

# **Business Ethics**

**HaadThip Public Company Limited  
and Its Subsidiaries**

## Message from the Chief Executive Officer

This “Business Ethics Manual” was prepared to form the company’s business ethics standard and promote good disciplines in business operation processes. The expectation specified thereby includes all of our staff and good cultural enhancement based on the SET’s Good Corporate Governance Principles. Our company realizes that ethics cannot be excluded from business operations. Therefore, any decision on policy specification and management may affect stakeholders. For this reason, fair and transparent business operations are the main factor to increase competitive advantages and add long-term values for our stakeholders.

Consequently, it is vital to strictly abide by this manual which is not meant by the company to obstruct all operational aspects. Instead, it aims to create mutual understanding among our staff in preventing work risks and total or partial confusion caused by their operations. The company will therefore continue to protect our stakeholders by applying the mechanisms as specified by the complaint process.

All of the staff are highly expected to understand the principles, practices and intentions of the Company as provided in this manual. We would like to inform you that all of you play an important part in promoting the Company’s confidence in reflecting ethical values through operations. In case of enquiries, please consult your supervisors. Also, the practices given in this code of conduct are regarded to be part of the work requirements that the staff should abide by. Failure to follow them may be considered disciplinary offences. Consequently, this manual should be used as the work basics by all the staff.

I would like the Board of Directors, executives and all of the staff to thoroughly understand this business ethics manual and strictly follow it as our organizational culture in order to perpetually maintain the highest benefits of our company and the trust from all our stakeholders.

Maj. Gen. Patchara Rattakul

Chief Executive Officer

*“Good Corporate Governance and self-conduct under code of business ethics are the important basics of business administration for sustainable growth.”*

# Table of Contents

Topics	Pages
<b>Suggestions for using the Business Ethics Manual</b>	
<b>1) Principles of Business Operations</b>	<b>6-9</b>
1.1 Specification of Business Strategies and Directions	
1.2 Roles and Responsibilities of the Board of Directors of HaadThip Public Company Limited	
1.3 Anti-corruption	
1.4 Risk Management	
1.5 Internal Control and Audit	
1.6 Operational Monitoring and Evaluation	
1.7 Following the Legal Practices and Corporate Regulations	
<b>2) Conflicts on Benefits and Storage of Confidential Information</b>	<b>9-10</b>
2.1 Conflicts of Interest	
2.2 Recording, Reports and Storage of the Company's Information	
<b>3) Responsibilities of HaadThip Public Company Limited</b>	<b>10-15</b>
3.1 Protection against the Company's Properties and Respect on Others' Properties	
3.2 Computer, Information and Communication Systems	
3.3 Corruption and Bribery for Personal Benefits	
3.4 Giving and Receiving Gifts, Reception services and Business Banquets	
3.5 Document preparation	
3.6 Expressing Opinions and Interviewing with Mass Media	
3.7 Use of Political Rights	
3.8 Employing Government Officials	
3.9 Practices for Taxes	

<b>4) Practices on Stakeholders</b>	<b>15-21</b>
4.1 Practices on Shareholders	
4.2 Practices on Staff and Approaches to Personnel Management	
4.3 Practices on Customers	
4.4 Practices on Partners and Creditors	
4.5 Practices on Trading Competitors	
4.6 Practices on Communities and Societies	
4.7 Practices for Environmental Conservation, Energy and Natural Resources	
<b>5) Supervision for Following Business Ethics</b>	<b>21-22</b>
5.1 Staff	
5.2 Executives at All Levels	
5.3 Personnel Development and Human Resource Agencies	
5.4 Internal Audit Agencies	
<b>6) Reception of Business Ethics Complaints</b>	<b>22-24</b>
6.1 Risk Management and Corporate Governance Committee	
6.2 Whistleblowing and Protections for Complainants	
<b>7) Self-check</b>	<b>24</b>
<b>8) Ethics Reviews</b>	<b>24</b>

## How to Use the Business Code of Conduct Manual

**The Company** refers to HaadThip Public Company Limited and its subsidiaries.

**Those required to follow this Business Ethics Manual** are the Board of Directors, executives, and all of staff, including the staff of its subsidiaries, who follow the Board of Directors and the executives' conducts and use them as good examples.

### Recommendation of manual usage:

1. Understand the content of this Business Ethics Manual;
2. Study the content related to your duties and responsibilities;
3. Regularly review the content of this manual for better knowledge and understanding;
4. Educate people whose duties are related to the Company or probably affect the Company;
5. In case of enquiries, consult your supervisors or those authorized by the Company to monitor ethical conducts via the specified channels;
6. Keep the supervisors or authorized people informed if any unethical violation or non-compliance is found;
7. Collaborate with agencies or people authorized by the Company in inspecting facts; and
8. The supervisors at all levels are required to be leaders of ethical conducts, improve work environments for staff and related people and create the understanding that it is rightful and obligatory to follow the Business Ethics Manual.

*The way to achieve our goal is not less important than the one to become successful.*

*Ethical conducts are always correct practices.*

*Enterprise supervision and business ethics are like a layout that leads us to a successful future.*

*They are the approaches to specifying ethical standards, personal loyalty and compliance with the requirements, all of which are the important basics at the international level of the*

*"HaadThip Family".*

# **1 Business Operation Principles**

## **1.1 Specifying Business Strategies and Directions**

In operating our business for the stakeholders' highest benefits, the Company mainly applies the operational policies and methods to achieve corporate success. The goals of and approaches to such business operations are specified in "Corporate Vision, Mission and Living Values". For the Board of Directors' executives' and staff's comfort and understanding, a code of conduct is also specified in this manual, enabling them to be informed of our operational standards and approaches related to shareholders, staff, customers, partners, competitors and overall social members.

The Company focuses on using good governance for business administration and prioritizes the managerial and operational methods for the highest efficiency. However, all changes and adaptations are based on regular ethical and moral practices.

## **1.2 Roles and Duties of HaadThip Public Company Limited's Board of Directors**

The Board of Directors of HaadThip Public Company Limited is responsible for representing its shareholders in specifying the directional policies for business operations so that the Company will earn good performances and maintain its business operation both in short and long terms. Therefore, the roles of all the board members in supervising the executives are as follows:

- 1.2.1 To supervise the executives' specification and operation as required by the vision, mission, policy and framework until the goals are achieved; as for risk management, realizing that risk or damage is likely to occur to the Company, the Board of Directors may assist the executives by consulting the chief executive officer;
- 1.2.2 In terms of management, the Board of Directors may provide the executives with assistance and suggestions, systematic career paths and succession plans, and ethical management; and
- 1.2.3 To provide complaint channels, including a fair inspection system without affecting any complainants.

## **1.3 Anti-corruption**

The Company does not allow any of the Board of Directors, executives and staff to directly or indirectly perform or accept all forms of corruptive acts for their own benefits or for the benefits of those in the public and private sectors involving the Company's business. All the staff are required to collaborate in promoting the values of honesty and

responsibility as being the corporate culture. However, the content of the anti-corruption policy is required to cover the Company's operations as follows:

- 1.3.1 The Company evaluates risk in corruption and prepares operational measures in accordance with such risk, as specified in the internal audit system, with an annual revision.
- 1.3.2 The Company prepares operational stages which include adequate details for implementation as required by this policy and can efficiently prevent corruption in business operations.
- 1.3.3 The Company organizes a staff orientation and training for their better knowledge and understanding of the anti-corruption policies, measures and procedures.
- 1.3.4 The Company provides an internal audit system appropriate for its business operation to assure efficiency and effectiveness of the anti-corruption policy which covers financial and accounting data recording process, human capital management process and the Company's operation-related process.
- 1.3.5 The Company reports, monitors, and reviews conformity to the anti-corruption policy, using appropriate procedures to assure its completeness, adequacy, and recency.
- 1.3.6 The Company provides safe communication channels to its staff. Moreover, all the stakeholders can request for advice, reveal illegal secrets, make suggestions, or file complaints related to corruption, whose rights are protected with some measures.
- 1.3.7 The Company communicates an internal and external anti-corruption policy for operational extension and informs its affiliated companies controlled by the Company and its business representatives to implement the anti-corruption policy.
- 1.3.8 The Company promotes exchanges of good knowledge, experiences and practices among other companies under the same industry, including all related parties, enabling them to become allied operators and participants in anti-corruption activities organized by the Company or other regulatory associations, chambers of commerce or agencies.

#### **1.4 Risk Management**

The Company provides risk management that covers finance, raw material management, procurement, production, sale and marketing, personnel administration, social responsibility, legality, and other issues under the principles of risk management and evaluation based on the international standard, the effects of which on stakeholders are taken into consideration. The "Risk Management and Corporate Governance

Committee” specifies risk control measures, take responsibilities for, monitor operational outputs of, and inform the Company’s Board of Directors of summary reports.

### **1.5 Internal Control and Audit**

The Company provides an appropriate and adequate internal control system to ensure that the Company operates its business with consideration of operational efficiency and effectiveness, reliability, and accuracy of financial reports and compliance with related laws, rules, and regulations.

- 1.5.1 The Company uses internal audits as the main mechanism in measuring levels of appropriateness and adequacy of the internal control system and risk management.
- 1.5.2 The Company promotes understanding and realization in the significance of complying with the internal control and audit system among the Company’s staff at all levels.
- 1.5.3 The Company’s staff shall consider the internal control and audit system as part of its operation so that it can proceed efficiently, effectively, accurately and reliably.
- 1.5.4 The audit committee is responsible for monitoring and calibrating appropriateness and adequacy of the internal control system to constantly comply with the real business conditions.

### **1.6 Operational Monitoring and Evaluation**

The company monitors and evaluates all the staff’s operations so that they will proceed in compliance with the goals specified in the annual business plan and the operational plan. The operational evaluation system helps specify and develop the fair and efficient management plan, personnel development plan, and return consideration system.

### **1.7 Conformity to Legal Practices and Corporate Regulations**

All the executives and staff shall conform to official laws and rules, including the Company’s regulations, and avoid any involvement in illegal activities or the ones contrary to public order or good morals. Our staff is definitely forbidden to use the Company’s properties for illegal purposes. The operational laws, rules, guidelines, and regulations including the Company’s Authority Manual cover the following:

- 1.7.1 The executives and staff shall conform to the laws, rules, regulations, authority manual, code of conduct and operational principles specified and announced by the Company.
- 1.7.2 Violation of laws, shareholders’ or Board of Directors’ resolutions, regulations and the Company’s regulations or orders along with claims that such activities are conducted for the Company’s profits or other unacceptable reasons



- 1.7.3 All the executives and staff shall righteously perform their duties despite legal gaps or regulations or the Company's orders.

## **2 Conflicts of Interest and Storage of Confidential Information**

### **2.1 Conflicts of Interest**

- 2.1.1 The executives and staff shall avoid any involvement in activities resulting in conflicts between their own benefits and the Company's, probably emerging during their communication with any partner or person.
- 2.1.2 During their operations for the Company or after their work retirement, executives and staff shall not reveal the Company's confidential information for any person's benefits, including electronic, financial, operational, business, future framework or other kinds of information that may cause damage.
- 2.1.3 If any of the Company's executives or staff also works as a board member or consultant for other companies, organizations, business associations, they shall inform the Company in writing and request for the Company's approval.
- 2.1.4 The executives and staff shall not borrow any money from any of the Company's partners, except financial institutes, because that practice may affect their duties as the Company's representatives.
- 2.1.5 The executives and staff are forbidden to sell, distribute, or transfer the Company's money or properties to any other person without authorities' approval.
- 2.1.6 All the executives and staff shall fully devote themselves and time to the Company's business. If they need to do other part-time jobs for more earnings or other reasons, their jobs must be characterized as follows:
- 2.1.6.1 not violating any laws or not being contrary to public order or good morals;
  - 2.1.6.2 not being contrary to the Company's benefits;
  - 2.1.6.3 not adversely affecting the Company's fame or business; and
  - 2.1.6.4 not revealing the Company's secrets for their or their relatives' benefits

### **2.2 Recording, Reports and Storage of the Company's Information**

- 2.2.1 Since the business data and documents are the Company's valuable properties, each of the departments shall specify the duration of data storage, which involves correct and complete storage methods ready for regular inspections.

- 2.2.2 The Company's personnel shall inform correct, straightforward, and true information without any forgery, disguise or distortion.
- 2.2.3 The Company provides an ultimately strict and limited storage of its important business information, including confidential data related to the Company and its stakeholders. Even after their retirements, the board members, executives and staff are forbidden to reveal them to unrelated people inside and outside the Company, except that such a practice conforms to legitimate regulations or the Board of Directors' resolutions.
- 2.2.4 The Company's personnel shall not wrongfully use the Company's internal unpublicized data for their own benefits and others'.
- 2.2.5 Any outsider possibly involving or obtaining the Company's important information shall sign his/her name in the Confidentiality Agreement to ensure that those people will keep the internal secrets and data as carefully as the Company's personnel.  
Revelation of important business information shall be made only by the Company's authorities. When inquired about important business information, they should advise the inquirers to contact authorized

### **3 Responsibilities of HaadThip Public Company Limited**

Apart from strict compliance with laws, the executives and staff shall perform their duties and responsibilities according to ethical principles. The Company consider that responsibility for the Company is one of the executives and staff's duties.

#### **3.1 Protection against the Company's Properties and Respect for Others' Properties**

- 3.1.1 The Company's properties include any of the Company's movable properties, immovable properties, technology, academic knowledge, data, copyright, intellectual properties, and resources or the ones under the Company's legal possession.
- 3.1.2 All the executives and staff's duties and responsibilities are to fully economize and utilize the Company's properties for the Company. Moreover, they are responsible for protecting them from damage or loss.
- 3.1.3 To reduce chances of infringement of others' intellectual properties, all the executives and staff shall respect them without any infringement. If any infringement of intellectual properties, or seemingly, occurs, please immediately inform your supervisors.

## **3.2 Computer, Information and Communication Systems**

An information system means a computer system, a communication network system, an internet access network system, a data storage system, an electronic letter system, all types of information communication systems, communication device information, computer devices and related peripherals under the Company's possession.

All the executives and staff shall comply with the legitimate rules and regulations, including the policies and standards of information technology operation as follows:

### **3.2.1 Electronic Communication**

3.2.1.1 All the executives and staff shall carefully use electronic communication for revealing data. Confidential data shall be processed with special procedures, such as strict and concise encoding and storage of such codes.

3.2.1.2 The executives and staff are forbidden to use electronic communication for their own benefits and should avoid any form of communication probably disgracing the Company. Also, they shall not present or forward data contrary to laws and good morals or damaging or disgracing the Company.

### **3.2.2 Use of the Internet**

3.2.2.1 The Company promotes use of the Internet within the scope of following duties as assigned. Use of the Internet is regarded as a learning tool mainly based on the Company's benefits.

3.2.2.2 The executives and staff shall avoid use of illegal websites or violate good morals and refrain from spreading such data or websites to others inside and outside the Company.

3.2.2.3 In case of enquiries about illegal conduct and moral violation of any website, please consult the Company's information technology department.

### **3.2.3 Supervision of Personnel Information Protection and Information Access**

Personal information refers to a person's information which can directly or indirectly identify that person, as specified by the Personal Information Protection Act, including personal information of all the Company's staff, directors, customers, partners and stakeholders. The scope of the policy is as follows:

3.2.3.1 The Company will manage personal information and collect, use, or reveal and control the Company's internal operations, as required by the Personal Information Protection Act and other related laws, to ensure that all their personal information will be protected as specified by laws.

- 3.2.3.2 The Company has appointed the Data Protection Officer Team to provide the staff with knowledge and understanding, make a policy-driving plan, inspect and supervise the personal information protection policies and practices of the staff, customers, partners, and related people in a concrete and lawful manner.
- 3.2.3.3 Any staff member who infringes or violates the designated policies or announcements is regarded to have infringed the owners of personal information and the Company. This practice is also considered a disciplinary and lawful offence.
- 3.2.3.4 Only the assigned executives or employees have rights to access data files stored in computer data files or other forms.
- 3.2.3.5 The executives or employees are forbidden to access, spread, delete, dispose of, or modify data or change passwords or perform any act causing damage to the Company without permission. Any form of data access, including deletion, disposal, or modification of data as well as passwords shall always be approved by the authorities, as specified by the Company's regulations.

#### 3.2.4 Use of Telecommunication Media

The company provides telecommunication equipment for its business benefits. Use of telecommunication for personal businesses is considered appropriate as long as it is not contrary to laws and good morals or the Company's regulations.

#### 3.2.5 Use of Software and Equipment

All the executives and employees using computers shall not use illegal software or equipment probably causing damage to the Company.

### **3.3 Corruption and Bribery for Personal Benefits**

- 3.3.1 The Company provides a policy against all forms of corruption, such as bribe offering or receiving, facilitation payment, bid or purchase rigging, stealth, and corruption in job inspection, account payable or supply disbursement systems.
- 3.3.2 The Company promotes establishment of an operational supervision and inspection system, including raising awareness and motivation among employees in all forms of anti-corruption via different mechanisms, such as specifying rules and regulations in corruption-prone activities as well as channels for reporting policy infringement or violation.
- 3.3.3 In case of corruptive acts, the Company conducts an investigation to obtain facts in accordance with the Company's regulations and strictly takes legal actions. Based on laws and human rights, the accused will be investigated.
- 3.3.4 Bribe Offering and Receiving

- 3.3.4.1 The executives and employees shall avoid presenting or offering benefits or properties to outsiders, aiming to persuade them to or not to perform illegal acts, or wrongful acts against their duties.
- 3.3.4.2 The executives and employees shall not request for any benefits or properties likely to persuade them to perform their duties because such a practice may cause the Company loss of its fair benefits.

### **3.4 Giving and receiving gifts, reception services and business receptions shall be characterized as follows:**

- 3.4.1 Correctly, openly, and transparently organized on behalf of the Company
- 3.4.2 not contrary to good morals, laws, and regulations of the Company, government agencies, state enterprises and other related agencies
- 3.4.3 Not causing any direct or indirect conflicts between personal benefits and the Company's collective benefits if such acts affect the Company's operation
- 3.4.4 The executives and employees shall avoid giving and receiving any gifts or properties from partners or stakeholders related to the Company's business, except the ones received during rural festivals, customs, or traditions and the ones of decent values, that is, worth less than 3,00 baht. Recipients should take their gifts into consideration and consult their supervisors. In case of doubt, the supervisors should consult the risk management and business supervision committee.
- 3.4.5 The executives and employees should avoid giving or receiving any reception beyond their normal relationship offered by other people whose businesses are related to the Company's work.
- 3.4.6 If any employee is facing a difficult or probably self-threatening situation, he/she may consider making a payment or offering any other benefit and thereafter prepare a document in writing for recording clear and correct data, which will be used as evidence for later inspection.

### **3.5 Document Preparation**

All the executives and employees shall carefully and honestly prepare business, accounting and financial documents, including reports to be submitted to government sectors and other people. Also, the documents shall be recorded with the Company's accounting system, as required by the standard.

### **3.6 Opinion Expressions and Media Interviews**

Revelation of the Company's data is considered to be the executives and employees' responsibilities. They shall strictly store the Company's confidential data, especially unpublicized internal data or business operation affecting data. The practices are specified as follows:

- 3.6.1 The Company has authorized the chief executive officer to declare or assign his representative to declare the Company's operation to mass media and outsiders.
- 3.6.2 Revelation of business operation affecting data shall be approved by the chief executive officer who will reveal the data himself or assign his representative to reveal such data.

### **3.7 Use of Political Rights**

The Company encourages the directors, executives and employees to use their rights as good citizens but not to participate in any activity probably causing an understanding that the Company involves or supports any political party. The practices for the board of directors, executives and employees are specified as follows:

- 3.7.1 The Company shall be politically neutral and not perform any act indicating alignment or support for a political party or group.
- 3.7.2 The Company encourages the directors, executives and employees to use their rights as good citizens, as specified by constitutional and other related laws.
- 3.7.3 The Company promotes establishment of an appropriate and transparent democratic process by respecting rights and protecting benefits of social members and maintaining Democratic from the Government with the King as Head of State.
- 3.7.4 The Company does not allow the directors, executives and employees to directly or indirectly use the Company's properties and resources for political benefits of a political party or group.
- 3.7.5 The executives and employees shall avoid participating in any activity probably suggesting that the Company has some political involvement or alignment in a political party or group.
- 3.7.6 If an event is organized at the Company, the Company's employees or representatives shall transparently collaborate with government organizations or local politicians without any bribery or enticement.

### **3.8 Employing Government Officials**

The Company has specified the government official employment policy in compliance with good corporate governance principles so that its operation will smoothly and transparently comply with the objectives. The practices are specified as follows:

- 3.8.1 The Company supports a constitution and law-abiding policy by remaining politically neutral and encourages the Company's personnel to have duties, rights, and freedom, as specified by constitutional and other related laws.
- 3.8.2 To adopt the practice of specifying the employment policy for government officials possibly employed to work as the Company's board of directors, executives, staff and employees, or consultants, the Company will provide selection, employment approval, return specification, and control processes

to ensure that employment of government officials is not a reward in exchange of any benefit because this may destroy the Company's image regarding its operational reliability and honesty.

- 3.8.3 The Company will not employ a government official if his/her employment results in the Company's or mutual benefits.
- 3.8.4 The personnel administration manager is responsible for calibrating the government official employment in compliance with this policy. In case of any employment, he/she shall immediately inform the risk management and corporate governance committee.
- 3.8.5 Violation, negligence, non-compliance with the specified approach are considered disciplinary offences and penalized as required by the Company and may be legally penalized if found illegal.

### **3.9 Tax Practices**

The Company provides an appropriate and sustainable tax management, promotes highest benefits to its stakeholders, enabling those related with the Company's tax to operate tax issues in compliance with the Company, and encourages every company worldwide to legally perform transparent tax operations, as specified by the Company's objectives of being a good social and national organization, promoting and encouraging sustainable development and appropriate tax management. The operation and performance principles are as follows:

- 3.9.1 A fair, transparent, responsible, accurate and complete tax strategy is specified in compliance with related tax supervision laws, requirements, regulations, and processes, without tax evasion, and in compliance with the business strategy for the shareholders and stakeholders' highest and sustainable benefits, as specified in the approach to being a good social organization.
- 3.9.2 The executives and staff shall strictly abide by ethical rules to prevent tax risks probably damaging the Company's fame and properties. Finance, accounting and risk-related agencies are responsible for tax risk control, tax payment management, timely tax remittance, tax refund and tax privileges to obtain the highest efficiency, as required by related laws or regulations, including employing tax consultants or experts to provide advice. Tax practices are regularly reviewed for fair and beneficial tax operations.

## **4 Practices on Stakeholders**

The Company will equally treat its stakeholders and those in contact with the Company, respect their dignity and prestige without discrimination in races, religions, color, sex, nationality, social backgrounds, social classes, marital status, sexual preferences, disability, political membership and health conditions.

## **4.1 Practices on Shareholders**

- 4.1.1 The Company operates its business honestly and transparently, being equally responsible for every shareholder and revealing accurate, complete, and standard data to shareholders under the framework of laws, ethical rules, and good corporate governance guideline, to protect and increase the shareholders' highest benefits.
- 4.1.2 The Company shall not seek any benefits for itself or other related people by revealing any of its confidential or unpublicized internal data to the public or outsiders because this practice will cause negative effects to the Company.
- 4.1.3 The Company's status and performance, including the information for all the shareholders, shall be equally, regularly, punctually, completely and accurately reported, as specified by related laws.
- 4.1.4 The Company facilitates and encourages all the shareholders by supervising their practices in compliance with the policy so that the shareholders' meeting can proceed as required by the laws and guidelines of the shareholders' meeting.
- 4.1.5 All the executives and staff shall be determined to create business growth to the Company, based on their actual potentials or capability, so that the shareholders will be given sustainable returns from their efficient work and the Company's good performance.

## **4.2 Practices on Staff and Approaches to Personnel Management**

The Company realizes the values of human resources and wishes its staff to take pride in their organization full of collaborative atmosphere and equal vocational progress. All the staff will be promoted to thoroughly and continually have knowledge and capability for creating values and maintaining business excellence for the organization. The following are the operational aspects:

- 4.2.1 Equality and Equal Opportunities
  - 4.2.1.1 The Company treats all women as equally as men without any discrimination in education, employment, training, promotion, retirement, social and economic activities, marriage rights, and family environments.
  - 4.2.1.2 The Company promotes all operations showing that the disabled will be appropriately given dignity, prestige, participation and protection.
  - 4.2.1.3 The Company respects the rights of local people, including legally migrating workers, in all activities involved with the Company.
  - 4.2.1.4 The company selects people to be employed for positions, based on their educational qualifications, experiences and other requirements necessary for work, without any discrimination in sex, ages, races, religions, etc.



- 4.2.1.5 The Company fairly specifies the staff's remunerations appropriate with the Company's work conditions and characteristics, performances, and wage structures to pay such remunerations.
- 4.2.1.6 The Company encourages the staff to attend trainings and develop their potentials to improve work efficiency and offers them opportunities of work progress.
- 4.2.1.7 The Company realizes that good communication will result in good efficiency and relationship of cooperation, therefore encouraging the staff to be regularly informed of related information at timely occasions, such as Internet, HaadThip Journals.
- 4.2.1.8 The Company provides the staff with opportunities to have communication channels, make suggestions, and file complaints about their work constraints. Their suggestions will be taken into serious consideration and solutions will be given for every sector's benefits in compliance with the human rights principles, creating good work relationship among the staff. The Company provides opinion boxes and electronic channels where the staff can thoroughly express their opinions.

#### 4.2.2 Reciprocity under Human Rights

The Company takes into accounts humanity, rights, freedom and equality of people certified or protected in the Thai Constitution or laws or treaties of which the obligations shall be followed by the Company.

- 4.2.2.1 The Company equally treat the staff without any discrimination in birthplaces, races, sex, ages, color, religions, disability, financial status, family backgrounds, education, travel, politics, physical appearances or any other status not directly related to operations.
- 4.2.2.2 The Company provides all the staff with opportunities to have equal rights of work under the Company's rules, regulations, announcements, and orders.
- 4.2.2.3 The Company aims to promote and support basic human rights in accordance with practicable approaches, such as no child abuse or other issues that reflect no respect of the human right principles and specify them to be part of the Company's policy.
- 4.2.2.4 The Company strictly abides by the human rights principles, provides knowledge and understanding of the human rights principles, to the staff for their implementation as part of operation and support, and does not support any activities or businesses which violate the human rights principles. The Company also provides channels for receiving complaints about human rights violation to find protection and correction approaches. The staff can report clues or file complaints via the Company's specified channels.

- 4.2.2.5 The Company provides the staff with personal information care by considering it confidential, not sending or spreading personal data to other unrelated people, revealing or transferring personal information without any consent from information owners.
- 4.2.2.6 All the staff shall not perform any act of sexual intimidation to the Company's staff or outsiders who make business contact with the Company, including possession of verbal and contact pornography.
- 4.2.2.7 The Company shall not have any involvement with any agency, organization, and person that violates human rights in all cases.
- 4.2.2.8 The supervisors should behave respectfully to the staff and the staff should not behave disrespectfully to their supervisors.

#### 4.2.3 Safety, Hygiene, and Environment

The Company is determined to provide the staff, communities, environment and workplaces with well-being and maintain good environments and therefore specifies operational methods for their work safety, as specified by related laws and regulations as follows:

- 4.2.3.1 The Company evaluates and manages risks, policies on accident, injury, illness and prevention, and their environmental impacts caused by the company's operation, focusing on all the staff's active cooperation in order to limit and control risks within the scope of safe business operation.
- 4.2.3.2 The Company shall strictly abide by safety laws and regulations and adopt and impose the reliable safety management standard in case of no laws and regulations, such as the Coca-Cola Quality system.
- 4.2.3.3 The Company designs equipment and tools, prepare regulations, make an operational plan, and organizes a new staff training for their adequate understanding and knowledge of work safety information, in order to prevent them from danger probably caused by machinery, working methods, or diseases.
- 4.2.3.4 The Company does not encourage the staff to take narcotic drugs, drink alcohol, or use any addictive substance during or out of their work hours, trying to provide them with necessary information for their realization of the negative effects of addictive substances, including preparing tools for testing drug-taking and alcohol-drinking at illegal levels, if necessary. If any staff member is found having any illegal addictive substance in his/her body, drinking alcohol, or taking other addictive substances while operating duties at a level probably causing damage to operation, he/she will be given disciplinary penalty.

### **4.3 Practices on Customers**

With determination to create satisfaction to its customers, the Company relies on the fair business operation practices which benefit the customers and consumers as follows:

- 4.3.1 Fair and equal customer treatment, based on reception of fair returns to both parties and delivery of quality goods at fair prices;
- 4.3.2 Determination to supply, develop and produce quality goods for customers' need satisfaction and after-sale service provision for efficient facilitation to customers;
- 4.3.3 Study, evaluation, and improvement of effects of goods prevailing to customers, including goods control in compliance with standards, regulations, customer protection laws, or other related laws
- 4.3.4 Provision of information accurate, adequate, and useful enough for customers' decision-making, without any overstatement, intention to conceal contents, provision of true information, intention to mislead customers, which cause customers' misunderstanding about any goods quality or condition.
- 4.3.5 Respect in customers' and personal rights, including protection for customers' personal information, without any revelation of their personal information to outsiders, as specified by related laws;
- 4.3.6 Contracts between the Company and its customer(s) in compliance with legal requirements, with adequate and accurate information and agreements, without any specification of unfair requirements or violation of customers' rights, including strict compliance with agreed contract or conditions. In case of failure to abide by any of the conditions, the company shall immediately inform the customers.
- 4.3.7 Provision of efficient systems and channels for customers to file complaints about goods quality and services, so that the Company can protect and rapidly and appropriately solve customers' problems and use such data for improving or developing such goods and services.

### **4.4 Practices on Partners and Creditors**

The Company has a policy of providing fair and equal treatment to customers and creditors. If unable to perform operations as required by mutual conditions or agreements, the Company will inform and accelerate negotiations with its partners and officials beforehand in order to collaboratively seek preventive and corrective approaches to avoiding damage to all parties.

- 4.4.1 The Company will provide standard goods and services under the following principles:
  - 4.4.1.1 Equality in data competition
  - 4.4.1.2 Criteria in evaluating and selecting partners and parties
  - 4.4.1.3 Preparation of fair and appropriate contractual formats

- 4.4.1.4 Provision of management and monitoring systems to assure their full compliance with the contractual conditions and prevention of corruption and misconduct at every stage of the procurement and payment process for partners and counterparties as specified in the agreed payment condition
- 4.4.2 The Company is determined to develop and maintain sustainable relationship with partners and parties having clear objectives in worth-paying goods and service qualities and reciprocal reliability
- 4.4.3 The Company supports public policies which promote fair competitions, including anti-monopoly and market dumping.
- 4.4.4 All the executives and staff should realize the importance of behavior and conduct in compliance with trade competition laws and fair competitions. They are definitely forbidden to receive any personal benefit from partners and parties.

#### **4.5 Practices on Trade Competitors**

The Company adheres to the approaches to the international principles for trade competitors under the legal scope, not violating or seeking business secrets of trade competitors with fraudulent, dishonest techniques and not defaming them with slandering, even though the competitors perform unlawful or unethical acts to the Company.

#### **4.6 Practices on Communities and Societies**

- 4.6.1 The company has a business operation policy in consideration of communities and societies and will perform business in accordance with related ethical rules and legal and regulatory requirements, including the rural government agency's regulations, such as municipality, sub-district administrative agencies.
- 4.6.2 The Company's is determined to developing business-performing communities and overall societies in economic, social, and communal aspects, and encouraging the Company's personnel to have volunteer spirit and social responsibility without expecting any reward.
- 4.6.3 If no laws or regulations are applicable, the Company should responsibly treat communities and societies by encouraging its personnel to have public awareness and responsibilities, as specified in the following approaches:
  - 4.6.3.1 The Company publicly informs communities of environmental issues, including exchanging knowledge and experiences with other agencies, for continual and regular environmental maintenance and operational improvement in appropriation with environmental conditions.

- 4.6.3.2 The Company continually promotes job creation, work skill improvement and, educational and learning development, including conservation of art and culture of the communities where the Company is located.
- 4.6.3.3 The company's administration aims to prevent any effects on communities and societies. Regular and continual performance reviews and evaluations are conducted for monitoring progress and assuring the Company's compliance with the policies specified.

#### **4.7 Practices for Environmental Conservation, Energy and Natural Resources**

- 4.7.1 The Company shall abide by laws, regulations, environmental management standards and other requirements related to environment, energy and natural resources in its business operations.
- 4.7.2 The Company is determined to operate its business under environmental consideration, including ecological management, biodiversity, climatic conditions, and environment.
- 4.7.3 The Company is determined to administer operations by aiming to prevent and control environmental effects and control activity operations probably at risk of wasteful use of energy and natural resources.
- 4.7.4 The Company is determined to make continual environmental management reviews and developments, including energy economy, use of renewable energy, resource conservation, material reuse, and correct disposal of waste and hazardous objects.
- 4.7.5 The company organizes continual evaluation and monitoring of performances or effects on environment, energy, and natural resources.
- 4.7.6 The Company is determined to provide stakeholders with correct knowledge and understanding of environmental, energy and natural resource conservation in order to create beneficial innovations, including promotion, collaboration, publication, and public relations of activities related to organizations, government agencies, societies, and the general public.

## **5 Supervision for Following Business Ethics**

### **5.1 Staff**

The staff shall abide by the ethical rules with their understanding, acceptance, and faith, be careful and avoid any unethical conducts. In case of enquiries, the staff can consult their supervisors, the human resource division, the risk management and business supervision committee or the CEO's office.

## **5.2 Executives at All Levels**

- 5.2.1 Promote ethical conducts and behave themselves as good examples;
- 5.2.2 transfer policies and practices and widely accept opinions of ethical conducts;
- 5.2.3 Organize staff's trainings to promote their responsibilities and provide management systems in compliance with the Company's rules and regulations; and
- 5.2.4 Supervise operations of agencies in compliance with the Company's rules and regulations

**5.3 Personnel Development and Human Resource Administration Departments** are responsible for informing the staff of their duties in ethical conducts, including the Company's operational rules, regulations, and practices.

**5.4 Internal Audit Department** is responsible for calibrating basic data, in case that violation of rules, regulations and ethics is very likely to occur, and reporting to the Audit Committee and the line of authorities.

## **6 Reception of Business Ethics Complaints**

### **6.1 Risk Management and Corporate Governance Committee**

The Company has appointed the Risk Management and Corporate Governance Committee to receive business ethics complaints before submitting them to the CEO for consideration. The committee will then examine and analyze the complaints. In case of correction or operation in any issue, the committee shall report the CEO for immediate operation, before reporting the Board of Directors.

### **6.2 Clue Reporting and Complainant Protection**

These processes aim to encourage and enable both internal and external stakeholders to participate in a good corporate governance process. In case of having enquiries or finding any acts possibly violating or not abiding by laws, rules, regulations, code of conduct or corporate governance policies, the staff and groups of stakeholders can make enquiries, report clues or file complaints, along with submitting details and evidence to related people or departments via the following channels:

- sending letters or making verbal complaints to the CEO or any trustful executive of all levels
- emailing to [anticorruption@haadthip.com](mailto:anticorruption@haadthip.com)
- accessing intranet and then choosing the menu 'complain or report clues' at <http://whistleblower.haadthip.com/>

- scanning the QR Code



#### 6.2.1 Clue and Complaint Consideration

- 6.2.1.1 Details of clues or complaints shall be true, clear or adequate for tracing facts for further operation.
- 6.2.1.2 Clue reporters or complainants can choose not to reveal their names, addresses, or contact numbers, if such revelation is considered to possibly result in any unsafety or damage. However, self-revelation will enable the Company to report progress, enquire further useful information, explain facts, or reduce damage more smoothly and rapidly.
- 6.2.1.3 Clue reporters or complainants, whether they are the Company's staff or outsiders, will be protected against their rights.
- 6.2.1.4 The duration for complaint operation, complexity of complaint, adequacy of documents and evidence given by complainants, including documents, evidence and explanations given by the accused.
- 6.2.1.5 Complaint receivers and stakeholders related to the fact-finding process shall store related confidential data and reveal as much data as possible, under consideration of a complainant's safety and damage.
- 6.2.1.6 If complainants or fact finders consider that they may be unsafe or damaged, they can ask the Company to specify appropriate protective measures. Moreover, the Company may specify protective measures without complainants or fact finders' requests, if the complaint is likely to cause damage or unsafety.
- 6.2.1.7 Those affected by complaints will be given relief with fair and appropriate measures.
- 6.2.1.8 Defamer or a reporter of false clues or complaints will be given disciplinary or legal penalty.

#### 6.2.2 Protection against the Rights of the Company's Staff, Employees or Workers

The Company shall not perform any unfair acts to the directors, executives, staff, employees, or workers, by shifting work positions, work nature, or workplace, suspension, threats, disturbance, dismissal, or other unfair acts to such people, who will do the following:

- 6.2.2.1 Make a complaint, when finding an event or item suspected of wrongdoing, corruption, violation or non-compliance with business supervision rules, regulations, requirements, code of conduct or policies.
- 6.2.2.2 Report clues, give information, cooperate, or provide assistance for any reason to the board of directors, executives, government agencies or supervising agencies for the benefits of considering or inspecting cases suspected of violation or non-compliance with business inspection laws, rules, code of conduct, or corporate governance policies.
- 6.2.2.3 Reject corruptive acts, even though such acts will cause the Company to lose business opportunities. The Company will store confidential data and not reveal the clue reporters' or complainants' names to the public without any permission, except that such revelation is legally required.

### 6.2.3 False Complaints

Complainants shall act in good faith without intention of defaming other people or organizations. If reporting of clues and complaints, testimonies, or any information proved to be dishonest acts is false, nonsensical or intentionally defaming to other people or organizations, the Company will operate according to the Company's procedure or related laws.

## 7 Self-check

If the board of director, executives and staff wonder whether your acts are correct and compatible with the Company's code of conduct, please ask yourselves the following questions:

- 7.1** Are such acts fair and correct?
- 7.2** Do such acts take such a lot of advantages that related people suffer from loss or damage?
- 7.3** Are such acts accepted or revealed to the public?
- 7.4** Do such acts defame the company?

## 8 Ethics Reviews

The Company provides regular reviews of code of conduct in the Company's business operation at least once a year in compliance with the Company's policies and related laws, including business environments and obligatory laws.

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# HAADTHIP

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