statements and for 1 day after the release of such financial statements or any other material information that could affect the Company's stock price.
5. If asked to disclose information outside their responsibility, employees should politely decline to comment and refer the request to the designated department responsible for disclosing such information, ensuring consistency and accuracy in communications.
6. Directors, executives, and all Company personnel should avoid trading behaviors that could raise suspicion of insider trading or violations of securities laws. This includes, for example, unusual large-volume transactions before major announcements, short-term trading aimed at profiting from stock price volatility, and engaging in complex derivative transactions intended to conceal insider activity.
7. The Company requires directors and executives, as defined by the Securities and Exchange Commission (SEC), to comply with the legal requirements for reporting holdings and changes in holdings of the Company's securities in accordance with the Securities and Exchange Act and SEC regulations, as well as the Company's corporate governance policy.





## Do's

- **Keep insider information strictly confidential.**

For example, if you learn the Company's quarterly earnings before the official announcement, do not discuss or share this information with anyone including family members.

- **Avoid discussing sensitive information in public spaces.**

For example, refrain from talking about merger plans over the phone or in conversations while in a café or elevator.

- **Politely decline to disclose unpublished information.**

For example, if an investor or employee from another department asks about the upcoming quarterly profits, respond with: "You'll need to wait for the Company's official announcement."

- **Respect blackout periods for trading.**

For example, do not trade the Company's shares during the 30 days before financial statements are announced and 1 day after, to avoid suspicion.

- **Report changes in shareholding as required by law.**

If you are a director or executive, report any share trading to the SEC within the legally specified timeframe.

- **Seek advice if unsure whether certain information qualifies as insider information.**

For example, if you receive news from an executive about an upcoming business expansion and are unsure whether you can buy shares, consult the relevant department before making any decisions.



## Don'ts

- **Trade the Company's shares using undisclosed insider information.**

For example, buying shares because you already know the Company will report better-than-expected profits.

- **Avoid hinting or giving "signals" to others, even indirectly.**

For example, saying "Something big is coming soon" to a friend who invests in the stock market may be considered insider tipping.

- **Give investment advice based on insider information.**

For example, telling friends or family members to buy or sell the Company's shares based on information you received before public disclosure.

- **Sharing files or documents containing insider information with unauthorized individuals.**

For example, sending unpublished earnings reports to colleagues outside your department or storing them in your personal cloud account.

- **Avoid trading in ways that appear unusual or suspicious.**

For example, buying a large volume of shares just before major announcements or making short-term trades to profit from stock price movements.

- **Use insider information to trade through someone else's account.**

For example, buying shares under the name of a relative, friend, or another person to avoid detection.



### If you have questions, who should you ask?

- Your supervisor
- Company Secretary
- Corporate Governance and Compliance Department or Legal Department

### Relevant Policies

- Corporate Governance Policy
- Conflict of Interest Policy
- Anti-Corruption Policy

## 3.5 Ensuring a safe and healthy workplace

### Principle

The Company places the highest priority on creating and maintaining a safe and hygienic working environment for its employees, business partners, customers, visitors, and surrounding communities. The Company recognizes that safety, occupational health, and workplace conditions play a critical role in business success. All related parties and employees at every level must take responsibility and strictly follow this principle together.

### Guidelines

1. Company personnel must keep their work areas clean, safe, and hygienic at all times.
2. Company personnel must strictly comply with all applicable laws, regulations, rules, and standards related to safety, occupational health, and the working environment, as well as the Company's sustainability-related policies and practices, to continuously promote and improve workplace safety management systems.
3. The Company provides ongoing and adequate training to develop employees' knowledge and skills in occupational health and safety, ensuring they can work safely in accordance with established standards.
4. The Company supplies personal protective equipment (PPE) appropriate to the risk level of each task, and employees must wear the required PPE in accordance with job-specific requirements.
5. Company personnel must immediately report any hazardous incidents, unsafe conditions, or behaviors that may lead to accidents to their supervisors or the responsible department.
6. The Company does not tolerate and strictly prohibits any acts of violence, threats, or behaviors that may jeopardize the safety of individuals or property. Possessing, concealing, or using weapons of any kind on Company premises is strictly forbidden.
7. Company personnel must not work while under the influence of alcohol, illegal drugs, or any intoxicating substances, in order to protect their own safety and that of others.



## Do's

- **Keep your work area clean and safe at all times.**  
For example, wipe the floor immediately if there is a spill, and report tangled electrical cords to the responsible department.
- **Follow all safety rules without exception.**  
For example, wear a safety helmet, gloves, or closed-toe shoes when working in high-risk areas, and comply with all safety signs in the workplace.
- **Join all company-organized safety training sessions regularly.**  
For example, attend fire drills, PPE usage workshops, or basic first aid training.
- **Wear the proper personal protective equipment (PPE) for each task.**  
For example, wear insulated jackets and gloves in cold storage areas to protect against extreme temperatures.
- **Report any irregularities or hazards immediately.**  
For example, if you notice loose wires, water leaks, abnormal machinery behavior, or coworkers working without PPE, inform your supervisor right away.
- **Help build a safe and friendly workplace.**  
For example, politely remind coworkers if you see unsafe actions, and offer constructive suggestions to improve workplace safety.



## Don'ts

- **Neglect cleanliness or leave obstacles in walkways.**  
For example, leave boxes or heavy items blocking emergency exits, which may cause accidents or hinder evacuation.
- **Ignore safety rules for the sake of speed or convenience.**  
For example, climb shelving without proper equipment or lift items that are too heavy.
- **Disregard alarms or warning signs.**  
For example, ignore warning sounds from equipment or signs indicating hazardous areas.
- **Behave violently or threaten others.**  
For example, engage in fights, intimidate colleagues, or physically harm others, whether during or outside working hours on company premises.
- **Bring weapons, dangerous items, or illegal substances into the workplace.**  
For example, carry a pocket knife, pepper spray, or enter the workplace under the influence of alcohol.
- **Work while intoxicated.**  
For example, perform duties with a hangover from heavy drinking the night before or after taking medication that affects the nervous system.



### If you have questions, who should you ask?

- Your supervisor
- The Occupational Health, Safety, and Work Environment Department

### Relevant Policies

- Occupational Health and Safety Policy and Guidelines
- Policies and Guidelines Relating to the Company's Sustainable Development Framework

## 3.6 Being Politically Impartial and Neutral

### Principles

The Company has determined a policy to be strictly politically impartial and neutral, as well as to conduct its businesses in full accordance with all applicable laws and in an honest, strait forward manner. The Company will not make any financial contributions or give support to any particular political party or will not act in any way - either directly or indirectly - that indicates any specific political alliance or affiliation. This also includes the use of the Company's assets for any politically-related activities, which may then result in the loss of the Company's total political impartiality and neutrality and/ or may cause some damage to the Company through being involved with such activities. However, the Company respects the personal rights and freedom of all its staff in exercising their respective personal political rights and preferences as a legal Thai citizen under the system of democracy.

### Guidelines

1. The Company personnel are able to freely exercise their political rights under the Thai Constitution to participate in any political activities in their own respective personal capacity, without making use of their position within the Company or the name and logo of the Company to induce or persuade others to make political contributions or to give their support to any political candidates or any particular political party.

As such, the Company personnel should be careful not to undertake any such activities that may be misunderstood that the Company is giving its support to or has a political alliance and affiliation with a particular political party. It should also not interfere with their official working hours in the Company or not to cause any conflicts of interest.

2. The Company gives importance to being politically impartial and neutral, not supporting or being involved and not having any specific alliance or affiliation with any particular political party or any person possessing political power.
3. The Company does not have a policy to give any of its capital or assets in order to assist and support any particular political party or specific politician- whether directly or indirectly - for the benefit of any such particular political party or specific politician.
4. The Company does not participate in any political campaigns or in any advertising activities within its premises to promote any particular political party or specific politician; as well as does not make use of any of its resources and assets for such political purposes.



## Do's

- **Exercise your political rights as a private citizen.**

For example, you may vote or participate in political activities during your personal time, as long as it is in your own name and not on behalf of the company.

- **Express political opinions without associating them with the company.**

For example, when sharing personal views online, do so under your own identity and avoid mentioning the company's name in your profile or posts to prevent misunderstanding.

- **Make sure political activities do not interfere with your work.**

For example, do not bring political opinions or activities into the workplace, as they may create conflict or affect colleagues.

- **Respect differing political views.**

For example, if a colleague supports a political party different from yours, listen respectfully without mocking or belittling their opinions.

- **Notify your supervisor if you see anyone using the company's name or resources for political activities.**

For example, if someone uses the company name in campaign flyers or company vehicles at political rallies, report it to the relevant department immediately.



## Don'ts

- **Use of the company's name, title, or logo for political support.**

For example, posting political opinions on social media while referencing the company's name, or wearing the company uniform to attend a campaign rally.

- **Persuade colleagues to support a political party.**

For example, asking coworkers to donate money or join political events during work hours or within the workplace.

- **Use company resources for political purposes.**

For example, using company computers, office supplies, or meeting rooms to prepare political campaign materials.

- **Distribute political materials or advertisements at the workplace.**

For example, placing flyers, campaign posters, or playing political videos within company premises.

- **Post or express opinions in a way that suggests the company supports a political position.**

For example, publicly endorsing a political party while referring to the company, or posting in a manner that creates the impression that the statement represents the company's views.



### If you have questions, who should you ask?

- Your supervisor
- Corporate Governance and Compliance Department
- Human Resources Department

### Relevant Policies

- Anti-Corruption Policy
- Conflict of Interest Policy





# Assets

**The company's assets, whether tangible assets** such as buildings, inventory, and financial resources, or **intangible assets** such as customer data, intellectual property, and corporate reputation, **form the foundation of its business strength and sustainability.**

The use and management of these assets must be carried out with responsibility, transparency, and adherence to ethical principles. Even a single instance of carelessness or misconduct can harm the company's image and long-established trust. Therefore, all company personnel share the responsibility to safeguard and utilize company assets appropriately to maximize benefits for the company and all stakeholders.



## 4.1 Application of Information and Communications Technology (ICT)

### Principles

The Company has established its Information and Communications Technology (ICT) system for use in the conduct of the Company's businesses; whereby the Company personnel are required to use this ICT system in a proper and effective manner as well as within the applicable laws and specified regulations and associated instructions. They are also required to make use of the Company's ICT system as specified for the maximum benefit of the Company, and to be careful in not causing any negative effects for the Company and any involved stakeholders.

### Guidelines

1. The Company personnel are not allowed to copy any software programs for which the associated Intellectual Property Rights belong to others; and are strictly forbidden to install or use any illegal or non-copyright computer software programs within the Company's offices. The installation of all software programs on any computer systems of the Company must be done only by the Company's Information Technology Department.
2. The Company personnel must keep the confidentiality of their respective personal IT system password and must not disclose it to anyone else, in order to prevent anyone from being able to access their computer. They should also not access any unfamiliar internet websites so as to avoid causing any technical problems or damages to the Company's computer systems.
3. The Company personnel must not use the computer system to damage or destroy or infringe the work of others, or to disturb other work being undertaken by others, through improperly searching for, accessing and editing the working files of others as well as creating any false information or document that may result in unlawful information hacking.



## Do's

- **Use company technology solely for work-related purposes.**  
For example, use computers, email, and the internet to send work documents, attend online meetings, or research job-related information.
- **Keep your passwords confidential.**  
For example, create strong passwords that are difficult to guess, and avoid sharing them with colleagues or writing them on sticky notes attached to your screen.
- **Contact the IT department before installing new software.**  
For example, if you need a design tool, submit a request to IT to verify and install it properly under a valid license.
- **Avoid accessing untrustworthy websites.**  
For example, do not click links in suspicious emails or browse unfamiliar websites that could contain viruses or data-stealing software.
- **Always follow company IT policies and relevant laws.**  
For example, make sure you do not violate copyright laws or company rules when sharing or downloading files.



## Don'ts

- **Install software without authorization.**  
For example, download and install programs from the internet without approval.
- **Share your passwords with others.**  
For example, tell a coworker your computer login password so they can access your workstation.
- **Use company computers to spy on or interfere with others.**  
For example, open someone else's files, read their emails without permission, or delete their data.
- **Use company technology for unrelated personal activities.**  
For example, watch movies, play games, or download large personal files on a company computer during work hours.
- **Violate computer laws.**  
For example, post or transmit false information, attack others online, or share illegal content through company systems.



### If you have questions, who should you ask?

- Your supervisor
- Technology and Data Department
- Data Protection Officer (DPO)

### Relevant Policies

- Information Security Policy



## 4.2 Anti-Money Laundering

### Principles

The Company aims to prevent and not to involve in money laundering activities in all countries that it is operating the business. The records of accounting, funds, or properties are legally prepared and maintained in order to ensure that the business operations do not involve in any acts against anti-money laundering laws.

### Guidelines

1. The Company is committed to engaging in business with credible customers and business partners that legally conduct their businesses. It exercises care in engaging in transactions with third parties or juristic persons with suspected wrongdoing.
2. The Company does not support or shall refrain from any acts of concealing the sources of money or properties related to wrongdoing, and does not engage in any transaction in which money or properties related to wrongdoing are processed, transformed, or converted into lawful properties. This includes a support on the above-mentioned wrongdoing.
3. The Company personnel will unconditionally cooperate with relevant agencies to prevent money-laundering in business ecosystem and will strictly comply with anti-money laundering laws. If there is any concern or question on this, one should consult the Legal Department or the Company's legal advisors.





## Do's

- **Carefully verify the information of customers and business partners before starting any transaction.**

For example, review company registration documents, copies of ID cards, or address details before opening an account or signing a contract.

- **Stay alert to unusual transactions.**

For example, if a customer requests to pay a large sum in cash without a clear reason, notify the relevant department for further investigation.

- **Keep complete records of all transaction steps.**

For example, maintain receipts, bank transfer slips, and email communications related to the purchase or service.

- **Immediately report any risks or suspicious circumstances to the legal team or relevant department.**

For example, if a new overseas client cannot provide verifiable business information, consult with the appropriate party before accepting payment or signing an agreement.

- **Fully cooperate with regulatory authorities.**

For example, if subject to inspection by AMLO (Anti-Money Laundering Office) or other agencies, provide information transparently and promptly according to company procedures.



## Don'ts

- **Skip customer or partner verification before transactions.**

For example, rush to open an account or approve a purchase order without sufficient background information, especially for unfamiliar clients.

- **Accept payments from individuals or accounts that do not match the contract name.**

For example, if a partner says a "friend" will transfer money without a proper power of attorney or clear explanation.

- **Help conceal the source of funds.**

For example, accept money from an unverifiable source and issue a receipt under the company's name to make the transaction appear legitimate.

- **Conduct seemingly proper transactions with hidden intentions.**

For example, issue a tax invoice in the name of someone not actually involved, or use someone else's account to receive or make payments.

- **Ignore transactions that may indicate money laundering.**

For example, overlook multiple transfers to the company's account without purchase orders or supporting documents.

- **Do business with individuals on watchlists or sanctions lists.**

For example, transact with a partner flagged in regulatory reports or official watchlists.



### If you have questions, who should you ask?

- Your supervisor
- Corporate Governance and Compliance Department or Legal Department

### Relevant Policies

- Anti-Money Laundering Policy

## 4.3 Use and Protection of Company Information and Assets

### Principle

The Company places high importance on the responsible use and protection of its information and assets in all aspects. All employees must perform their duties with integrity, honesty, and in the best interests of the Company. The use and management of the Company's assets must be proper, appropriate, and efficient. Employees must not exploit the Company's information or assets for personal gain or for the benefit of external parties without authorization. In addition, employees must safeguard the Company's confidential information against leaks or unauthorized use in order to preserve the Company's credibility and minimize the risk of potential damage.

The Company considers both tangible and intangible assets, including all types of information, as valuable and essential to the business. Employees at all levels must take responsibility for protecting and utilizing these assets and information with the highest level of care and efficiency. The Company strictly prohibits the misuse of assets or information for inappropriate purposes or personal gain. Employees must protect confidential information from disclosure or leakage to avoid damage to the Company's reputation, credibility, and interests.

### Guidelines

1. All employees must take responsibility for protecting the Company's tangible assets, such as office buildings, products, and equipment, and intangible assets, such as databases, strategic information, and software. This includes intellectual property such as trademarks, copyrights, patents, and trade secrets. Employees must ensure these assets remain secure, functional, and inaccessible to unauthorized use.
2. Employees must not use the Company's information or assets for personal benefit or for activities unrelated to the Company's business unless they receive formal written approval from an authorized person.
3. Employees must protect the Company's confidential business information, including trade strategies, financial data, business partner and customer information, employee information, product formulas, innovations, and operational processes. Employees must prevent unauthorized individuals from accessing or disclosing such information to the public.
4. The Company encourages all employees to use Company assets and information efficiently and ethically, in accordance with the law and the Company's data security standards.
5. Employees must respect others' intellectual property rights and must not use third-party intellectual property without proper authorization or legally binding agreements.
6. The Company does not permit any external parties to use its trademarks, logos, or other brand identifiers without prior authorization from the Legal Department or without a clearly defined business agreement.



## Do's

- **Use Company assets solely for business purposes.**  
For example, use Company computers, office equipment, and vehicles only for tasks related to your duties, not for personal matters.
- **Keep Company data and property secure and ready for use.**  
For example, shut down your computer when not in use, lock important documents in a secure cabinet, and avoid leaving confidential information in public areas.
- **Strictly protect confidential information.**  
For example, if you manage customer data files, store them in a password-protected system and avoid sharing them through unsecured channels.
- **Respect copyright and intellectual property rights.**  
For example, do not use images, logos, music, or software belonging to others in Company projects without proper authorization.
- **Immediately report any potential risks to your supervisor or the relevant department.**  
For example, if you discover that important documents are missing or the database may have been compromised, notify IT or your manager right away.



## Don'ts

- **Use Company property for personal purposes without permission.**  
For example, use the Company's printer, computer, or vehicle for personal errands or outside work unrelated to the Company.
- **Disclose confidential Company information to outsiders.**  
For example, talk about marketing strategies, revenue plans, or customer data in public areas or on social media.
- **Download pirated software or violate copyright laws using Company systems.**  
For example, install unauthorized programs on Company computers.
- **Use the Company's logo or trademark inappropriately.**  
For example, print the Company logo on giveaway items without approval from the responsible department, or use it in personal activities that could harm the Company's image.
- **Discard important documents improperly.**  
For example, throw away documents containing financial or customer information in the trash without destroying them (such as shredding or tearing).
- **Dispose of documents containing sensitive information without properly destroying them.**  
For example, throw away financial or customer data in a regular trash bin without shredding or using a secure document disposal method.



### If you have questions, who should you ask?

- Your supervisor
- Corporate Governance and Compliance Department
- Finance Department
- Technology and Data Department

### Relevant Policies

- Corporate Governance Policy
- Anti-Corruption Policy
- Conflict of Interest Policy

# Part 3

## Appendix

## The Company

CP Aextra Public Company Limited and its subsidiaries

## Company Personnel

Directors, executives/management group members, and all staff/employees of the Company and its subsidiaries

## Executives/Management Group

Persons who are responsible for managing affairs of the company whether by circumstance or as assigned by the Board

## Supervisors/superiors

Supervisors under the Company's organization structure and those higher-up in hierarchy, assigned or empowered to supervise given business units

## Stakeholders

Shareholders, customers, business partners, business competitors, creditors, staff/ employees, society, communities, the environment, Government agencies, and related entities

## Company Representatives

Those who are appointed or hired to operate the business on behalf of the Company, such as contractors, officers of logistics company, security guards, etc.

## Conflict of Interests

Activities in which personal needs or the needs of related parties, whether by blood relationship or otherwise, influenced decision-making, therefore jeopardizing the best interests of CP Aextra Public Company Limited and its subsidiaries

## Connected or Related Party Transactions

Connected transactions regulated by the Stock Exchange of Thailand (SET) or transactions between the Company or its affiliates and directors, the management, or connected persons specified by the Securities and Exchange laws

## Gifts (or presents)

Cash, assets, articles, or other benefits - given as a gesture of friendship, award, affection, welfare, or gratuity

## Assets or Other Benefits

- Honoraria/ Fees for speakers, lecturers, or the Company's advisers
- Discount privileges not granted to others
- Service or entertainment privileges
- Expenses paid for travel, accommodation, food, or similar items
- Tickets, vouchers, or other evidence, prepayment, or refund

## Traditions

A festival or an important day in which gifts may be exchanged; or events for offering congratulations, thanksgiving, welcoming gestures, condolences, or help extended as a social gesture

## Corruption

Any action, whether offering, promising, soliciting, demanding, giving or accepting assets or other benefits to Government officials or other persons in business dealing with the Company, whether directly or indirectly, as a motive or inducement for them to do or refrain from doing any act to acquire or keep benefits that are unsuitable to the business, except as allowed by the law, rules, regulations, local customs or traditions, or business customs

## Political Contribution

Assistance, whether in cash or in-kind, to support political activities - such as giving of objects /goods or services, advertisement in promoting or in support of political parties, purchase of tickets to attend fund-raising events, or donation to organizations closely connected to political parties





## Acknowledgement and Compliance Statement

I, Mr./Mrs./Ms. ....  
Company.....

hereby acknowledge, consent to, and agree to comply with this “**Code of Conduct.**” I understand that any action I take in violation of this **Code of Conduct** may result in disciplinary action by the Company as deemed appropriate.

Signed: .....

(.....)

Employee ID: .....

Date ..... / Month..... / Year.....



