ASSETWISE

Code of Conduct

AssetWise Public Company Limited

Message from the Chairman

AssetWise Public Company Limited and its subsidiaries ("Company") are committed to conducting business on the basis of legitimacy, accountability, transparency, integrity, and responsibility to all stakeholders. This is to ensure that all the Company's businesses are operated with efficiency, credibility, and an ability to create value for all stakeholders.

The Company has instituted this Code of Conduct, which is clearly divided into categories and covers all important practices, in accordance with the development of its good corporate governance. These are to be guidelines for the directors, executives, and employees of the Company, for them to understand, apply, and strictly adhere to such guidelines in all their lines of work and business operations. This is to ensure that the Company maintains transparent business practices, complies with the law, and avoids activities that may lead to conflicts of interest with the Company's business. It is also to build investors and stakeholders' confidence in the Company through its adherence to good quality, good culture, good self-image, and good standards which will lead the Company to continue its journey as an organization of excellence.

- Sarawut Charuchinda -

Chairman of the Board

AssetWise Public Company Limited

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Definitions

Code of Conduct	means	good business practice guidelines
Company	means	AssetWise Public Company Limited, including its subsidiaries, associates, and other companies that the Company has administrative authority over, as well as its business representatives.
Directors	means	company directors.
Executives	means	Chief Executive Officer and department managers.
Staff	means	employees, from assistant managers or equivalent to regular employees, temporary workers or employees under special contracts.
Asset	means	assets, including chattels, real estates, technology, copyrights, licenses, patents, and inventions of the company.
Company's information	means	information owned or controlled by the Company which has economic value both now and in the future.
Stakeholders	means	Individuals and/or legal entities involved in the Company's business operations including shareholders, employees, business partners, competitors, customers, and creditors, as well as the community and society.
Conflict of interest	means	any activities that may have connections with personal needs or needs of associated persons whether by blood or any other way that may influence decisions, obstruct, or hinder the Company's best interests.
Confidential information	means	Non-public information or information that, if disclosed to the public or in the hands of a competitor, will have serious consequences for the Company. This includes all types of information provided to the Company by partners and customers.
Corruption	means	Abuse of authority to obtain undesirable benefits, giving or receiving bribes - be it in any form of offering, agreeing, giving, promising, and requesting of money, property, position, and power, or misusing current property with government officials, government agency, private agency, or those who have authority, either directly or indirectly, for the said person to act or to refrain from acts in order to obtain or maintain the benefit of oneself, family, acquaintances or others concerned with an exception of cases accepted by laws, regulations, announcements, restrictions, local traditions, or trade traditions.

Introduction

Vision

"We strive to become the leading real estate company in Thailand."

Mission

"We aspire to design and create living spaces that suit the needs of customers while pursuing quality and service excellence to contribute to the well-being of individuals and society as a whole."

Core Value

"H E A R T"

- **Happiness** — Create happiness for oneself and pass happiness to colleagues, customers, and people in society.
- **Ethics** — Be a person of integrity who consistently upholds, behaves, and acts on good morality and good ethics.
- **Always Learning** — Keep learning and seeking new knowledge, as well as review, practice, and improve continuously.
- **Responsibility** — Be responsible for work, colleagues, organization, customers, and society.
- **Team Work** — Promote cooperation in work, pay attention, and listen to the opinions of colleagues to strive to create the power of collaboration.

CODE OF CONDUCT

1. Compliance with laws and company regulations

The Company is required to comply with the laws and regulations of government as well as the Company's regulations and to avoid any involvement in unlawful activities, or other activities that are in contrary to public order and morals. Use of employees or the Company's assets for illegal purposes are strictly forbidden.

1.1 Laws and regulations of the Company must be complied with accurately and completely.

1.2 Violation of the law, shareholders' resolutions, directors' resolutions, restriction, regulations, or orders of the Company, claiming that it is an action to increase the profit of the Company or any other reason, is not an acceptable cause.

1.3 The Company must conduct business with honesty, taking into account the legitimate interests of the Company despite gaps in the law, restrictions, regulations, or orders.

2. Best practice on shareholders

The Company strives to be a good representative of its shareholders, understanding that the shareholders are the owners of the business. Therefore, in doing business, the Company strives to create maximum satisfaction for the shareholders, taking into account the growth of the Company based on integrity and good ethics through these following guidelines;

2.1 Perform duties with integrity and decide any action with caution, prudence, equality, and fairness to both major and minor shareholders for the best interests of the shareholders as a whole.

2.2 Abide by the laws, the Company's regulations, policies, and resolutions approved by general shareholders' meetings, and adhere to the good corporate governance principles.

2.3 Report data, news, information, and the status of the Company to all shareholders regularly, equally, and completely in accordance with the truth about the Company, both the positive and the negative, in a timely manner adequate for all shareholders to make decisions equally.

2.4 Ensure the Company's operations achieve both short-term and long-term objectives with efficiency, effectiveness, and competitiveness.

2.5 Ensure that directors, executives, and employees do not seek interests for personal, families' or close acquaintance's benefits from any non-public information of the Company by disclosing it to third parties and/or do not take action in any manner that may create a conflict of interest with the Company.

2.6 Ensure that the assets of the Company are not wrongly depreciated or lost.

3. Best practice on customers

The Company is dedicated to ensuring customers' satisfaction and confidence, factors which impact the success of the business. Therefore, the Company always strives to find ways to meet the needs of its customers effectively and efficiently, including establishing an after-sales customer care management system to maintain a good long-term relationship. The guidelines for such conduct have been established as follows;

3.1 Deliver quality products and services that meet or exceed customer expectations for a fair price. Such products and services must be safe, with no harmful effects to the health of the customer, and trustworthy. There must be no limit on any customer's right to access the Company's products and services and they all shall be offered with fair trade conditions.

3.2 Provide accurate, sufficient, and timely information, and communicate product or service details to customers clearly, correctly, and truthfully. Ensure that important details regarding the quality, quantity, or any conditions of the products or services are not misleading or distorted, so as to prevent customer misunderstanding.

3.3 Contact customers with a polite, efficient, and trustworthy manner. Responses to customer needs should be made promptly to ensure the customers' highest level of satisfaction.

3.4 Provide customer confidentiality measures in accordance with the Personal Data Protection Act and other applicable laws. These measures ensure that customer information or confidential data is not used for personal benefit or by any unauthorized parties. Customer information will not be disclosed without prior permission from the customer or from an authorized person within the Company, except for information that must be disclosed to relevant third parties for clarification or legal action. The Company shall also provide channels and procedures for handling customer complaints related to personal data.

3.5 Prepare documents to introduce the service team to customers after the ownership transfer, including following up and asking about customer satisfaction, and strengthening relationships with residents, as well as supporting the implementation of social and environmental responsibility for customers.

3.6 Provide a channel for customers to provide suggestions, file complaints, or make grievances for problems related to the Company or seek assistance and advice for the Company's related issues.

4. Best practice on employees

Employees are the most valuable resource of the Company and the key to success. The Company aims to develop and encourage a good corporate culture and work environment as well as promote teamwork, unity, and fair treatment of employees on the basis of morality. In addition, the Company places great importance on safety, sanitation, and environment in the work of employees through clearly and concretely stipulated guidelines as follows;

4.1 Treat all employees with courtesy and respect their dignity, honor, individuality, and human rights.

4.2 Protect personal information of employees by limiting the disclosure and use of personal information of employees. Information such as family history, salaries, assessment results, and medical records are to be provided to relevant persons in the Company only as necessary. Employees' personal information will not be disclosed to third parties without permission from the employee, except for information that is required to be disclosed to relevant third parties for clarification or legal action.

4.3 Provide equal opportunities for hiring, appointments, and transfers. Awarding or consideration of merit and punishment for employees is done with honesty and based on the knowledge, capability, and suitability of the employees, as well as the Company's regulations regardless of gender, nationality, race, religion, or belief.

4.4 Pay compensation to employees fairly and at a higher rate than required by law, both in the short and long term by considering the performance of the Company together with the performance of the employees. The Company will manage wages, salaries, and benefits to motivate and retain knowledgeable and capable personnel with the Company.

4.5 Maintain a working environment that is safe for employees' lives and properties at all times. Ensure good hygiene in the workplace and provision of welfare and employee benefits such as provident funds, medical treatment, annual health check, marriage allowance, funeral allowance, accident insurance, health insurance, etc., and communicate for employees to use welfare continually in order to maintain a good quality of life for all employees.

4.6 Place importance on building and developing of skills and potential to prepare employees for career growth by giving employees the opportunity to have thorough and consistent learning.

4.7 Strictly adhere to laws and regulations related to employees and avoid any unfair action or causing a negative impact on employees.

4.8 Create and promote a good mindset among employees, for them to share, to give, and to respect each other's opinions, as well as to be good citizens of society.

4.9 Establish a policy on safety, hygiene, and working environment of employees and always supervise employees to strictly abide by the following safety policies:

- 4.9.1 Support the Company's activities to be in conjunction with the law, regulations, and other relevant safety requirements.
- 4.9.2 Ensure that occupational safety is the first priority of all employees.
- 4.9.3 The supervisors at all levels are required to act as a good role model, who lead, train, and motivate employees to work with safety.
- 4.9.4 All employees are required to always consider the safety of themselves and their colleagues, as well as the Company's assets during their working time.
- 4.9.5 All employees are required to always maintain cleanliness and tidiness in the area of their work.
- 4.9.6 The Company strives to support safety activities that stimulate and develop employees' consciousness to ensure workplace safety.
- 4.9.7 The Company strives to continuously review, improve, and develop the safety management system.

4.10 A Welfare Committee elected by employees is established to monitor and represent the employee body in negotiating benefits with the Company.

5. Best practice on creditors

The Company has a policy on responsibility and fair treatment for creditors by taking into account the best interests of the Company on the basis of fairness, while avoiding situations that may cause conflicts of interest. This includes adherence to an agreement or contract and provision of accurate information in order to achieve fairness for both the Company and creditors. Therefore, guidelines have been established as follows;

5.1 Use loans approved by creditors or financial institutions for the purposes of the Company as specified on the intention to creditors or financial institutions.

5.2 Repay the debts to creditors on time according to the specified conditions. Strictly follow the conditions set by creditors or financial institutions and maintain the quality of assets as collateral to meet the creditors' requirements.

5.3 When there is a significant event that may significantly affect financial status and/or the debt repayment, the Company will notify creditors in order to jointly find ways to prevent or mitigate damage.

6. Best practice on business partners and contractors

The Company has a policy to treat all trade partners equally and fairly. Proceeding of any action must take into account reputation, legality, important regulations, and traditions, as well as abide by the commitments with trading partners, and consideration of equality in business operations and mutual benefits with trade partners. Therefore, guidelines have been established as follows;

6.1 Establish transparent and fair criteria for selecting customers, taking into consideration the partner's potential for sustainable business operations, the ability to deliver quality products in accordance with standards and within the specified time frame, and the avoidance of labor law violations and human rights infringements.

6.2 The Company treats its customers equally under the same terms and conditions in order to be fair to all.

6.3 Provide opportunities for new partners to encourage development of new skills and technology. There is a process for selecting business partners that is fair, transparent and can be audited.

6.4 Provide truthful information and accurate reports to trading partners.

6.5 Do not ask, receive, or pay any benefits that are dishonest in trade with partners. To prevent unfair operations, the Company prohibits accepting assets or any other benefits from trading partners or other persons with duties or businesses related to the Company. If it is a gift due to normal customs, such as the New Year, such gift shall be sent to the Human Resources Department for further general benefits.

6.6 Encourage business partners of the Company to cooperate in the prevention and opposition of corruption by not giving bribes of any kind to government officials or employees of the Company for them to facilitate incorrect operation in all cases.

6.7 Strictly comply with the agreed contracts or conditions. In the event that some conditions cannot be met, the business partner must be notified immediately to jointly consider solutions based on business relationships.

6.8 Payments of goods and wages must be on a clear and punctual schedule.

6.9 Supervise and assist trade partners to conduct their business in parallel with the Company's business without taking advantage of trade.

6.10 Provide channels for trade partners to file complaints about being bullied or unjust treatment. Such complaints can be made the Chief Executive Officer, Chairman of the Audit Committee, and the Head of Internal Audit.

6.11 Provide trade partners' confidentiality measures to ensure no information or confidential data of the trade partners are used for personal benefits or by wrongful parties without receiving permission to disclose such information from the partner or the authorized person of the Company, except for information that must be disclosed to relevant third parties for clarification or legal action.

6.12 Actively promote and support the enhancement of its partners' capabilities and business potential through collaboration in the development of product and service quality, the advancement of innovations for the mutual benefit of both the Company and its partners, and the provision of training programs and seminars to strengthen partners' professional knowledge. These initiatives are intended to enable partners to conduct their businesses in a sustainable manner in alignment with the Company's long-term objectives.

7. Best practice on competitors

The Company has a policy to treat its competitors by focusing on fair and transparent business operations according to the principles of competitive governance in accordance with the law, trade tradition, and good practice guidelines, as well as international principles under the legal framework on the principles of trade competition. Therefore, guidelines have been established as follows;

7.1 Behave within generally accepted rules of competition.

7.2 Support and promote free, fair, and non-monopoly-based trade, and do not require trade partners to trade only with the Company.

7.3 Do not violate secrets or seek competitors' trade secrets in dishonest, illegal, or unethical methods.

7.4 Do not destroy the reputation of competitors by making malicious comments. There shall never be a competition in a business by slandering, bullying, or distorting the facts of a competitor.

7.5 Do not participate in a commercial contract or take any implied action that may cause unfair competition or a trade monopoly.

8. Best practice on community, society, and environment

The Company realizes that as a part of society, it has a responsibility to help society, support community activities, and to improve the quality of life and community economy. The Company believes that for it to continue to survive, develop, and grow sustainably in society, in addition to having to offer quality products and honesty in their business, the Company must be responsible for the betterment of society as a whole. Therefore, guidelines have been established as follows;

8.1 Adhere to these guidelines as a commitment in business operation with due regard for the benefits and sustainability of the community and society, as well as responsibility for the environment.

8.2 Institute a policy to conduct business with regard to the community, society and environment, by stipulating that the operations related to the Company's business operations must not be lower than the statutory criteria and must be in accordance with the law governing the real estate development business as well as environmental requirements and standards. To prevent and reduce the impact that will happen to the community, society and environment.

8.3 Continuously promote awareness and understanding as well as communicate and educate employees of the Company at all levels on social and environmental responsibility.

8.4 Survey and understand relevant regulations and laws in order to prevent the Company's business operations from affecting the way of society or local communities, while respecting customs, traditions, and culture of each locality in which the Company operates.

8.5 Be able to adapt under various changes and respond quickly and efficiently to events with impact on the environment, community, life, and property as a result from the operation of the Company, as well as cooperate fully with government officials and related agencies.

8.6 Conduct activities to contribute to society, community, and environment on a regular basis for a better quality of life of the communities in which the Company is located or has business. Such activities can be privately operated by the Company and through collaborations with government, private sectors, and local communities.

8.7 Operate in accordance with safety standards and in accordance with the standard regulations required by law.

8.8 Support and promote the cost-effective use of resources and energy and improve the quality of human life by managing environmental problems. Preservation of the environment is considered as everyone's mutual responsibility.

8.9 Develop projects that can create tangible benefits for the community, then monitor and measure their long-term progress.

9. Insider dealing and confidentiality

Confidential or inside information includes important information of the Company that has not been disclosed to the public. If such information is disclosed inappropriately to the public, it will have serious consequences for the Company. The Company has a duty to maintain and hold such information in confidentiality that is only known to those as necessary. Therefore, guidelines have been established as follows;

9.1 The Company has set levels of confidentiality of information and confidentiality practices. Access to important documents and confidential information are maintained with a specific method defined for each level or type of information.

9.2 Executives and employees must not disclose inside information that they have learned from their performance to others. They must not wrongfully use the information for personal or others' benefit, whether directly or indirectly, and whether or not it will be rewarded.

9.3 Disclosure of confidential or inside information must be made by the Company's authorized personnel only. Those who do not have a duty to disclose information must not disclose such information even

when asked and advise the inquirer to ask questions from persons with disclosure duty only. This is to ensure that the published information is accurate and in the same direction.

9.4 The Company has a policy to keep information on the executives, employees, business partners, customers, and trade information confidential. However, it is mandatory by law to disclose information for the purpose of prosecution or for when the Board of Directors approves disclosure.

9.5 In hiring a person who has worked for a competitor or the government, the Company must find and study previous confidential agreements made by that individual with a competitor or the government prior to their work with the Company. The Company must not do anything to make that person act in breach of an agreement with a competitor or the government which may cause legal proceedings to follow.

10. Internal control and internal audit

The Company has a good internal audit system and an appropriate level of risk management supervised by the Audit Committee. The Company has an Internal Audit unit that serves to achieve efficiency, as well as executives and employees that pay close attention to corporate governance and internal audit, as ensured with these following guidelines;

10.1 The Company has set up a system of supervision and internal audit in order to have a well-controlled environment for the Company's employees to have a positive attitude towards internal control.

10.2 The Company designates appropriate risk assessment measures to evaluate risks and supervise compliance with the principles of good corporate governance that may affect the objectives, goals, effectiveness, efficiency, success of the work, accuracy of financial reports, and compliance with any laws, rules, regulations, or orders – for all operations to be well-controlled in all functions. There is also an appropriate monitoring and evaluation system to ensure its suitability, practicality, and effectiveness, as well as appropriate improvement to be more suitable with situations at least once a year.

10.3 The Company must arrange an independent agency responsible directly to the Audit Committee whose roles and duties are clearly defined in writing. Their roles are to perform the duties of internal auditing efficiently, using sufficient personnel with knowledge and competence, and adhering to the ethics of internal auditors.

10.4 The Audit Committee must review to ensure that there is an adequate internal control system and internal audit and report the results to the Board of Directors for acknowledgment.

10.5 Executives and employees are responsible for cooperating and supporting the work of the internal audit function.

11. Non-infringement of intellectual property

The Company has a clear policy not to take any action that would violate intellectual property, whether it is in copyright, patent or trademark. The Company has stipulated clear guidelines, for instance, to prevent copyright infringement. The Company has instituted a policy which supervises the information technology systems of the Company and its subsidiaries. Such policy is used to monitor of the use of various programs in the work of employees to prevent the use of pirated or non-work related software, etc., as shown in the following policies;

11.1 The Company supports and encourages employees to use their research and development knowledge to invent new tools, equipment, and innovations which are up-to-date, in accordance with international standards, and practical without infringing on the intellectual property of others.

11.2 The Company ensures that all employees are informed of this policy from the beginning of employment.

11.3 The Company monitors software and hardware used as tools or equipment for work to prevent the use of software programs and/or hardware that is pirated or unrelated to work.

11.4 The Company educates employees to be aware of using the internet only to search for information or knowledge that is beneficial to their work, and avoid websites that are illegal, untraditional, or unethical.

11.5 The Company encourages employees to strictly adhere to and comply with the policy of non-infringement of intellectual property and copyright infringement set by the Company.

12. Non-violation of human rights

The Company understands the importance of respect for human rights, value of human dignity, and the basic rights of individuals. The Company is committed to treating everyone with equality and fairness, requiring its employees to treat each other with respect. Furthermore, the Company also places importance in its workforce, by practicing hiring processes with equality and fairness in the recruiting process, compensation payment, performance appraisals, etc. without discrimination. In addition, the Company also promotes and supports human rights and will not participate in any action in contrary to human rights principles. No forced labor in any form, including the use of labor from human trafficking or illegal child labor is used in the Company's operations.

The Company organizes an evaluation for the impact its operation has on human rights violations, put forth preventive measures, and tracks the results to make sure its operation does not commit any violation.

In addition, the Company had set up a channel for employees or anyone affected to file complaints for any human rights violation they witnessed. The complaints will be investigated by the Company, and if proven true, there will be punishment for employees involved according to Company's regulations and appropriate remedy for the victims. Consequently, the Company will set up measures to prevent the violation from repeating and protect the persons who filed complaints according to the Company's policies.

13. Anti-Corruption

The Company is well aware that bribery and corruption are serious threats that can cause damage to the economic and social development, and they are obstacles to the sustainable growth of the Company. Therefore, the Company has established and announced a separate policy on anti-corruption and bribery to define details on anti-corruption policy and its measures with its key points are as follows;

"It is forbidden for the directors, executives, and employees of the Company to accept all forms of corruption in dealing with government agencies and private agencies or individuals with related duties both directly and indirectly in order to unethically acquire the Company's business benefits or personal benefits. This includes practices such as making a guarantee of giving or accepting items, gifts, entertainment, solicited money, donations, and any other benefits from people doing business, etc.

The Anti-corruption Policy includes business partners, customers, and stakeholders of the Company, both in domestic and international. The Company also audits the compliance and implementation of the Anti-corruption Policy by organizing a knowledge test in matters relating to the implementation of anti-corruption and bribery policies annually To assess employees' understanding of compliance with anti-corruption and bribery policies and conducts a risk assessment on corruption to formulate guidelines and plans to prevent corruption risks as well as follow up on the performance according to the corruption risk management plan and bribery, as well as provides training to educate employees about the Company's anti-corruption policy and practices at least once a year."

14. Innovation development

The Company supports innovation that creates business value as well as value to customers, stakeholders, society, and environment. The following methods are used to encourage innovation within the company:

14.1 Organize activities that allow employees to brainstorm for innovative ideas that add value to the business operation and its products, and apply the innovation to the Company

14.2 Search for innovation or appropriate technology to help manage business Conduct operations or can be applied to the Company's real estate development projects

14.3 Supports employee education on innovation and new technology for their respective functions and the company's business

14.4 Corporate with business partners and alliances to search for and create innovation to be used in the Company's business, products, and services

15 Information Systems Security

The Company places great importance on the security of its information technology systems to ensure the safety and integrity of data stored within these systems in accordance with international standards. The Company aims to minimize risks associated with potential threats to the information technology systems and reduce the impact of any security breaches. Additionally, the Company seeks to maintain the security of its information technology systems during emergencies or disasters that may affect the organization. Accordingly, the Company has established the following guidelines for implementation.

15.1 Critical organizational data must be protected from unauthorized access.

15.2 There shall be controls in place for external contractors who engage in projects requiring access to the Company's information technology systems.

15.3 Critical organizational data must be appropriately kept confidential.

15.4 Critical organizational data must be accurate, complete, and intact.

15.5 Critical organizational data must always be available for use.

15.6 Applicable laws, regulations, and related requirements must be fully complied with.

15.7 Employees involved in these processes shall receive training on information security.

15.8 A Personal Data Protection Management system must be in place in accordance with the Personal Data Protection Act (PDPA).

15.9 A risk management system related to information security must be established within the organization.

15.10 A business continuity process during emergencies or disasters must be defined, considering the importance of continuous operations and an acceptable level of information security comparable to normal operations, including proper maintenance and testing of plans.

15.11 Information security policies and related supporting documents must be in place to define procedures, as well as guidelines for secure data usage and operation.

15.12 A process for reporting, investigating, handling, and managing security breaches appropriately must be in place, including abnormal activities and suspicious events.

Code of Directors, Executive Officers and Employees

To comply with the Company's philosophy and business ethics, the Company has therefore stipulated the Code of Conduct for directors, executives, and employees to use in their work. Adhering to virtue, honesty, and integrity, the Code of Conduct include practices as follows;

Best practice for each individual

1. Strictly respect and comply with the law, rules, and regulations of the Company.
2. Work with care, honesty, prudence, fairness, integrity, and independence from prejudice, and do not use one's own position for any wrongful benefit.
3. Have a sense of duty and responsibility for the performance of duties to be trusted and accepted by the society.
4. Perform the assigned work with full knowledge and capability.
5. Use the right to express opinions politely and appropriately.
6. Use polite verbal and physical manners and do no activities that may be disrespectful to supervisors or colleagues.
7. Develop oneself to have morality, ethics, as well as further study in order to perform duties efficiently.

Best practice for the Company

1. Performance

To ensure that directors, executives, and employees perform under the Code of Conduct, the following guidelines are stipulated;

1.1 Must perform the assigned work with full knowledge, ability, and a sense of duty to be responsible for the results of their performance.

1.2 Must not violate, circumvent, or ignore the regulations, announcements, or orders of the Company as well as lawful orders and duties of supervisors.

1.3 Must not operate any business and/or activities that may lead the general public viewing it as a business or activity that has a conflict of interest with the Company either directly or indirectly.

1.4 The Company must strictly store and categorize information in accordance with the Company's regulations.

1.5 The information of the Company must not be disclosed to any person without the right to know according to regulations or business agreements, unless approved in writing from the authority and the responsible body.

1.6 The Company's information must not be used for securities trading or to send such information to others for securities trading.

1.7 Must not manufacture or possess illegal items whether for one's own use, distribution, or for any other person.

1.8 Must use communication and computer systems responsibly and must not use them to cause disunity, harm, demoralization, or hostility in the workplace.

1.9 Must not use communication and computer systems in any activity that is illegal or contrary to the Company's policies. Must not use the Internet or similar services in a way that would damage the reputation and the credibility of the Company.

1.10 Must comply with the Company's requirements for safety, equipment usage, and work environment.

1.11 Must not intentionally make false records or reports and must not intentionally conceal information or present false or incorrect information to the Company. Inaccurate reports or records, once found, must be reported to the supervisor immediately.

1.12 Must use time to work effectively and efficiently as required by the Company's regulations. This includes not acting or persuading colleagues and subordinates to spend time working for other activities that are not related to the interests of the Company or shareholders.

1.13 When encountering an event of fraud, misconduct, corruption, or an event that may cause damage to the organization, it must be reported immediately via the complaint and suggestion reporting channels set by the Company.

2. Preservation of property

Directors, executives, and all employees have duties and responsibilities in the care and use of the properties for the maximum benefit of the Company. The Company's properties, including tangible assets and intellectual properties, must not be used for personal or others' benefits, as shown in guidelines as follow;

2.1 The Company's assets must not be used, sold, loaned, or transferred without permission regardless of the condition that the assets are in.

2.2 Must not intend to damage, sabotage, or destroy the Company's assets.

2.3 The Company assets must not be used for personal gain or outside business unless permitted by the supervisors.

2.4 Must assist or endeavor to acquire patents, copyrights, or protection of trademarks which are the Company's intellectual property to prevent such information's leakage. Must not bring any kind of intellectual property of the Company to be used for personal or others' benefits without permission.

2.5 All employees must honor and respect the intellectual property of others and must not use the intellectual property of others, either as a part or as a whole, without permission from the owner of the work.

3. Defense of interests

3.1 Protection of customers and the Company's information

Directors, executives, and all employees must not disclose information of customers or the Company without the consent of the customers or the Company's authorized persons, except for disclosure of information to relevant third parties in accordance with the requirements of the law, which must also be authorized by the authorized person of the Company.

3.2 Competing business with the Company

Directors, executives, and employees shall not engage in the operation or take part in any business in competition with the Company's business.

3.3 Trading of Company Securities

Directors, executives, and employees have the right to freely trade in the Company's securities. However, the directors and executives must prepare reports of such trades and submit them to the Securities and Exchange Commission (SEC) within a specified period. Directors, executives, and employees must be prudent in using the Company's information to take advantage in trading of the Company's securities and are prohibited to trade in the Company's securities during the period of one month prior to the public disclosure of financial statements and within 24 hours after the said disclosure of information.

4. Conflicts of Interest

The Board of Directors has established a policy that prohibits directors, executives, and employees from taking advantage of being a director, executive, or employee of the Company to seek personal, family's, or close acquaintance's benefits, whether it is monetary or non-monetary. Any transactions that are connected with oneself must be avoided unless necessary, for the benefit of the Company, under the guidelines and regulations set by the Stock Exchange of Thailand. The guidelines for the directors, executives, and employees of the Company are defined as follows:

4.1 Receiving money or benefits, or financial involvement with business partners of the Company

4.1.1 Directors, executives, and employees at all levels must not accept money or any other benefits personally from the Company's customers, partners, or any person due to work on behalf of the Company. Directors, executives, and employees must not have financial involvement, such as being in a joint venture with or selling to the Company's customers, contractors, vendors of goods or services, or any other person doing business with the Company.

4.1.2 Directors, executives, and employees at all levels must not borrow or collect money from customers, or those doing business with the Company, except for borrowing from the bank or a financial institution as their own customer.

4.1.3 Directors, executives, and employees at all levels must avoid doing any connected transactions with themselves unless it is necessary for the benefit of the Company and under the rules and regulations of the Securities Exchange Commission (SEC) and the Stock Exchange of Thailand (SET), such as disclosure of name and relationship with their connected persons and compliance with the Pricing and Transaction Policy. Nonetheless, such transactions must be approved by the Board of Directors before being processed. Any connected transactions in the form of financial assistance, such as lending or credit guarantees, for other companies that are not the Company's subsidiaries must be avoided.

4.2 Involvement in external work or business

4.2.1 Directors, executives, and employees must be willing to perform their duties fully. In the event that directors, executives, and employees have work other than that of the Company, prior consent of the supervisor must be obtained and such work must not cause any impact on their duties or the Company.

4.2.2 Any private business operation by directors, executives, and employees must not affect the performance of duties and working hours of the Company. Participation in any business with the Company under their own name, family's name, or any other legal entity in which they have an interest, or any other business in competition with the business of the Company must be disclosed in accordance with the criteria set by the Company.

4.2.3 Directors, executives, and employees are prohibited from operating a business or participating in any business in competition with the business of the Company, regardless of the said directors, executives, or employees that will benefit directly or indirectly from such operations.

4.3 Use of company information for profit and trading in the Company's securities

4.3.1 Directors, executives, and employees must not use any inside information of the Company that has been disclosed to the public for personal or others' benefits, whether or not the Company may not lose any benefits from such action - such as buying land or investing in a business near the area where the Company will invest in a way that implies that it will benefit oneself or others.

4.3.2 Directors, executives, and employees in the departments with access or responsibility to internal information of the Company shall not trade in the Company's securities during the period of 1 month prior to the disclosure of the financial statements or any other inside information to the public and within 24 hours after such disclosure in order to avoid the occurrence of insider trading by the said persons.

4.3.3 In the trading of securities of the Company, directors, executives, as well as their spouses or those who live together as husband or wife, underage children, and related persons in accordance with the Securities and Exchange Act BE 2535 (amended BE 2559), Must notify the Board of Directors or the person assigned by the Board at least 1 day in advance of every trading and security holding reports of such persons must be prepared and disclosed. Every time there is a change in securities holding, when there is a purchase, sale, transfer, or receipt of securities, a report must be made and submitted within three days from the date of purchase, sale, or, transfer to the Securities and Exchange Commission (SEC) and report such changes to the Board of Directors' meeting every time.

4.4 Accepting or giving of business gifts and entertainment

4.4.1 Directors, executives, and employees must abstain from receiving or giving gifts either in form of money, property, or any other benefits from all stakeholders related to the Company's business operations.

4.4.2 Directors, executives, and employees must not accept or provide property, services, or entertainment that may influence or affect decision making in any direction which may lead to unrighteous duties. Directors, executives, and employees may provide or receive entertainment only for the benefit of the Company's business and only when it is not in a manner that exceeds the normal relationship with partners or other persons involved with the Company, or not in order to gain any unlawful advantage, assistance, and benefits.

4.4.3 Avoid and be careful when giving gifts to supervisors or receiving gifts from subordinates. Such giving and receiving must not unfairly incentivize any decision.

4.4.5 In the event that one is unable to avoid receiving items or any other benefits, or in a situation where they cannot refuse acceptance of such item or benefit, the Company assigns executives, at the levels of department managers and above, to be the recipient of such item or benefit and only if its value does not exceed 3,000 Baht. The Company has also stipulated guidelines for receiving or giving items in the Anti-corruption Policy.

The Board of Directors has instituted guidelines for directors, executives, and relevant persons to disclose personal and related interest information to the Board of Directors. Such interest information must be sent at least once annually to the Company Secretary within 7 business days from the end of the year to reporting to the President and Chairman of the Audit Committee within 7 business days. This is to provide the Company with adequate information for implementation on the requirements concerning connected transactions that may cause a conflict of interest and may lead to transfer of benefit of the Company and its subsidiaries. It is also used to prevent directors, executives, and related persons from participating in the decision-making process of transactions between the Company and stakeholders or those who are involved. In the event that there is a change in the information in the report of interest of directors and executives, the Board of Directors requires that the directors and executive submit a revised version of the interest report form to the Company Secretary within 3 business days from the date of the change. The Company Secretary must send an amended version of the report to the Chairman of the Board and Chairman of the Internal Audit Committee within 7 business days from the date of the report submission to the Company.

5. Reputation Protection

5.1 Fairness to business stakeholders

Directors, executives, and employees must treat all stakeholders fairly. This includes treating customers, business partners, competitors, shareholders, and the general public without taking advantage and with fairness, honesty, and transparency.

5.2 Compliance with laws, rules and regulations

Directors, executives, and employees must conduct themselves within the framework of the laws and regulations without taking any action that infringes or defers of such laws and regulations which may cause damage to themselves and the Company.

5.3 Providing information to the public

Provision any information about the Company must be based on true, accurate, complete, and practical information data, and must be made at an appropriate time. The Chief Executive Officer is directly responsible for considering and assigning executives or employees to provide information or

interviews to the public as appropriate. Therefore, unassigned executives or employees are not allowed to provide information or interviews with the public.

6. Political action

The Company has a policy to conduct business with political neutrality. It does not support or provide financial assistance, resources, or any property of the Company, whether directly or indirectly, to any politician, political party or any political movement for the benefit of such groups of people.

Nonetheless, the Company encourages directors, executives, and employees to exert the right to participate in political activities under the provisions of the Constitution, laws, and relevant regulations. However, they must avoid any activities that may lead to the understanding that the Company is involved or provides support to politicians, political parties, or any political movements.

Complaints and whistleblowing

The Company has a policy for receiving complaints and whistleblowing as a channel for all directors, executives, and employees in the Company, as well as stakeholders to make complaints or whistleblowing of fraud, misconduct, or any action that does not comply with the law or the Company's rules, regulations, and good ethics. The whistleblowing channels are as follows;

1.1.1 Complaint box

1.1.2 A sealed letter to the authorized recipient of complaints, namely the Chairman of the Audit Committee or the Chief Executive Officer or the Head of Internal Audit, addressed as follows:

To: The Chairman of the Audit Committee or the Chief Executive Officer or the Head of Internal Audit, AssetWise Public Company Limited
No. 9, Soi Ramintra 5, Yaek 26, Anusawari Subdistrict, Bang Khen District, Bangkok 10220

1.1.3 An email to the Corporate Governance Division at CG@assetwise.co.th or an email to the authorized recipient of complaints:

- Chairman of the Audit Committee : kriengkrai.cg@assetwise.co.th
- Chief Executive Officer : kromchet.cg@assetwise.co.th
- Head of Internal Audit : ia@assetwise.co.th

Whistleblowers should report relevant facts or demonstrate that they have reasonable grounds to suspect misconduct or violation of the Company's policies, regulations, or business ethics. All whistleblower reports will be kept strictly confidential and can be submitted through more than one channel.

Upon receipt of a complaint or allegation, the Company will conduct an investigation according to the nature of the complaint. In the event that the complaint is serious and complicated, an Investigation Committee will be appointed to carry out an investigation and resolve the complaint.

Measures to protect the rights of whistleblowers

The Company has set measures to protect the rights of whistleblowers and complainants as follows;

- The Company will maintain confidentiality of personal information and identity of a whistleblower and person accused of misconduct.
- Information will be disclosed only to the extent necessary by taking into consideration the safety of, and risk of retaliation to, a whistleblower or any other person concerned in a complaint or allegation.
- Appropriate and fair procedures will be adopted to remedy the harm caused to any person affected by a retaliatory action.
- Any persons who believe that they may be subjected to retaliation as a result of whistleblowing or cooperating in an investigation may request the Company to establish appropriate protection measures. Alternatively, if the Company detects cases that present a significant risk of retaliation, the Company may implement protection measures without their request.
- The Company will not tolerate any unjustified actions taken against whistleblowers or persons who have cooperated in an investigation, including but not limited to unjustified reassignment to another position or office, modification of duties, suspension, threat, harassment, or dismissal.

Suggestions for doubts or problems

This Code of Conduct is a set of preliminary practice guidelines for all directors, executives, and employees to follow and therefore, may not cover operations in all cases. If executives or employees have questions or practical problems, they are to consult their immediate supervisor. In the event of a conflict, the decision of the Chief Executive Officer is to be considered final.

Monitoring and ensuring compliance with the policy

The Company determines that it is the duty and responsibility of all directors, executives, and employees to acknowledge, understand, and strictly follow the measures set out in this Code of Conduct. This Code of Conduct is not a voluntary policy and an ignorance of the guidelines in this policy cannot be used as an excuse.

Executives at all levels in the Company are responsible and must place great importance to ensure that employees under their command line understand and strictly comply with the Code of Conduct and its guidelines.

The Company will not tolerate any conduct that is illegal or deferent to good ethical principles. Any director, executive, or employee who violates the established ethics will receive a strict disciplinary penalty and may be subject to legal penalties.

Policy review

The Company requires an annual review of the Code of Conduct.

Disciplinary action

The Company considers the Code of Conduct a part of discipline that all directors, executives, and employees must strictly follow. Violation or non-compliance of the Code of Conduct constitutes a violation of the discipline in accordance with the rules of personnel management.

Directors, executives, and all employees are obliged to follow and encourage others to comply with the Code of Conduct, in which the following actions are regarded as a disciplinary offense.

1. Not in compliance with the Code of Conduct:
2. Advising, encouraging or supporting others against compliance with the Code of Conduct:
3. Neglecting when exposed to a violation of or non-compliance with the Code of Conduct:
4. Not cooperating or obstructing the investigation and fact-finding and:
5. Treating others unfairly due to the report on being non-compliant with the Code of Conduct.

Notified on this 12th day of December 2024

(Mr. Sarawut Charuchinda)

Chairman of the Board

AssetWise Public Company Limited