

**- Translation -**

**Beryl 8 Plus Public Company Limited**  
**Code of Conduct**  
**For Directors, Executives, and Employees**  
**(As approved by the Board of Directors' Meeting No. 1/2021 held on June 9, 2021)**

**Implementation Scope**

Beryl 8 Plus Public Company Limited (the “**Company**”) has established a code of conduct (the “**Business code of conduct**”) as a standard practice that applies to company directors, executives, and employees at all levels to follow in accordance with their assigned duties. It also encourages executives to act as a good role model in their performance under the business code of conduct. It is important that the company executives and employees acknowledge, understand, and strictly follow the code to ensure that their performances are effective, open, transparent, based on maximum benefit to the company, and fair to all interested persons.

This business code of conduct is applied to all company directors, executives, and employees.

“**Executives**” refers to the Chief Executive Officer and all executives from the positions under the Chief Executive Officer to the functional heads.

“**Employees**” refers to the company employees whose positions are below the Chief Executive Officer to functional heads including permanent employees, temporary staffs, special contractors, and outsourced workers.

**Best Practices**

**1. Conflict of Interest Policy**

1.1 Executives

After the company has been converted to a listed company in the Stock Exchange of Thailand, the company must follow the Stock Exchange of Thailand’s regulation. The executives must consider the conflict of interest relevant to the company and its subsidiaries cautiously, honestly, reasonably, and independently under the good ethical frame and based on the company’s benefit to ensure that such issues are reasonable and beneficial to the company.

1.2 Employees

1.2.1 Employees should avoid any actions that create the conflict of interest with the company either by contacting the parties involving the company’s trading such as business partners, customers, competitors, or by seeking opportunities or

data received from being a company employee to gain his/her own benefits, or by doing business that is considered as competitors to the company.

- 1.2.2 Employees must not work for another person or organization which offers remuneration during company's office hours unless prior approval in writing by the Chief Executive Officer or his assignee.
- 1.2.3 Employees must protect the company's benefit with his best effort.
- 1.2.4 Employees must not act or perform any operations which may create a conflict of interest with the company directly or indirectly.
- 1.2.5 Employees must not involve in any business operations which may impact the company's benefit or compete with the company's business.

## **2. Usage and Maintenance of the Company's Assets and Information/Secret Policy**

- 2.1 Any procedures, processes, thoughts, and technical knowledge or other knowledge and/or techniques related to the business or company's operation which come from thoughts, studies, researches, and/or any actions from the operation according to the duties and employment contract of the executives and employees in any case would be considered as company's intellectual property, with or without legal registration. Distribution of such properties is prohibited unless having approval from the Chief Executive Officer or his assignee in writing.
- 2.2 During the course of employment, and within one year from the employment termination date, if the executives or employees can access to the company's information, classified as "trade secrets", they agree to maintain confidentiality of all the "trade secrets" they have or know during working for the company. They agree to hand it in to the company and not to give to other parties or duplicate it without a permission and not to disclose or do any actions that harm the company's reputation or damage the company's business. They are not allowed to be hired as executives or employees or give advice or support or make agreements with any juristic persons or company's competitors or any business similar to the company's business in such period.

For interpretation purpose, "a trade secret" refers to commercial information which is not commonly known or still inaccessible among the people who should normally know. It is the information containing competitive advantage because it's a secret and the company has used a proper measure to keep it confidential. The trade secret may be part of the company's regulation, contract, or agreement that has been started or soon to be addressed or based on the Trade Secret Act B.E. 2545 (including its amendment).

- 2.3 Executives or employees must not work for another person or organization which offers remuneration during company's office hours unless approved in writing by the Chief Executive Officer or his assignee.
- 2.4 Executives or employees must not take any action considered as a conflict of interest to the company directly or indirectly, either by oneself or others.
- 2.5 Executives or employees must not take/utilize the company's assets for commercial purpose or personal interest. The usage must only be for the company's benefit.
- 2.6 Executives or employees must strictly follow the company's information system policy. For example,
- They must not invade other's privacy in any circumstances.
  - They must not access the company's confidential information, unless they're the executives or employees who are responsible for such information.
  - They must stick to the rules and regulations regarding the usage of the equipment and devices of the computer system.
  - They must not access the information or document files of other users without permission.
- 2.7 Executives or employees must acknowledge and follow the guideline to the proper use of the computer and network system.
- 2.8 Unauthorized software installation or saving on the company's computer system is prohibited unless proceeding through the company's Software Installation Procedure and regulations.
- 2.9 The internet usage or the internet system connection of employees for data transferring purpose must not be against the law or relevant regulations. For example, they must not transmit obscene pornography, send or receive information or news through electronic system which is against the copyright law, or against the purpose or objective of the company's policies or regulations, or violates the Computer-Related Crime Act B.E. 2550 (including its amendment) or any other laws. It is advised that the employees follow the company's Information Security Policy.
- 2.10 During the course of employment, executives or employees must not intentionally do or refrain from doing any action which leads to the damage to the company by any false or incorrect information, news, and/or reports, memorandums, or communication regardless of the methods.

- 2.11 Executives or employees must not commit piracy, or violate copyright of the company or other companies who grant permission to the company to utilize their computer programs as part of the agreement and/or by any methods, and/or duplicate, modify, disclose to the public or lease an original or a copy, either with commercial or non-commercial purpose. Failure to comply will lead to the immediate termination of the employment contract.
- 2.12 Executives or employees must use the company's assets with care. They are responsible for keeping devices provided by the company in good condition and request a repair when the devices are in unusable condition.
- 2.13 Executives or employees must not violate the company's regulations or orders which could lead to accidents or damages to the company's assets.
- 2.14 Executives or employees must protect the company's assets from loss or damage even though such asset is not directly under his/her own responsibility.
- 2.15 Executives or employees must not use the company's equipment or assets for purposes other than for the company's benefit.
- 2.16 All executives or employees must keep secret information between the company and customers, partners of contract, business partners, or other parties.
- 2.17 Executives or employees must understand the process and methods of the information security and follow strictly to prevent unintended secret information leakage.
- 2.18 The Chief Executive Officer or person assigned will make the decision for information disclosure to public.
- 2.19 Executives or employees must comply with the Company's policies related to the protection of personal information.

### **3. Anti-corruption measures/guidelines**

- 3.1 Directors, executives, and employees of all grades and ranks, including other individuals working under the supervision of the company, are not allowed to take part in all types of corruption, both directly and indirectly, as well as seeking for improper interest of any form, such as requesting for, accepting, offering, or providing assets, and other interest to state officials or other persons that are engaged in the business of the company, etc.
- 3.2 Directors, executives, and employees shall establish integrity and impartial organizational culture. They are not allowed to be tolerant to corruption in any kind of business. All transactions of the company that involve working with State agencies and officials must be conducted transparently, honestly with auditable proof and the procedures must be in compliance with relevant laws.

- 3.3 The company does not allow its directors, executives, and employees, as well as other persons working for other companies that are under the supervision of the Company to request for, proceed, or be tolerant to corruption for the benefit of oneself, family, friends, and acquaintance.
- 3.4 The company shall stipulate sale and marketing procedures. Each step must have clear evidence and appropriately approval authority at each level, in order to concern potential corruption risk, as well as preparing solutions to such problems.
- 3.5 The company requires to have clear procedures for procurement and contract execution, objectives for transactions, disbursement, or any contract settlement. Each step must be supported with an explicit proof. Throughout a management line there should be persons authorized to approve together with suitable solutions to problems, if any.
- 3.6 The company shall provide communications and training for all employees in order to promote integrity and prepare them for principles and ethics that are in line with the corporate governance policies. Moreover, the Company shall also set forth work management procedures that reflect commitment of the organization in achieving successful anti-corruption measures, starting from the step of recruitment to training, evaluation, compensation, and promotion.
- 3.7 The company shall provide internal audit to ensure that the internal control system effectively drives the Company to achieve the set goals. The audit shall also applied to all business unit to fulfill possible gaps in the plans that have been approved by the Audit Committee, as well as to render suggestion concerning development of the operational system for efficiency and better work performance, in pursuance of the good corporate governance and anti-corruption policies/measures.
- 3.8 The company shall act fairly and protect all employees and stakeholders who have refuse to be involved in a kind of corruption or provide information regarding such matter by using any measure, at full capacity, within the scope of power and responsibilities taken by the Company.
- 3.9 For an employment of a third party to coordinate with State officials, it is required to ensure that such third party is not involved in a bribery.
- 3.10 Where required by law, the company shall be in collaboration with the public sector, requesting all agencies that partner with the public sector to disclose balance sheets before the Office of the National Anti-Corruption Commission (ONACC).
- 3.11 The company has prepared written procedures about rendering suggestions for anti-corruption measures.

- 3.12 The anti-corruption policies and guidelines are deemed as part of disciplinary action of all directors, executives, and employees of the company. It is deemed that a person ignoring or breaching the policies and guidelines has committed disciplinary wrongdoing and shall be subject to penalties based on the company's regulations. In this regard, such person may be subject to a legal penalty if the action committed also breaches the laws.

#### **4. Gifts or Entertainment Offering and Acceptance**

- 4.1 Executives or employees shall not solicit, accept or agree to receive money, gold, valuables or other favors from the company's business dealers.
- 4.2 Executives or employees may accept gift offering on festive occasions or according to cultural traditions if the gift is valued at less than THB 3,000/ person/ time. Such acceptance must not influence the recipient's business decision making. If the executives or employees receive gifts on festive occasions or a treatment that is valued at more than THB 3,000/ person/ time from the persons related to the company's business, they shall report it to their immediate supervisor.
- 4.3 In case it is necessary to receive and inappropriate to decline, the offering and acceptance of gift and entertainment should follow the below criteria.

##### Gift Offering

- Executives or employees may offer gifts or souvenirs on festive occasions valued at less than THB 3,000/ person/ time. The offering must not violate the related law or influence any business decision making of the recipients.
- Gifts or entertainment offered valued more than THB 3,000/ person/ time must be approved by the authorized persons in the company's authorization guide.

##### Gift Acceptance

- If the gift offered by the company's business-related third parties on festive occasions to the executives or employees is valued at less than THB 3,000/ person/ time, where the acceptance or the gift itself is not illegal, the recipient shall submit gift, valuables, or favors to their immediate supervisor for consideration.
- If the executives or employees receive gifts, valuables, or favors valued at more than THB 3,000/ person/ time, they shall submit it to the Corporate Services Department to register the item in the central gift registration and issue the gift reference number for the company's future activities.

- 4.4 Executives or employees are required to inform their external interested persons of the company's Gifts and Entertainment Acceptance Policy.

## **5. Securities Trading and Inside Information Policy**

- 5.1 Directors or executives have the duty to report each person's securities holding according to the regulations of the Stock Exchange of Thailand and The Securities and Exchange Commission, Thailand.
- 5.2 The company must follow the law of insider trading and must be equal and fair to all shareholders. To prevent illegal acts of the company's employees at any levels including their family members who know or may know the unpublic inside information, the company forbid the fiduciary to buy, sell, or convince other third parties to buy, sell or make an offer to buy or sell securities of companies' shares which are in the Stock Exchange of Thailand, either by themselves or brokers while possessing such unpublic inside information. (Additional information can be found from Inside Information Policy.)
- 5.3 The company has set a workplace security system to protect confidential folders and document and manage the unpublic information to be accessible by only related and necessary people. The owner or holder of unpublic information must urge those people to follow the security procedure strictly. Failure to comply will lead to the disciplinary and/or legal penalty based on individual case.

## **6. Internal Controls and Internal Audit System, and Accounting and Financial Report Policies.**

- 6.1 Internal Controls and Internal Audit System Policy

The company has established effective internal controls and internal audit system under the internal auditors and reviewed by the Audit Committee.

- 6.2 Accounting and Financial Report Policy

The company's management is responsible for the preparation of the accurate, complete, and timely financial reports, both the yearly and quarterly statement. The report must be prepared with the acceptable accounting standard.

- 6.2.1 Accuracy of Accounting Records

- Any types of each business records must be accurate, complete, and auditable without any restriction or exception.
- Every accounting or business recording must be true. Distortion or false records are strictly prohibited regardless of the purpose of the action.
- Employees at all levels must perform their business dealing by following the company's rules and regulations. All transactions should attach

complete evidence and the information should be adequate, useful, and timely so that the persons responsible for recording, reporting and assessing the accounting and financial report can record the correct and complete company's business records in the company's accounting system.

#### 6.2.2 Accounting and Financial Report

- Executives or employees must not distort, conceal, or falsify any information in the business records regarding the accounting and finance or in the operation records.
- Executives or employees are reminded that the accuracy of the accounting and financial report is the mutual responsibility of company directors, executives, and responsible employees.
- All executives or employees are responsible for the preparation and disclosure of business transaction information.

#### 6.2.3 Best Practices for Legal Compliance

- Employees at all levels must follow the rules and regulations both domestically and/or internationally to make accurate and complete accounting and financial report of the company.
- Every level of employee must focus on the integrity, impartiality, and honesty in information recording.

### 7. Responsibilities to Shareholders Policy

- The company will run its business with integrity and fairness to all shareholders.
- The company will report the corporate status to the shareholders regularly and accurately.
- The company should report the organizational future tendency in a positive and negative aspect with adequate supporting rationale.

### 8. Executive and Employee Treatment Policy

- The company should provide a fair compensation to executives and employees.
- The company should provide a safe work environment for life and assets of the executives or employees.
- Promotion, transfer, reward or punishment must be proceeded with honesty and based on the knowledge, capability and suitability of executives or employees.



- The company should focus on the employees' knowledge, capability, and skill development by giving them opportunities regularly and without any exception.
- The company must strictly comply with the law and regulations relevant to the executives and employees.

#### **9. Executive or Employee Behavior Policy**

- Employees should perform their duty with determination, integrity, and transparency.
- Employees should avoid offering gifts to their supervisors or receiving gifts from their subordinates.
- Employees should respect the right of other executives or employees.
- Supervisors should possess respectable behavior and the employees should not behave disrespectfully to their supervisors.
- All employees should be self-disciplinary and should follow organizational regulations and good tradition, whether written or unwritten.
- Employees should create and maintain harmony and unity in the workplace and avoid any actions that could lead to the damage of the company's reputation or image or cause problems to the company in the future.

#### **10. Human Right & Diversity and Inclusion Policy**

Recognizing the benefits of leveraging diversity in terms of ideas, skills and experiences of employees to drive the business, the Company has promoted a workplace that provides work environment with mutual respect, a collaborative spirit despite differences in backgrounds and free of discrimination and harassment. The Discrimination and Workplace Harassment Policy has therefore been established as the basis for ensuring smooth operations in accordance with the Universal Declaration of Human Rights (UDHR), United Nations Global Compact (UNGC), United Nations Guiding Principles on Business and Human Rights (UNGPR), including the International Labor Organization's Declaration on Fundamental Principles and Rights at Work.

The Company shall seek to prevent and protect employees at all levels against discrimination and various types of harassment in order to make a pleasant and safe workplace. The Company shall investigate the incidents where employees are harassed in the workplace fairly for all parties involved.

### Definition

**Discrimination** refers to differential treatment of an individual or group of people based on their race, national origin, religion, belief, language, ethnicity, gender, status, skin color, social status, political opinion differences, disability, as well as marital status.

**Harassment** refers to any verbal or physical behaviors, or unwelcome conduct that would be considered harassment, discrimination, intimidation, hostility, retaliation, even without intention but adversely affect the victim physically and/or mentally, including sexual harassment.

Directors, executives and all employees must recognize the importance of human rights, human dignity, freedom and equality including compliance with relevant international laws and principles, promoting respect for human rights by suppliers and business partners and encouraging them to apply the principles of human rights as specified in this Policy to their business operations. The Company has set the Human Rights & Diversity and Inclusion Policy, the details of which are as follows:

1. To respect and comply with the laws and the principles of human rights, , respect each other without discrimination due to differences in race, origin, religion, belief, language, ethnicity, gender, status, skin color, social status, political opinion differences, disability or any other status of all stakeholders in all localities in which the Company operates its business.
2. To be aware of and avoid taking any actions that are considered a human rights violation both directly and indirectly to all stakeholders.
3. To identify and comprehensively and constantly assess human rights risks and impacts on business activities along with setting out guidelines for monitoring, auditing and managing appropriately. In the event of force majeure, the Company shall take the matter into consideration as soon as possible and put appropriate and effective remediation process in place in accordance with the principles of fairness and equality.
4. To support and promote human rights respect among all stakeholders in all aspects by encouraging engagement and observance of human rights, communicating, disseminating and educating all stakeholders as well as promoting suppliers and business partners to respect human rights throughout their business operations in accordance with the principles of human rights and this Policy.
5. To oversee the respect for human rights, not to ignore when witnessing any acts of violations of human rights related to the Company's affairs and report the incidents to the supervisors or through the Whistleblowing Channels of the Company.

## Guidelines

The Company has set out guidelines to prevent discrimination and/or workplace harassment, the details of which are as follows:

### **1. Recruitment, selection and placement of human resources**

- All job postings shall not contain any discrimination statements.
- Recruitment and selection of employees shall be carried out without discrimination on the basis of age, gender, race, nationality, disability, religion, language used. The Company shall consider the required qualifications according to the positions open for applications.
- Wages, benefits and employment conditions shall be offered to applicants in accordance with the standards of each position.
- Application documents must be kept confidential and shall not be disclosed to unrelated parties and specific users should be identified.  
Psychological testing and physical examination prior to the beginning of the working process must be work-related.

### **2. Human Resource Development**

- Human resource development must be undertaken equally among all employees without discrimination by taking into consideration the training needs of each employee in taking a particular position for his/her career advancement.
- There shall be no discrimination in approving training programs for employees.

### **3. Performance Assessment**

- In assessing performance, clear and transparent criteria must be in place and performance assessment must be based on employees' actual performance, including their behaviors that must be consistent with the Company's corporate values. There should be a discussion between supervisors and subordinates to create an understanding of their performance assessment results.

### **4. Employee benefits**

- Consideration of benefits and employee promotion must be taken in accordance with the policies set by the Company to ensure transparency and adherence to the same standards for employees in each position.

### **5. Transfer / Dismissal**

- The transfer process must be based on equal career growth opportunities and non-discrimination

- The dismissal must be based on a valid reason, by reference to the incapability to perform to a satisfactory standard within their role or disciplinary actions, or a reason of ill health diagnosed by a physician or other non-discrimination reasons.

#### Guidelines on Discrimination and Workplace Harassment

1. The victim notifies the offender to stop the action immediately.
2. If the offender ignores and the discrimination/harassment continues, the victim shall report discrimination/harassment to their direct supervisor or the supervisor's boss or an executive from the Human Resources Department as appropriate.
3. An executive at the general manager level and above from the Human Resources Department inquires the victim, the accused and the witnesses (if any) about the incident within seven (7) days after receiving a notification.
4. An executive at the general manager level and above from the Human Resources Department sets up the Investigation Committee consisting of at least three (3) persons as follows:
  - An executive at the Assistant Managing Director Level and above from the accused's line of work
  - An executive at the Assistant Managing Director Level and above from non-related line of work (middleman)
  - An executive at the General Manager Level and above from the Human Resources Department.
5. Take disciplinary actions against the offender or persons who make a false notification based on the investigation results of the Investigation Committee.
6. In criminal cases which require legal actions, the Legal Department must be involved in the investigation process.

The victim reporting harassment incidents will be given appropriate protection against the negative consequences from reporting the incidents.

### **11. Corporate Governance Policy**

Directors, executives and all employees of the Company must comply with the laws, the Company's objectives and articles of association and resolutions of the Shareholders' Meeting, and adhere to the Company's Corporate Governance Policy, which has been prepared in accordance with the principles of good corporate governance for listed companies (Corporate Governance Code or "CG Code") in accordance with the guidelines prescribed by the Office of the Securities and Exchange Commission and the Stock Exchange of Thailand

that would serve as guidelines for performing their duties accordingly. Please consider the Company's Corporate Governance Policy for further information.

**Code of Conduct Monitoring**

- 1) In case where there is a violation of laws, regulations, orders, code of conduct, or policies of the Company or in case that the supervisors allow their subordinates' violations to occur, the executives or employees must directly report the incidents to the Human Resources Department. The Human Resources Department shall follow procedures prescribed in the Policy and regulations relevant to such issues.
- 2) The Company shall review the Company's code of conduct every two (2) years in order to be adequate to cope with changing circumstances and business environment.

The Code of Conduct for Directors, Executives and Employees shall be effective from June 9, 2021.

(Mr. Chatchaval Jiaravanon)  
Chairman of the Board of Directors  
June 9, 2021