



Code of Conduct	Review date : 29 June 2022
	Approval date : 29 June 2022 (Executive Board Meeting No.3/2022)
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	Supersede date : 19 June 2020

Part 1 Message from Chairman

This code of business conduct for Executives, Directors and Employees is prepared as a guideline for executives, directors and all employees to understand the ethical standards that the company uses in its business operations as the company believes that the ethical guidelines are an important tool in enhancing the transparency of the company's operations. This will lead to confidence in investors or all relevant parties, including the better performance of executives, directors and employees.

Corporate's vision and mission

The great success of the company is due to its strength, stability, and persistence for a long time, until it expands its deep-rooted business potential by providing benefits and shaded like a large sprawling tree that has been a part of Thai society for over a century. THE GREEN BIG TREE or "Because we are a big tree" is a word that reflects the success of the organization which has the uniqueness as well as the concepts of management and employees in operating business in unity.

Corporate Values

1) Customer @ Heart

- Take care of customers and keep in mind that the customers as priority
- Aims to create an impression beyond the expectations of customers
- Provide value-added services with efficient and fast quality

2) Drive change

- Challenge with same work by better work method
- Focus on continuous learning with a heart that is committed to success
- Driven fast for good business opportunities

3) Strive for excellent

- Determined and attentive for excellent results
- Always delivering good result with professionally integrity
- Support the best quality to deliver good services that are valuable to customers



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4) Happy workplace

- Take care of employees fairly, honor and trust
- Create a friendly working environment that useful for showing the potential of employee
- Support and develop talented people to grow with the organization. Promote good cooperation and teamwork throughout the organization to achieve common goals.

Corporate Culture

(1) Winning Attitude

Desire to operate things to achieve the goal and determined to achieve the highest goal by being ready to deal with things that happen, whether good or bad, during the working process.

(2) Insights for Customers

Paying profound attention to the customer in-depth requirements and presenting products and services that suitable for each person.

(3) Nurture Relationships

Work with others, both internal and external the organization, as business partners to achieve mutual success.

(4) New Opportunity

Demonstrate business intelligence by using opportunities that occur in unpredictable situations and change it into an action plan or business strategy plan.

(5) Inclusion & Diversity

Respect and treat people fairly based on individual differences but assimilate different ideas creatively to create a sense of belonging to one team for maximum success.

(6) Non-Bureaucracy

Being rational for eliminate obstacles that hinder the speed and agility to help the organization survives in competitive environment.

(7) Transparent governance

Use the best possible process for making decisions and taking ethical with timely actions.



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Business ethics and Code of conduct

This code of business conduct establishes ethical principles which Berli Jucker Public Company Limited (Hereinafter referred to as "BJC group" or "Company"), including subsidiaries, associates, and other businesses which the company has control over, including foreign operations used the principles for business operations by demonstrating BJC's commitment to conducting business both ethically and legally to provide guidelines for people who work in the company.

BJC group's employees, subsidiary companies, and other activities that the company has control over including foreign operations are responsible for complying with this code of business conduct. Non-compliance with the code of business conduct is offences against the principles and may be subject to disciplinary action or termination of employment (In the case considered as serious offense)

This code of business conduct is a moral agreement that is agreed upon within the organization which has a framework for decision making under virtue. In addition, there are principles for the Board of Directors and all employees to treat others under the same guidelines whether the case of treating employees, stakeholders or communities, including government agencies as well.

All BJC group's executives shall have procedures to ensure that employees in your department are acknowledged of the principles in code of conduct. All BJC employees are responsible for complying with this code of conduct both literal meaning and intention. Although there may be cases in which the message may not be covered, everyone must use good judgment and exercise discretion for requesting additional guidance from the management as appropriate to apply in case of any doubt.

Scope

This code of business conduct is applicable for all executives, directors and employees of the company, subsidiaries, associates and other businesses that the company has control including foreign businesses. "Employees" means permanent employees, temporary staff, employees under a special contract, and hired employees of the company.



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Code of Conduct

1) Conflicts of Interest Policy

1.1 Board of Directors and Executives

They shall carefully consider conflicts of interest regarding connected transactions according to the regulations of the Stock Exchange of Thailand between the company and subsidiary with honesty, reasonably and independently within the framework of good ethics by consideration for the benefits of the company to ensure that the mentioned transaction is reasonable and mainly benefit to the company.

1.2 Audit Committee

They have a duty to consider the connected transaction or any transaction that may have conflict of interest to be in accordance with the law and the regulations of the Stock Exchange of Thailand to ensure that the mentioned transaction is reasonable and mainly benefit to the company.

1.3 Employees

1.3.1 Employees shall avoid any directly or indirectly action which is against the interests of the company, including dealing with business associates of the company, such as business partners, customers, competitors, or using opportunities or information obtained from employees to personal exploitation or from doing business in competition with the company.

1.3.2 Employees shall not conduct business for competition or perform anything that may affect the company's benefits as well as work for other people or any other organization whether or not they received compensation during the company's working hours except get an approval of the president or the assignee in writing.

1.3.3 Employees shall protect the interests of the company with full capacity.

2) Anti-Competitive practice and Antitrust Policy

The company supports fair competition by conducting business and operations in according to antitrust and trade competition laws. The company avoid any actions that may lead to monopolization and unfair trade practice.



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2.1 Treatment of business partners

Treat them appropriately, fairly and equally in accordance with the code of business conduct.

The company also conducts online auction or E-Bidding in order to prevent unfair competition as well.

2.2 Treatment of competitors.

The company conducts business with fair and professional manner by not acting in a dishonest way that harms competitors or anyone. Does not seek any trade secrets of competitors or competitor’s information by unlawful means.

3) Anti-Corruption and Bribery Policy

The company is committed to conducting business with honesty, transparency, fairness and comply with good corporate governance principles whether conducting business activities locally or internationally. The Group will comply with relevant laws and related regulations along with guidelines for directors, executives, staff, and employees including any persons who acting for the benefit of the company or on behalf of the company. These people shall carefully follow the anti-corruption and bribery policy as well as do not neglect or ignore when seeing actions that are considered as fraud and corruption.

The anti-corruption and bribery policy covers giving or accepting gifts, receptions, giving or receiving donations for charity funding and political support, whether directly or indirectly, which must comply with the law transparently.

4) Human rights and equality policy

The company aware of the value and dignity of humanity so the company conducts business by adhering to the respect for human rights of all stakeholders and fair labor practices comply with international human rights regulations, laws, and related agreements. The company has human rights policy which in line with relevant legal principles and the UN Guiding Principles on Business and Human Rights. The policy covers treating other people with respect and equality, honor each other, accept the value of individual differences, and does not discriminate against employees, customers, suppliers, business partners and joint ventures.



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5) Maintaining of company property and Information security & cyber security policy

- 5.1 All methods of installation, production process, production formula, ideas, price, pricing, as well as knowledge of various techniques or knowledge and/or techniques of other methods related to the company or operation due to the idea, research and/or any other actions resulting from the performance of duties and the employment contract in all cases. Those things are defined as intellectual property of the company, regardless of whether it has been registered under the intellectual property law or not, shall not be distributed without permission from the president or the assigned person in writing.
- 5.2 During the period of employment, employees will aware of company information known as "trade secrets", means trade information which has not yet widely known or not yet accessible among the persons who are related to such information. It is the information which is useful commercially as it is a secret and it is the information which a commercially trade secret controller uses appropriate measure to maintain its secrecy so this information may be stated in contract or any other agreement of the company or specified in the trade secrets act, B.E 2545 (2002). Employees agree to keep "trade secrets" of the company that have known or given because of working for the company and do not sent or copied to recipient without permission, including disclose and/or do or refrain from any action that damage to the company's reputation or the company's business. As well as not being employee give advice, consult, assist or make any promises with any corporation or the competitors or conduct business similar to the company's business during the period of employment and within 1 year from the date of termination of employment.
- 5.3 Employees shall not bring assets or internet of the company for commercial purposes or personal benefit except for directly benefit to the company.
- 5.4 Employees shall strictly adhere to comply with the company's information security policy as follows;
- Shall not intervene with the privacy of others regardless of any circumstances.
 - Shall not access company's confidential information. Employees only use the information that have been authorized.
 - Shall adhere to the rules and regulations on use of equipment and tools in computer systems.
 - Prohibiting access to data and documents of other users without permission.



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- 5.5 Employees shall acknowledge and follow the guideline for using computer and network systems correctly and appropriately.
- 5.6 Shall not install software or record any information in the company's computer without permission.
- 5.7 Shall not bring the company's software to other persons which includes suppliers, contractors, and customers of the company including install the software for personal agenda. Furthermore, the use of internet or connect to internet by employees to transferring data, dissemination of pornography, sending and receiving information via electronic mail (e-mail) that violates the law or copyright law or the intent or the purpose of the policy or regulations for information security policy of the company or Computer-related Crime Act B.E 2550 (2007) or other related laws.
- 5.8 During the period of employment, employees shall not act any and/or refrain from any actions that cause the company has been damaged as a result of false information and/or report or record or communication whether by any means, intentionally.
- 5.9 Employees shall not violate the company's copyright and/or of any other companies that allow the company to use the computer program regardless of the contract and/or any method and/or whether the action is repeated, modify, distribute to the public or rent or copy whether for profit or not. If the employee is unethical, the company has the right to terminate the employment contract immediately.
- 5.10 Employees shall use the assets of the company with care, responsibility for the equipment. Any received equipment from the company should be always in good condition by contacting repair department when damage occurs.
- 5.11 Employees shall not violate any regulations of the company that may cause accidents or Damage Company's property.
- 5.12 Employees shall keep company's property from being lost or destroyed, even if it is not their direct responsibility.
- 5.13 Employees shall not use company's property for other purposes except for working for the company.
- 5.14 All executives, directors and employees of the company shall keep confidential information about customers, contract parties, business partners, other employees or any other person.



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- 5.15 All executives, directors, and employees of the company shall not disclose confidential information, documents and trade secret even after leaving their duties.
- 5.16 All Executives and employees of the company shall acknowledge the procedure of information security and follow the guidelines to prevent confidential information from being unintentionally disclosed.
- 5.17 The Chief Executive Officer and the president will approve the information released to the public.

6) Trading security and insider trading policy

- 6.1 Committees and executives are obligated to disclose their securities information according to The Securities Exchange of Thailand (SET) and The Office of the Securities and Exchange Commission (SEC) rules and regulations.
- 6.2 The company, subsidiaries and associates of SET listed companies must comply with insider trading laws by treating all stakeholders equitably and fairly. In order to prevent personnel at all levels and their family, who may know or receive nonpublic inside information from violating the laws; thus, the company forbids those from trading or inviting others to trade the company’s stock, subsidiaries and/or associates of SET listed companies’ shares by themselves or through a broker during the time that they’re still holding nonpublic material information. The company along with SET considers that type of trading as unfair speculation or unfair advantage.
- 6.3 The company designed an internal security system to protect confidentiality of its information. In addition, the company also limits its access to nonpublic information by only permitting relevant or necessary personnel to access this confidential information; thus, it is a duty of the confidentiality owner or holder not to publicly disclose inside information, and emphasizes the strict obligation to follow security procedures to any relevant personnel. If anyone violates insider trading rules and regulations, they will face disciplinary actions and/or legal sanctions.



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7) Internal control and audit, and accounting and financial report policy

7.1 Internal control and audit policy

Establish an effective internal control and audit system; the system is under supervision of internal auditors along with audit committees.

7.2 Accounting and financial report policy

There is the responsibility and accountability of management for making accurate and timely financial report which includes annual and quarterly financial statement based on accepted standards.

7.2.1 Accuracy of recording

- All kinds of business records must be accurate, complete and can be held accountable without exemption.
- Accounting and business records must be done with honesty and without distortion.
- Personnel at all levels must conduct business transactions in accordance with the rules and regulations of the company, including attaching evidential documents that list all complete, sufficient and punctual needed information; thus a person in charge of recording, making and auditing accounting and financial report can record and make the company’s accounting report together with every type of financial statement into the company’s accounting system by having all accurate and complete details.

7.2.2 Accounting and financial report

- All employees must not commit any distortion, conceal information or make false statement whether it is accounting and financial business transaction data or operation data.
- All employees should recognize that the accuracy of accounting and financial report is responsibility of board of directors, executive and responsible staff.
- All employees are responsible for operating, preparing and/or providing business report.

7.2.3 Good guidelines of compliance with laws

- Personnel at all levels must follow national and/or international relevant laws and regulations in order to create accurate and complete accounting report and financial statement.



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- Personnel at all levels must record data based on the principle of honesty and fairness.

8) Responsibility to shareholders’ policy

- Perform duties with honesty and fairly treat all shareholders.
- Consistently and completely report organization’s status to all shareholders.
- Report to all shareholders about the future trend of organization in both positive and negative way with sufficient supporting reasons.

9) Employee treatment policy

- The company will fairly provide compensation and welfare for employees by comparing to market return of similar industries.
- Maintain working environment to be safe for employees’ life and property.
- Designation and transferring of employees including rewards and penalties shall act in good faith and based on the principle of knowledge, capability and suitability of employees.
- Support and emphasize on the importance of improving knowledge, capability and employees’ skill by providing opportunities thoroughly and consistently.
- Strictly comply with relevant labor laws and regulations.

10) Employee behavior and treatment of other employees

- Perform duties with determination, honesty and transparency.
- Refrain from giving gift to superiors or receiving gifts from subordinates.
- Respect the rights of other employees including management team.
- Superiors should behave to be respected by employees, and employees should not do any action that disrespect superiors.
- Should be disciplined and comply with the rules of the organization and good traditions whether specified in letter or not.
- Establish and maintain unity atmosphere and solidarity among employees and avoid any action that affects reputation and image of the company or causes a trouble for the company later.



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11) Social responsibility policy

- Have responsibility and commitment to maintain environment including local customs and traditions where the organization located in.
- Consistently hold social, community and environment activities in order to improve community, where the organization located in, and to have better life quality. Including, the company host activities itself and cooperate with the government and community.
- Prevent the accident and control waste releasement in order to keep waste level below the accepted standards.
- Respond proactively and efficiently to incidents that affect the environment and community which come from the company's operation by fully cooperating with government officer and relevant agencies.

12) Safety, Occupational health and working environment policy

Since the company recognizes the important of safety, occupational health and working environment of employees and visitors. The Company has set a policy on safety, occupational health and working environment which covers development of safety, occupational health and working environment management systems in accordance with laws, international standards and other relevant requirements.

Encouraging employees to recognize the important of safety working, and supervising the performance of employees and visitors or a person who works inside the company to strictly comply with safety and occupational health regulations is to ensure the maximum safety of every process of working, and is to reduce the rate of accidents and hazards, which employees may encounter while working, to minimum or zero.

In order to achieve maximize the performance and achieve the highest level of efficiency, there will be regular monitoring and evaluation of work performance according to safety, occupational health and working environment policies.

13) Whistleblowing

Any incident of a violation of the laws, rules, regulations, ethics, or relevant company policies or allowing the subordinates to have such violations. Executives, committees and employees must report directly to the Human Resources department or provided channels by the company. The company has established clear policies, procedures and measures to protect the whistleblower. When suspect or believe that there is laws,



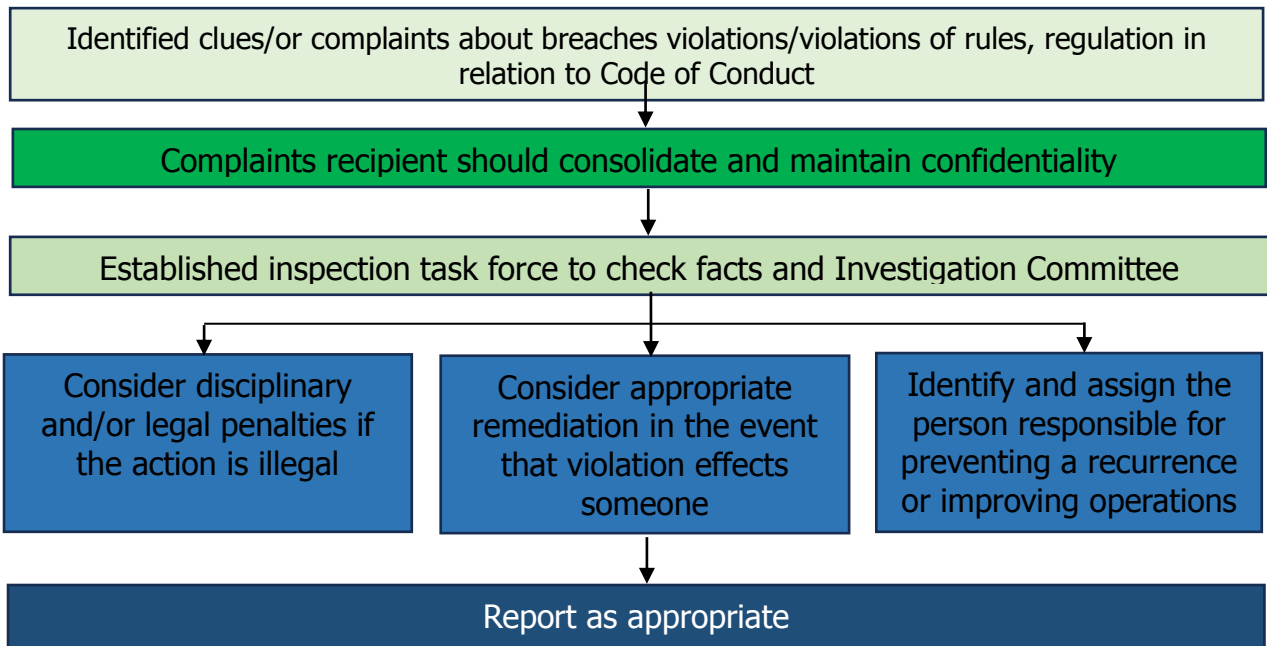
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ethics violation and rights infringement, all internal and external parties can report through this provided channels.

Board of inquiry and Human Resources department will later carry out the procedures which is specified in policies and code of conduct. BJC's corporate-wide whistle blowing system are shown as illustrated below.

14) Follow-up and improvement

The company will review the business ethics every 2 years in order to be suitable for the current situation and the changing business environment.



The Code of Conduct will be effective from 29 June 2022 onwards.