

Code of Conduct

1. Responsibility to Laws and Company Regulations

Directors, executives and all employees shall maintain the highest standards in the following areas in the Company's business operations:

- Directors, executives, and all employees shall respect the laws and regulations of Thailand, both in written and the spirit of laws and shall comply with the rules and regulations of the Company.
- Violation of law and regulations of Thailand or the Company's regulations by claiming that it is for the benefits of the Company is an unsound argument.
- The behavior that competitors of the Company or other companies generally practice in the business field may not be accepted or performed by the Company.

2. Responsibility to Stakeholders

The Company is recognized as an importance of the rights of stakeholders and has a policy to supervise and ensure the build of confidence for the stakeholders by attaching great importance to the stakeholders, whether shareholders, employees, customers, partners, creditors, competitors as well as society, communities and environment. The Company also encourages cooperation between the stakeholders according to their roles and duties for smooth and stable business operation that meets the needs of all parties. The directors, executives and employees are obliged to comply with the specified policies to ensure that the basic rights of all stakeholders are protected.

2.1 Policy and treatment of shareholders

- 1) Perform their duties with integrity, transparency and fairness to ensure any decision-making provides optimal benefits to all relevant groups
- 2) Perform their duties professionally with knowledge, expertise, intention, carefulness, knowledge application and managerial skill
- 3) Report on complete and accurate organizational situations on a regular basis
- 4) Do not attempt to benefit themselves or any other outside person with the Company's undisclosed information
- 5) Do not disclose the Company's confidential information to outside people, especially competitors
- 6) Do not proceed with any matter which may cause any conflicts of interest

2.2 Policy and treatment of Employees

- 1) Provide appropriate remuneration to the employees, based on the employees' knowledge, capabilities and as appropriate including benefits which exceed than those required by law
- 2) Provide employees with equal opportunity for human resources development
- 3) Avoid any unfairness that may threaten or pressure or affect the work stability of employees

- 4) Create work environmental conditions with concerns of safety to employees' lives, physical conditions, health and assets regularly
- 5) Abide by the laws and regulations relevant to the employees
- 6) Treat employees fairly and equally without discrimination based on race, religion, gender, skin color, or ethnicity, including people with disabilities and other disadvantaged groups. The Company prohibits child labor and opposes all forms of sexual harassment.
- 7) Comply with all applicable laws and regulations relating to employees.
- 8) Provide channels and opportunities for employees to report legal violations within the Company and submit complaints.

2.3 Policy and treatment of Customers

The Company is committed to continuously developing a strong service-oriented culture in order to exceed customer expectations and achieve the highest level of customer satisfaction. Finally, we must understand our customers' needs so that the Company can provide appropriate services and effectively respond to their requirements, as follows:

1. Provide products and services with quality including maintaining its quality standard
2. Disclose complete and accurate information relevant to products and services
3. Provide guarantees under appropriate time and conditions
4. Do not deliver damaged or defective products and services to customers
5. Establish a system to allow the customers to question or comment on the Company's products and services and quickly respond
6. Keep customer information confidential and do not exploit such confidentiality with dishonest purposes for personal benefit or the benefit of outside persons
7. Adhere to the customers' requirements and conditions strictly. In a case that the conditions may not be met, the executives must quickly inform the customer and work to jointly reach a solution
8. Establish channels for customers to provide feedback or submit complaints regarding products and services, in accordance with the Company's Whistleblowing Policy.

2.4 Policy and treatment of Traders and/or Creditors

1. Strictly follow the trade partners and creditors' conditions. In a case that the conditions are not met, the executives shall inform them beforehand to jointly find a solution and protect against any damage
2. Do not request or receive personal benefits or give benefits to trade partners, debtors or creditors for dishonest purposes
3. Exchange knowledge to jointly develop products and services while fostering strong and positive relationships.

4. Report financial information accurately and completely

2.5 Policy and treatment of Competitors

1. Abide by the rules of competition framework
2. Avoid tarnishing or making accusations against competitors or their products without integrity, information and truth
3. Do not access a customer's confidential information without integrity or appropriateness

2.6 Policy and treatment of Social Communities and Environment

1. Support any activity that is beneficial to society, communities, and environment as a whole
2. Return part of the Company's profits to society-related activities on a regular basis
3. Continuously cultivate awareness among employees at all levels regarding responsibility toward society, communities, and the environment.
4. Strictly comply and ensure compliance with the intent of applicable laws and regulations issued by relevant regulatory authorities.
5. Refrain from assisting or supporting any actions intended to circumvent or violate applicable laws and regulations.
6. Do not do anything that impacts natural resources or the environment
7. Promote the education and training on the environment for its employees in order to instill and raise awareness of environmental responsibility in operations as follows:
 - Cultivate the concept of environmental responsibility to employees to achieve better understanding and appreciation of the importance of environmental stewardship by providing staff the environmental training.
 - Organize the campaign to raise the awareness of importance of nature and environment and through various activities.

3. Responsibility for the information and assets

3.1 Protection of Company's Assets

1. Shall be responsible for the Company's resources and assets to maintain effectiveness and to maximize benefits and shall not use them for personal benefits.
2. All staff are prohibited from falsifying documents and reports, and shall prepare documents in good faith, prudence, and shall not misuse the Company's property for illegal purposes.
3. Shall be careful to disclose or leak any document, report or confidential document which may negatively affect the Company.

3.2 Computer and Information Technology

The Company places great importance on the secure and efficient use of the organization's information technology systems, ensuring consistency in standards and compliance with relevant legal requirements. To ensure that information technology operations are conducted appropriately and consistently across the organization, the Company has established policies and guidelines for the use of information technology systems as guidance for employees at all levels, as follows:

1. Information Security Policy and Guideline
2. Acceptable Use Policy

All employees are required to study, understand, and strictly comply with these policies and guidelines in order to collectively maintain the security standards of the Company's information and information technology systems, ensuring they remain secure, reliable, and trustworthy at all times.

3.3 Use and Maintenance of Intellectual Property

1. Respect and do not violate the intellectual rights of others. Review and check for the copyrights and intellectual rights of works obtained or to be used in the Company.
2. Refrain from any act violating intellectual property and/or an offense under the Computer Crime Act.
3. In entering any contract or juristic act, it should be clearly agreed on intellectual property rights. If in doubt, consult with legal consultant.

3.4 Protect against Insider Information

The Company has a policy and method to prevent the directors, executives, and employees from misuse of the Company's inside information for their own benefits. The details are as follows:

1. Directors, executives and employees of the Company shall at all times keep the company's secrets and/or inside information confidential.
2. Directors, executives and employees of the Company shall not disclose any inside information or exploit it for their own benefits or others' benefits in a direct or indirect way and with or without financial benefit.
3. Directors, executives and employees of the Company shall not trade, transfer, or pass the Company's securities and/or inside information to anyone and this includes their spouses, children and related persons. Those who infringe this clause are considered to have made a serious wrongdoing.
4. Educate Directors and executives on their duty to report their securities holdings of their and their spouses as well as their children and also to inform them of the penalty for wrongdoing

under the Securities and Exchange Act of 1992 and the regulations of the Stock Exchange of Thailand.

5. The Company executives are required to report changes in securities holdings to the Office of the Securities and Exchange Commission under Section 59 of the Securities and Exchange Act of 1992 and deliver a copy of this report to the Company on the same day in which the report is sent to the Office of the Securities and Exchange Commission.
6. Disclose the securities holdings of company's directors and executives completely and accurately in the annual report as required by the Office of the Securities and Exchange Commission.
7. The Company will send a circular to inform executives who have material inside information that may affect the securities pricing. They must suspend the trading of company shares before the announcement of financial statements or making such information public and shall not disclose such material information to any person. In addition, to ensure all employees follow the same guidelines regarding the use of inside information. The Company has published this information in the employees' manual.

3.5 Disclosure of Information and Media/Public Interviews

The Company recognizes the importance of providing accurate, transparent, and useful information to the public in order to maintain the credibility and reputation of the organization. Employees at all levels are required to comply with the following guidelines:

1. Information Disclosure: Executives and employees must disclose the Company's information in accordance with the rules and requirements of relevant regulatory authorities, such as the Stock Exchange of Thailand, as well as applicable laws, regulations, and other related requirements. Such disclosure must be conducted carefully, accurately, and completely to prevent misunderstanding or potential damage to the Company.
2. Authorized Spokespersons: The authority to disclose information or provide interviews on behalf of the Company to shareholders, investors, the media, or external parties rests solely with the Chairman of the Executive Committee, the President, or the Senior Executive Vice President, unless otherwise specifically authorized in writing by the authorized person.
3. Communication by Employees: Employees are not permitted to express opinions, disseminate, or disclose any information regarding the Company to external parties or public media unless it is part of their officially assigned duties. This is to ensure the accuracy of information, prevent potential harm, and promote consistent communication on behalf of the Company.

4. Responsibility to occupational health and safety

4.1 Health and Sanitation Practices

The Company attaches great importance to health and sanitation by providing annual medical examination, health insurance and medical expense reimbursement for employees, sufficient and appropriate employee welfare as well as promoting exercise for better health of all employees.

4.2 Safety and Working Environment Practices

The Company attaches importance to safety of the lives and property of employees and therefore provides a safe and hygienic working environment, protection devices, control and minimize the potential risk of accidents and health during the operation, including training, as well as providing virtual training and practice for potential emergencies or accidents.

5. Conflict of Interest

5.1 Conflicting Interest

Directors, executives, and employees of the Company must not have any conflict of interest or seek personal benefits in relation to their duties and responsibilities within the Company. Accordingly, the Company has established the following guidelines:

1. Avoid entering transactions in which they have a personal interest that may give rise to a conflict of interest, except where such transactions are necessary for the benefit of the Company. In such cases, the transactions must be conducted on an arm's length basis as if they were conducted with external parties. Any person who has an interest in such transactions must not participate in the consideration or approval process.
2. Avoid participating in negotiations or entering contracts on behalf of the Company with organizations in which the employee or their relatives have an interest.
3. Avoid accepting employment, providing consultancy services, serving as a director, or holding shares in other organizations, businesses, or legal entities outside the Company's group that may give rise to a conflict of interest with the Company, unless such activities do not affect the Company's interests and have been approved by the authorized person as specified by the Company.
4. In cases where transactions fall under related party transactions as defined by relevant regulatory authorities, such as the Securities and Exchange Commission (SEC) or the Stock Exchange of Thailand (SET), the Company must strictly comply with the prescribed rules, procedures, and disclosure requirements.

5.2 Private Business Operations Outside the Company

Employees at all levels are prohibited to engage in any private business in competing with the Company's business or to perform any work for partners, competitors, customers or potential customers of the Company in the future which results in direct and indirect benefits affecting decisions and performing duties for the Company.

5.3 Giving or Receiving Gifts and Entertainment

Employees at all levels must comply with the Company's policy regarding the giving and receiving of gifts, as detailed below:

- **Giving Gifts, Souvenirs, or Other Benefits**

1. Gifts or souvenirs can be given according to tradition without violating relevant laws and local customs. For example, in Thailand, the value should not exceed 3,000 baht per person per occasion, as announced by the NACC. Gifts should promote the company's image, such as calendars, diaries, or products used for public relations.
2. Employees may give gifts under the following conditions:
 - 1) The act is not intended to influence, persuade, or reward anyone in a way that seeks to gain an inappropriate advantage or is a blatant or covert exchange for assistance or benefits.
 - 2) The act is legal.
 - 3) Gifts must be given on behalf of the company, not in the name of the individual employee.
 - 4) Gifts cannot be in the form of cash or cash equivalents (e.g., gift cards or vouchers)
 - 5) Gifts should be appropriate to the situation, such as giving small gifts during the New Year festival.
 - 6) The type and value of gifts must be suitable. For example, employees should not give gifts or entertain a business partner who is organizing a bidding.
 - 7) Gifts must be given or received openly and not secretly.
3. Gifts and souvenirs should be given according to the same standards to avoid discrimination.
4. Employees must not give gifts, souvenirs, property, or other benefits to spouses, children, or relatives of government officials, customers, business partners, or contacts, as this is considered receiving on their behalf.
5. The giving of souvenirs on significant business occasions, such as company anniversaries or the signing of business agreements, is permitted. However, if the value of the souvenir exceeds Baht 3,000, the following procedures must be followed:
 - 1) Report on the matter immediately to the head of the department for consideration of the appropriateness and the value of the gift or souvenir.
 - 2) Complete a Gift Declaration Form for gifts exceeding the prescribed threshold, specifying the name of the giver, the estimated value, and the reason for receiving the gift.

- 3) Submit the document to the Compliance Section or the Administration Section for review and recording in the Company's gift register.
- 4) Obtain approval in accordance with the Company's established approval authority levels.

■ **Receiving Gifts, Souvenirs, or Other Benefits**

1. Company personnel must refrain from accepting gifts, souvenirs, or other benefits in all cases and should inform external parties of the policy against accepting such gifts.
2. In cases where it is necessary to receive gifts, souvenirs, or other benefits with a value exceeding Baht 3,000 and the items cannot be returned, the following procedures must be followed:
 - 1) Report on the matter immediately to the head of the department for consideration of the appropriateness and the value of the gift or souvenir.
 - 2) Complete a Gift Declaration Form for gifts exceeding the prescribed threshold, specifying the name of the giver, the estimated value, and the reason for receiving the gift.
 - 3) Submit the document to the Compliance Section or the Administration Section for review and recording in the Company's gift register.
 - 4) Consider appropriate options for handling the gift, such as transferring it to the Company for use in corporate social responsibility (CSR) activities or submitting it to the Administration Section for appropriate allocation for the Company's benefit.
 - 5) Obtain approval in accordance with the Company's established approval authority levels.
- 2.1 Consumer goods with an expiration date of less than one month may be managed at the discretion of the supervisor of the department receiving the gift
- 2.2 Calendars and diaries used as public relations media for the company may be accepted as personal gifts.
- 2.3 Gifts or souvenirs accepted in the name of the organization for the organization, such as during a contract signing, can be accepted. However, these items must remain the property of the company.

■ **Entertainment**

Expenses related to business entertainment, such as food and beverages, entertainment in the form of sporting activities, or other expenses directly related to business practices or customary business courtesies,

including activities for providing business knowledge or understanding, may be permitted. However, such expenses must be reasonable and must not influence decision-making in the course of duties or create a conflict of interest.

6. Anti-Corruption

The Company places great importance on conducting its business with transparency and in accordance with good corporate governance principles. The Company has zero tolerance for all forms of fraud and corruption. To promote honest and fair business practices, the Company has established an “Anti-Corruption Policy” to serve as a guideline for directors, executives, and employees at all levels. All personnel are required to strictly comply with the policy as a consistent standard across the organization.

Directors, executives, and employees shall not directly or indirectly support corruption, such as giving or accepting bribes or other incentives, or assigning others to give or accept bribes or other incentives on their behalf. The law stipulates that such acts are offenses and have criminal penalties, and the offenders may also be prosecuted, therefore the following acts are strictly prohibited.

- Payment or other benefits which are prohibited by the law or the Company’s regulations.
- Payment or other benefits for doing business with each other.
- Payment of other benefits to government officials or politicians in order to motivate a decision that is beneficial to the Company.
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7. Political Rights Exercise

The Company encourages directors, executives, and employees to exercise their rights as a good citizen in accordance with the law, politically neutral, and refrain from any action that may result in misunderstandings that the Company is involved in or supports any particular political party, at the local, regional, or national level. The practices are set out as follows:

1. Should exercise their rights as good citizens in accordance with the Constitution and other relevant laws.
2. Have the right to participate in political activities on their behalf outside of working hours and shall avoid any action that makes others misunderstand that it is an act on behalf of the Company.
3. Are prohibited from participating in any activity that may cause misunderstandings that the Company is involved in or supports any particular party or influential group.
4. Are prohibited from using Company property such as staff uniforms or other symbols that may be perceived as being employees of the Company when attending political meetings.
5. Shall avoid political expressions or opinions in the workplace or in working hours that may lead to conflicts in the workplace.

8. Anti-Money Laundering

The Company adheres to the rules and laws regarding anti-money laundering and anti-terrorist financing in order to prevent directors, executives, and employees from committing money laundering, terrorism or other financial crimes. The Company has specified the following practices:

1. Before any transaction with a contract party, legality of the source of the money should be ensured.
2. Do not transfer any amount to an unknown account or accept money transfers from unusual payment.
3. In case of any unusual transaction is found, it shall be immediately reported to the superior.

9. Compliance with Code of Conduct

Directors, executives, and employees of the Company are required to acknowledge, understand, and strictly comply with the policies and guidelines specified in this "Code of Conduct" guide, which is not voluntary and the employees can't defend their actions by claiming they didn't know the practices.

The Company has established guidelines for enhancing and supporting to the compliance the Code of Conduct as follows:

1. Prepare and distribute the written "Code of Conduct" guide throughout the Company for executives and employees of all levels to study and understand, then sign and acknowledge this Code of Ethics and adhere to the operational guidelines.
2. Executives at all levels of the Company shall be responsible for and shall attaches importance to making the subordinates aware, understand and strictly comply with this "Code of Conduct" guide.
3. Instill value and create a corporate culture to promote ethical value, including
 - Directors and senior management of the Company behave as role models for morality and ethics.
 - Enhance knowledge and understanding about the importance of morality and ethics through activities, such as creating and publicizing learning packages, training on knowledge of morality and ethics, etc.
4. Establish the implementation guidelines for dealing with business ethical issues, including complaints, investigations, protection of complainants and penalties.
5. Establish an annual audit process, internal control assessment and "Code of Conduct" guide compliance assessment to ensure that the Company maintains sufficient and appropriate adherence to this guide.

10. Handling Business Ethical Complaints

The Company has assigned the Human Resources Department to be responsible for handling business ethical complaints, where employees can send complaints directly to the following addresses.

Mail:

Complaint Handling Unit, Human Resources and Administration Department
Advanced Information Technology Public Company Limited
37/2 Sutthisan Winitchai Road, Samsen Nok Sub-district,
Huai Khwang District, Bangkok 10320

E-mail: hr@ait.co.th

Telephone:

+66 2 275 9400 ext. 3101 Secretary of the Anti-Corruption Working Group

Employees may also submit complaints through the channels and procedures specified in the Company's "Whistleblowing Policy".

11. Penalties

This Code of Ethics is established for all employees to adhere to. Any person who neglects or violates these ethical principles may be subject to disciplinary action in accordance with the Company's work regulations regarding disciplinary rules and disciplinary measures.

Suggestions

As there is no etiquette guide to explain the behavior that should be done or omitted in all situations, and the etiquette guide has no purpose to go into that detail. Therefore, the Company relies on the discretion of the directors, executives and all employees in contemplating what should be done or refrain in situations that they face.

If you have any questions or concerns about your own discretion whether you should take any action or not, the Company has some basic suggestions that we should ask the following questions to support our own discretion.

- Are your actions lawful or not? Is it in line with the Company's regulations?
- Do you "feel" that your actions are appropriate? Do you think you can explain the reason to other employees in the Company or the regulatory authority to accept your actions?
- Can you explain your actions to the public if your actions appear in the newspaper?