

CODE OF CONDUCT

Moong Pattana International Public Company Limited

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Preface

According to the Corporate Governance Code for Listed Companies in 2017 announced by the Securities and Exchange Commission (“SEC”) on March 17, 2017, the Company’s Board of Director revised the Code of Conduct to be utilized by the directors, management, and all levels of employees as a clear and comprehensive guideline in performing their duties and fulfilling their responsible missions with honesty, accountability, transparency, and with ethics and virtue, by the aims in enabling the Company’s business to have sustainable growth and being accepted by all relevant parties.

The Company’s Board of Directors provided this Code of Conduct in writing, then informed and communicated to directors, management, and all employees for their acknowledgement. The term “employees” shall mean permanent employees, temporary employees, and employees working under special contracts. All employees must read this Code of Conduct thoroughly and strictly adhere to this Code of Conduct.

Additionally, the Committee has adopted this Code of Conduct as part of the “Work Regulations” of the Company coming into effect from August 10, 2017 onwards. This Code of Conduct has been reviewed and proposed to the Company’s Board of Directors meeting No. 4/2021 held on November 9, 2021, already.

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(Mr. Sumeth Lersumitkul)
Chairman of Board

Moong Pattana International Public Company Limited

Section 1 Business Operation Policy

Vision

“Striving for excellence in products and service with business ethic and integrity of business operation, fulfilling customer and investor expectation whilst achieving utmost relationship with business partners.”

Mission

1. Become an organization with outstanding profitability who earns trust from consumers, business, partners, and investors.
2. Become an organization with human resources as priority, emphasizing on skills and knowledge development including wellness and quality of life of employees.
3. Become an organization with good relationships with business partners and promoting mutual and long lasting growth.
4. Become an organization with reiteration of corporate governance, business ethics, and social responsibilities.
5. Become an organization with reputation as a professional trading company and distributor.

Values

1. We are determined to work, to keep promises, to be ready and to accept any improvement and change for the best results continuously, whether in terms of quality of products or personnel.

2. We nurture a strong relationship with our business partners for long-term growth simultaneously. We provide our business partner with qualified and skillful professionals to create or produce new things that can compete with the market. Moreover, we manage the Company by strengthening our morality and ethics in operating our business and with social responsibility.

3. We emphasize corporate culture by upholding the principle of unity and encouraging the employees at all levels to take part in the Company’s performance and activities. We believe in a unified team by focusing on practices for the achievement of our vision and aiming to create a learning organization where employees pay respect to each other. We support all personnel to gain knowledge and skills and encourage them to be eager to learn, as well as to receive the opportunity for self-development to grow together with the organization.

4. We take an interest in and adhere to customer needs as a center for carrying out the business by looking through from the outside so that we can understand and see the customer needs and be prepared to stand with our customers to develop and seek for a way to respond to such needs, resulting in growing profits due to our capability to solve the problem at its core, satisfactory to the customer needs by using creative and new methods so as to help our customer succeed in what they want with our quality and with satisfaction.

The Company will conduct the business by upholding morality, ethics, and social responsibility, as well as persevering in conducting the business in accordance with the law under the good governance principles. The Company lays down guidelines for directors, management, and employees based on the following 5 principles:

- 1) Be responsible for its own decision and performance by making any decision and perform its duties with care and prudence, based on academic accuracy, appropriateness of situation on the ground of sufficient information, upholding equitability with every stakeholder involved, and taking into account the maximum benefit of the Company. As such, every decision made, and performance conducted shall be elaborated and explainable.

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- 2) Be transparent and open by determining to carry out the business with integrity, not exploiting others, be loyal to the principles when it comes to anti-corruption in any form.
 - 3) Treat everyone in an equitable and justifiable manner by treating all the stakeholders in good faith and with equitability, not discriminated.
 - 4) Determine to create business value in a long run for the stakeholders by focusing on the creation of concepts or new products which can compete in the market. Manage the business by adhering to morality, ethics, and social responsibility.
 - 5) Promote the best practice by nurturing our employees to be aware of Effectiveness, Quality, and determination to make everything beyond expectation (Winning). Those 3 points of awareness will enhance the employees' attitude to the best level (Attitude to Succeed).

Section 2 Stakeholder Engagement Policies

2.1 Treatment and Responsibility towards Shareholder Policy

It is the Company's policy to provide fair treatment to shareholders and to perform our duties with utmost efforts to ensure the return of maximum benefits for shareholders in a continuous and sustainable manner. The Company lays down the guidelines to enhance such policy as follows:

- 2.1.1 Perform duties with honesty, transparency, equity as well as make any decision in good faith for the utmost benefit of the shareholders as a whole.
- 2.1.2 Report to the shareholders the business circumstances and future trends including positive and negative aspects constantly and fully based on facts.
- 2.1.3 Provide various communication channels and create the Company's website to enable shareholders to have access to information conveniently with simple language provided in both Thai and English.
- 2.1.4 Facilitate and encourage shareholders that are financial institutions to attend every Board of Directors' meeting.
- 2.1.5 Manage to prevent directors, management, and employees from making use of inside information prior to disclosure to the public for their own benefit or that of others.

2.2 Treatment towards Customers and Consumer Policy

- 2.2.1 Strive for developing and delivering products which have high quality and standards and satisfying customers' needs by utilizing modern and high-efficiency technology with a quality assurance system in all processes.
- 2.2.2 Provide information regarding products and services accurately. Determine to give customers the maximum benefit in terms of both quality and fair price.
- 2.2.3 Maintain the confidentiality of customers' information and not utilize the information for its own benefit or benefit of other relevant persons unlawfully.
- 2.2.4 Respond to customers' needs rapidly and timely to build the highest satisfaction for customers.
- 2.2.5 Establish a procedure for receiving problems and complaints from customers and treat customers with the best efforts to enable them to receive a quick response, including conducting the customers' satisfaction survey to be used for improving and developing products and services accordingly.
- 2.2.6 Not to pay any benefits to customers in exchange for obtaining or enticing customers in bad faith or in violation of the laws.
- 2.2.7 Communicate marketing and digital channel such as the Company's website, social media, SMS, or e-mail on the basis of respecting relevant laws and regulations and being aware of consumers' rights, establishing guidelines for marketing and digital channel communications as follows:
 1. Verify to ensure that the Company's advertisement will enable customers and citizens to perceive correct information.
 2. Provide customers with the information regarding products and services correctly, sufficiently, and up-to-date, to equip customers with useful information necessary for making their decision, and refrain from any acts that might mislead or cause customers to perceive the overstated quality of the products
 3. Place importance on the confidentiality of the Company's information and personal data by adhering to the laws and business ethics by not disclosing the information of the Company, customers, business partners, or any persons, or take advantage of such information to the extent other than those permitted.
 4. Maintain the Company's image especially in the use of social media. Employees shall always keep in mind that every communication to the public reflects the image, identity, and professionalism of the Company. Therefore, the employees shall consider the accuracy of the information and the appropriateness for the occasion, the use of proper language, as well as recognize their duty and responsibility towards the Company when conducting marketing communication via every channel.

5. Not infringe copyrights and intellectual property rights of the others
6. Label products with sufficient descriptions with responsibility.

2.3 Treatment towards Creditor Policy

- 2.3.1 Treat creditors fairly and equitably on the basis of providing reasonable returns to both parties.
- 2.3.2 Strictly comply with contractual obligations, agreements, or any conditions towards the creditors. In case of failure of performance, the Company shall inform the creditors beforehand to find out a solution together and to prevent potential damage arisen.
- 2.3.3 Not to demand, receive or give any benefit in bad faith in the course of negotiating the business with creditors.
- 2.3.4 Report indebtedness accurately, completely, and timely to creditors upon their request.

2.4 Treatment towards Business Partner Policy

Business partners means any undertakings or persons who contact the Company in a course of business such as sellers or service providers rendering products or services to the Company, corporate clients, financial institutions to which the Company make a cash deposit or borrow money, or insurance companies, etc. The Company shall uphold the following guidelines:

- 2.4.1 The Company shall treat business partners fairly and equitably, on the basis of providing reasonable returns to both parties.
- 2.4.2 The Company shall refrain from demanding, receiving, or giving any benefit in bad faith in the course of business negotiation or during business contacts with business partners.
- 2.4.3 The Company shall fulfill contractual obligations or commercial deals agreed with business partners strictly, and the Company will inform the business partners immediately when any of the conditions cannot be fulfilled.
- 2.4.4 The Company set up a procurement policy to ensure clarity and fairness, the policy of which has been approved by the Board of Directors of the Company and already reviewed to be suitable for situations.

2.5 Treatment towards Employee Policy

The Company recognizes that employees are its valuable assets and a vital contributing factor to the Company's goal. Therefore, the Company places importance on treating employees fairly by adhering to fair and equity without discrimination in respect of employee recruitment, remuneration, promotions, job rotations, as well as the development of employees' skills and potential along with the development of morality and ethics by upholding the following guidelines:

- 2.5.1 Recruit and select employees fairly without discrimination, without regard to birthplace, nationality, sex, age, skin color, religion, class status, educational places, or any other status that are not related to work performance, by defining a clear procedure and criteria of employee selection, to enable the Company to acquire qualified employees in accordance with the Company's requirements.
- 2.5.2 Provide fair remuneration suitable for knowledge, capability, responsibility, and work performance on the basis of non-discrimination, and stimulate employees' motivation through salary, special allowance or bonus.
- 2.5.3 Maintain work environment to be safe for the life of employees and their properties.
- 2.5.4 Appoint and rotate, as well as give a reward and punishment to employees in good faith based on their knowledge, capability, and appropriateness of the employees.
- 2.5.5 Place importance on employees' knowledge and skill development by providing opportunities for the employees equally and constantly, appropriate for the requirement in each level position, and ensure that employees have opportunities to attend both short-term and long-term training.
- 2.5.6 Strictly follow laws and regulations associated with employees.
- 2.5.7 Be open to receiving any opinions and suggestions from all employees fairly and equitably, including their complaints involving works, and ensure that the complaints will be seriously considered and fixed for the utmost benefits of all parties, and to encourage good relationship during works.

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- 2.5.8 Maintain and strengthen solidarity and harmony among colleagues. Cooperate and liaise with them in a manner beneficial for works and the Company.
 - 2.5.9 Establish measures to protect employees who submit any complaints on the alleged unlawful actions or non-compliance with ethics, including protecting the employees who object to unlawful action or corruption, regardless of whether it causes an opportunity loss to the Company or not, by not degrading their job position, changing their workplace, ordering the work suspended, threatening, interfering their work, or conducting any acts leading to a negative impact to the employee.

2.6 Employees' Behavior and Their Treatment towards Other Employees Policy

- 2.6.1 Instill into all employees the ethical awareness in performing their duties with honesty, good faith, and transparency, including observing the performance of duties of other employees and reporting inappropriate or unlawful manners found to superiors or the Audit Committee.
- 2.6.2 Respect the rights of other employees including the management, and not to criticize in a manner that might cause damage, as well as not to arrogate to themselves the work created by others.
- 2.6.3 Treat other employees or other people politely and fairly without discrimination, without regard to nationality, race, class status, gender, age, religion, believes social status, or illness.
- 2.6.4 Superiors shall behave in a manner that is respectful for employees, and the employees shall not behave in a manner not paying respect to the superiors.
- 2.6.5 Be disciplined and follow Company's regulations and any decent traditions, regardless of whether they are provided in writing or not.
- 2.6.6 Create and maintain an atmosphere of solidarity and harmony among colleagues.
- 2.6.7 Refrain from voicing or expressing an opinion to outsiders or mass media, or act in any manner that might have an impact on the reputation or image of the Company, or subsequently cause trouble to the Company.

2.7 Treatment towards Competitor Policy

The Company has the policy to encourage and promote free and fair trade competition. The Company does not have the policy regarding trade competition by using any means for obtaining competitors' information unlawfully and unethically or distorting any information, deceiving or any other means that are not in line with a good trade competition, as follows:

- 2.7.1 Foster growth of market or industries in which the Company is carrying out business, persisting in conducting business with integrity under a framework of laws and business ethics.
- 2.7.2 Refrain from seeking any confidential information from trade competitors' by using unlawful or improper manners.
- 2.7.3 Refrain from destroying the reputation of trade competitors by defaming them with any false statement.
- 2.7.4 Refrain from conducting any acts violating the intellectual property rights of trade competitors

2.8 Treatment towards Regulatory Agency Policy

- 2.8.1 Act and control to act in accordance with the purpose of the laws and regulations enacted by regulatory agencies.
- 2.8.2 Refrain from any acts that could assist, support or allow to be used to avoid the obedience of any relevant laws or regulations.
- 2.8.3 Cooperate with regulatory agencies and report the information of any acts in violation of relevant laws or regulations to those regulatory agencies.

2.9 Treatment towards Community and Society Policy

- 2.9.1 Be responsible and committed to maintaining the environment and local traditions of the place where the Company is located.

- 2.9.2 Support and carry out the activities that are beneficial and creative for the community and environment regularly.
- 2.9.3 Prevent accidents, injury, and illness of the employees arising from performing work that is attributable to work performance
- 2.9.4 Be responsive to the occurrence that has an impact on the environment and community promptly and effectively, by considerably cooperate with government officers and relevant agencies.

Section 3 Anti-Fraud and Anti-Corruption Policy

It is the Company's policy to have the Board of Directors, management, employees, and staff of the Company not to be involved in any form of fraud and corruption in exchange of direct or indirect benefit of themselves, their family, friends, or acquaintances, regardless of whether being a recipient, an offeror, or propose to be an offeror, whether in a monetary or non-monetary form, by acting towards the government authorities, or any private organization to which the Company conducts business or contact. In this regard, the Company shall adhere to the Anti-corruption Practices strictly.

Section 4 Financial Report, Internal Control, and Audit System Policy

- 4.1 The Company's management is accountable for conducting quarterly and yearly financial reports that are accurate, full, timely, and credible, in compliance with the Generally Accepted Accounting Principles.
- 4.2 Provide an effective internal audit and control system to ensure that the Company complies with standards and laws associated with the internal audit of internal auditors and the audit of the Audit Committee.
- 4.3 The Company's management and employees shall be aware of complying with the internal audit and control system and shall recognize the importance of audit reports and recommendations of the internal auditors to improve and develop the internal audit system to be more efficient and effective.
- 4.4 The internal auditors shall adhere to professional ethics stipulated by the Institute of Internal Auditors, including performing duties with honesty, having integrity in reporting audit results, keeping confidential other people's information, as well as utilizing knowledge, skills, and experiences as so required to perform duties.

Section 5 Policy for Company's Securities Trading, Use of Inside Information, and Maintenance of Confidential Information

The Board of Directors has adopted a preventive measure for insider trading for the Board of Directors, management, and relevant employees. In this regard, "inside information" means information related to the business operation or information that has a material effect on the change of price or value of the Company's securities, e.g. financial position, business performance, development of significant products, entering into contracts or termination of contracts, all of which are not yet disclosed to the general public.

- 5.1 Disclosure of any material information not yet disclosed to the public shall be conducted with care, accuracy, completeness and in time, by ensuring that the shareholders or investors have received information sufficiently, equitably, and with easy access via the electronic disclosure channel of the Securities Exchange of Thailand (SET Community Portal) or via the Company's website as appropriate.
- 5.2 Directors, management, and employees shall not use any inside information containing material substances for their own interest in buying or selling the Company's securities or give any inside information not yet disclosed to the Securities Exchange of Thailand (SET) to any other person not related to such information, including their family, relatives, and friends, etc.
- 5.3 Directors, management, and employees, who have learned of any inside information which may have a material effect on the change of price or value of the Company's securities, shall keep such inside information confidential and shall suspend any buying or selling of the Company's securities for the period of 1 month prior to the disclosure of the Company's financial statements or balance sheet or for the period as prescribed by the SET's announcement, including any other material information, and shall wait for at least 24 hours after such disclosure to the public before conducting a buying or selling transaction of the Company's securities.
- 5.4 Directors, management, and employees (according to Section 59 of the Securities and Exchange Act B.E. 2535 (as amended), shall report their acquisition or disposal of the Company's securities in accordance with the Chairman's direction re: Procedures for acquisition or disposal of securities for directors, management, and employees (according to Section 59 of the Securities and Exchange Act B.E. 2535 (as amended)), for the prevention of buying or selling securities by using inside information and in order to avoid any accusation as to the appropriateness of securities buying and selling of inside persons.
- 5.5 Directors and management shall report their securities holding according to Section 59 of the Securities and Exchange Act B.E. 2535 (as amended) to the Securities and Exchange Commission (SEC) and submit a copy of such report to the Company.
- 5.6 Persons, who are entitled to disclose material information not yet disclosed to the public, shall be appointed to respond to inquiries or give any piece of material information not yet disclosed to the public, or have been approved by the Chief Executive Officer or Co-Chief Executive Officer only.
- 5.7 Directors, management, and employees shall adhere to the procedures for disclosure of information and maintenance of confidentiality in accordance with the provisions specified in the Anti-Corruption Practices.

Section 6 Policy for Data Retention, Recording, Reporting and Use of Company's Properties

The Company recognizes the importance of internal data management by recording and reporting the data in accordance with the rules set forth by the Company and duly in compliance with the laws. As for the data retention, it shall be conducted in a safe environment and can be used as a reference or utilized as the Company desires.

The Company's properties shall mean tangible and intangible properties, e.g. movable properties, immovable properties, technologies, bill of materials, documents of titles, patents, copyrights, as well as confidential information of the Company which are not disclosed to the public, e.g. business plan, financial budget, human resources data, customer data, etc.

- 6.1 Employees undertake to record any data accurately, completely and promptly, by adhering to the rules set forth by the Company or as stipulated by laws, tax laws, and accounting standards.
- 6.2 Employees undertake to report any data accurately and based on facts.
- 6.3 Employees undertake to safekeep the important documents and confidential information and shall ensure safe and appropriate retention, being it internal data of the Company or data of any trading parties, e.g. customers, business partners, etc.
- 6.4 Employees undertake to retain the data within the time prescribed and in accordance with the rules set forth by the Company or subject to the provisions of law, by retaining with care and systematically to facilitate the use. Where the retention period has lapsed, the respective employees shall arrange for destruction by using means appropriate to each category of data or document.
- 6.5 Employees has duties and responsibilities in taking care of the Company's properties to prevent them from being deteriorated, lost and shall use such properties with efficiency for the best interest of the Company, and shall not use the Company's properties for their interest or others' interest, whether during working hours or not.
- 6.6 In no event shall employees disclose any information or exploit any confidential information of the Company.

Section 7 Giving or Acceptance of Gifts, Entertainment, Donation for Charity, and Funding Policy

7.1 Giving/ Acceptance of Gifts

To not accept or giving the gifts or souvenir or any other benefit from other who are involved with the Company's business, unless it is a traditional gift to maintain good relationship between individuals or business relationship. Those action will not in the discharge of their duties, in order to prevent the inducements, bribes and conflicts of interest. In this regard, the employee shall adhere to the No Gift Policy strictly.

7.2 Entertainment

In the event that to maintain the cordial business relations, traditional seasons or any other reasons. Those action will not in the discharge of their duties, in order to prevent the inducements, bribes and morality.

7.3 Donation for Charity

Donations must be for public charities or with the clear purpose of benefiting society, without any hidden agenda or receive incorrect business benefits or indirect bribery from permission of government bodies, benefit of tax or custom or any event of improper business advantage.

7.4 Funding Policy

Funding must be for clear objective, supporting brand or reputation of the Company in order to build business reliability, transparent and not a way to lead fraud and corruption.

Section 8 Conflict of Interest Policy

- 8.1 Directors, management, and employees shall refrain from committing any action regarded as a conflict of interest of the Company, whether arising from communication with the business partners of the Company or from the use of opportunity or data derived from being the director, executive, or employee, in order to exploit their privilege or to compete with the business with the Company or any other business in addition to that of the Company or the securities trading of the Company.
- 8.2 Employees shall persevere in committing rightful, just, and lawful actions - not committing in an unlawful manner or omit to commit any duty for the illegitimate interest of their own or others, or with the intention to cause harm to others.
- 8.3 Employees shall refrain from holding shares of those competing business with the Company if such holding may cause the employees to commit or omit any duties to which the employees are obliged or which may affect the duties that the employees are in charge.
- 8.4 Employees should disclose to the Company in the event the employees or their family members are holding shares in any business which may incur interest or conflict against the Company's business, whether such employees or their family member has acquired such shares before the employment or before the Company enters into such business or acquires by way of inheritance.
- 8.5 Directors and management are obliged to disclose information related to their conflict of interest or the related parties in order to allow the Company to consider the Company's transactions which may have a conflict of interest and determine the decision for the overall interest of the Company.

Section 9 Information Technology and Communication Policy

- 9.1 The Company encourages the employees to use electronic devices, electronic information, and information technologies to facilitate their working. In this regard, the employees shall not commit any action causing a disturbance in the computer system and internet of other persons, not download or distribute any software or inappropriate information via internet using the Company's network.
- 9.2 Management and employees shall use electronic devices and information technology in accordance with the Act on Commission of Offences relating to Computer B.E. 2550 (2007) as amended (if any) and the Electronic Transactions Act B.E. 2544 (2001) as amended (if any).
- 9.3 Employees shall avoid using electronic devices of the Company for any dissemination of inappropriate information against morals, traditions, ethics, and laws, or commit any action that may incur damages against the national security and safety.
- 9.4 Employees shall perform their duties by using licensed computer programs. In no circumstance shall the employees install or use any unlicensed computer programs in the office.
- 9.5 Employees shall avoid any action regarded as destruction, modification, change, or addition, whether in whole or in part that may cause damage, to the computer data or computer system.
- 9.6 Management and employees shall protect and maintain their username and password and shall not use them with others, disseminate, distribute, or make them known to others.
- 9.7 Employees shall be cautious and shall avoid any action that may be regarded as a violation of intellectual properties or copyrights, whether the intellectual properties or copyrights of the Company or others.
- 9.8 The Company may inspect the use of the computer, including any relevant equipment, data, and information technologies, without any permission of the respective user.

Section 10 Policy for Exercise of Political Rights and Political Assistance

- 10.1 The Company has the policy to support the directors, management, and employees to exercise their political rights as good citizens in accordance with the democratic regime of government with the King as Head of State.
- 10.2 The Company has a policy not to support any political activity of any specific political party. The Company is politically neutral - it shall not take the side of any party or any political group.

Section 11 Inform of Complaint, Suggestion, Advice Requested and Whistleblowing

The Company provides a channel for employee and any group of stakeholders to place queries or suggestion or file a complaint and inform any non-compliance with laws, code of conduct, fraud and corruption via the channel set in this Code of Conduct. In this regard, the whistleblower need to specify information relating those concerns as well as their name, address and telephone contact number and send to:

1. Independent Director's email: ind.director@moongpattana.com

or by post to: Chairman of Audit Committee
Moong Pattana International Public Company Limited
No. 2/97-104 18-19 Fl., Bangna Complex Office Tower,
Soi Bangna-Trad 25, Bangna-Trad Road, Bangna-nuea,
Bangna, Bangkok 10260

2. CEO's email : ceo@moongpattana.com

or by post to: CEO
Moong Pattana International Public Company Limited
No. 2/97-104 18-19 Fl., Bangna Complex Office Tower,
Soi Bangna-Trad 25, Bangna-Trad Road, Bangna-nuea,
Bangna, Bangkok 10260

3. Company Secretary's email : company.secretary@moongpattana.com

or by post to: Company Secretary
Moong Pattana International Public Company Limited
No. 2/97-104 18-19 Fl., Bangna Complex Office Tower,
Soi Bangna-Trad 25, Bangna-Trad Road, Bangna-nuea,
Bangna, Bangkok 10260

4. Mobile Phone : 080-826-3599

In case of whistleblower or complainant file a complaint to the Chief Executive Officer or the Executive Committee, the whistleblower can submit the file directly to the Chairman of the Audit Committee. The Company has practices on protection and confidentially measures of employee and whistleblower. The information will be kept with the highest confidentiality.

Section 12 Occupational Safety, Health and Environment Policy

To ensure sustainability under the business operation meet which is the strategy of the Company and in compliance with good corporate governance, the Company has awareness on health, safety and quality of life of employees. Our Company has formalized the Occupational Health and Safety standards in workplaces, along with associated guidelines, to guide these practices throughout the organization. The goal is to create a safe and healthy workplace with a modern security system as well as to provide concrete guidelines on preventing any workplace accident, injury, disability or fatality. The Company establishes Safety Vision and Safety Mission as follows:

12.1 Safety Vision:

Create proper safety and risk-free workplace environment, concentrate on employee healthcare in order to enhance both productivity and well-being for employees.

12.2 Safety Mission:

- Uplift and develop environment to be safe proper and hygienic.
- Provide knowledge, create awareness and conscious of Occupational Health and Safety standards in workplace.
- Promote employee health and well-being both physically, mentally and society.

In this regard, the Company shall adhere to the Occupational Safety, Health and Environment Policy strictly.

Section 13 Human Rights Policy

Our Company believes and aims to conduct business with ethics holding onto responsibility to society and all groups of stakeholder e.g. shareholders, customer, competitor, business partner, debtor, employee, society and environment based on Good Corporate Governance principle and our Code of Conduct. In respect of human rights protection, we have strictly complied with human rights as the most fundamental aspect of compliance is respect for basic human rights. We believe that the human rights will certainly build peaceful and harmonious community. It is to ensure that our business operations are engaged with prudence and without violating or affecting human rights, directly or indirectly and not promote or involve human right violation. We have guideline as follows:

- 13.1 No conduct, support, involvement in any violation of human rights issues including any relevant of an exploitation of child and forced labor, illegal work and sexual harassment in any forms.
- 13.2 Places great importance on equal rights of women, but not limited to vulnerable groups e.g. disable persons, pregnant women and women under breast-feeding.
- 13.3 Places great importance and respect of nationality, social status, health, education, rights to work, social classes, races and religion.
- 13.4 Deploy fair recruitment practices and impartial opportunities including for candidates with disabilities.
- 13.5 Deploy policies and standards of customer information security and internal data security control.
- 13.6 Determine to create and maintain corporate culture aiming to respect human rights according to this Human Rights Policy.
- 13.7 Provide opportunities to employees in order to complain or express their opinions on related issues on human rights by providing the whistleblowing channels with guaranteed of its confidentiality. In addition, the Company established verification process for complaints together with measures to investigate and punishment of offender in such issue.

Section 14 Intellectual Property Policy

The Company respects and abide by the laws regarding intellectual property, and has policy and guideline regarding noninfringement of the intellectual property rights as follows:

- 14.1 All employees have a duty to protect and maintain confidentiality with respect to the intellectual property of the Company to prevent data leakage and shall not use the Company intellectual property for personal or third party interest without permission.
- 14.2 All employees must respect and honor the intellectual property of others and must not infringe the intellectual property of other whether wholly or partly without the permission of the owner.

Section 15 Privacy Policy

The Company respects the privacy of our customers, shareholders, employees, and stakeholders. We uphold to continuously enhance the efficiency and values of the organization, conducting the business with governance in order to ensure that such persons' rights will be fully protected in accordance with the personal data protection laws. In this regard, the Company has established a privacy policy to implement proper rules and measures in respect of governance and management of personal data.

Personal data shall mean any information relating to an identified or identifiable person whether directly or indirectly.

- 15.1 The Company respects the privacy of our customers, shareholders, employees, and stakeholders. Thus, any personal data of the employees and stakeholders, such as status, biography, work experience, financial information, contact information, health data, or any other personal data, will be protected, not to be used, disclosed, or transferred to any other person in a manner that is considered a violation of the law.
- 15.2 Management and employees shall respect other persons' personal data. In case of any use, disclosure, or transfer of any other persons' personal data, consent of the respective person(s) shall be obtained and there shall not be any violation of rights in accordance with the laws.
- 15.3 Any person who stores the data in the possession of or in the supervision of the Company shall protect the personal data of the employees and the stakeholders. Therefore, any use, disclosure, or transfer of personal data of the employees and the stakeholders shall be committed only where necessary and in relation to the ordinary course of business, and there shall not be any violation of rights in accordance with the laws.

Section 16 Tax Policy

It is the Company's policy to conduct business with transparency and integrity on the basis of corporate governance, striving to be a growing organization with values and responsibilities in respect of tax, in order to add value to the economic and social system; upholding and adhering to the provisions of the Revenue Code and tax law relating to the business' conduct; complying with the provisions in respect of tax disclosure to the relevant government officials and organization, including public disclosure for the best interest of the shareholders. In this regard, the Company has set forth the following tax strategies to ensure that our tax management is proper and efficient:

- 16.1 Respect, uphold and comply with the applicable law, regulations, and rules.
- 16.2 Regularly monitor changes to tax measures and properly submit the tax to the government, or accurately request for tax refund within the time stipulated.
- 16.3 Take into account the risks involved with tax to ensure that there are risk indicators and management in respect of tax, in order to properly minimize the risks that may occur.
- 16.4 Efficiently utilize tax incentives in accordance with the laws, under the sustainable and suitable business' conduct, in corresponding to the principle of tax efficiency of the tax system according to the set forth objectives. Tax incentives may include tax exemption from time to time or any other benefits under the national tax policy.
- 16.5 Disclose tax information to the government authority and the public with transparency by adopting the disclosure standards and reporting standards of the financial reports and annual reports of the Company in order to build the trust of the stakeholders.

Section 17 Environmental Policy

The Company is committed to conducting the business to achieve sustainable growth based on environmental responsibility along with effective environmental management. In recognition of reducing environmental impact arising from the business operation and its products and service, the Company therefore has implemented the policies that encourage the development in value chain management, creating innovations that reduce any potential impact, setting a target for consuming natural resources with the awareness of their value, as well as encouraging same-level subsidiaries, trading partners and stakeholders to acknowledge the policies so that they can behave in the same direction, the policies of which are as follows:

- 17.1 Respect, adhere and abide by environmental laws and regulations strictly.
- 17.2 Create awareness among the management and employees in utilizing resources and energy economically, to its utmost value.
- 17.3 Conduct training, public relations and communications with the employees and other parties concerned to enable them to realize the environmental impact, and to promote employees' consciousness in environmental preservation, occupational health, safety, and satisfactory work environment continuously and thoroughly. The Company will provide support in human resources, budgets and working hours for conducting the training in this regard.
- 17.4 Set up a channel for receiving opinions, suggestions, and complaints from the employees to encourage employee engagement with respect to environmental management.
- 17.5 Promote environment and energy saving by putting the responsibility upon the management and all employees that they shall cooperate to follow the defined measures.

Section 18 Enforcement and Disciplines

- 18.1 It is the duties and responsibilities of all directors, management, and employees to study, understand and strictly adhere to the code of conduct.
- 18.2 In case of any inquiries regarding the code of conduct, employees should seek advice from their respective superior or the executive of the respective division.
- 18.3 All directors, management and employees are obliged to comply with, and encourage others to comply with, the code of conduct.
- 18.4 Any director, executive or employee, who commits any breach or non-compliance with this code of conduct, or allow its subordinate(s) to commit any breach or non-compliance with this code of conduct, may be subject to disciplinary action, which may include dismissal, compensation for damages, and civil or criminal penalties.
- 18.5 The Company shall review the code of conduct once every 2 year, so that it is suitable for the changing circumstances and business environment.