(*Translation*)

# Announcement
## No. LIT 024/2025
## Code of Conduct (Revision No.1)

*(Note: This document is an English translation of the original Thai version. In the event of any discrepancy or conflict between the English translation and the Thai original, the Thai version shall prevail in all respects.)*

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| Endorsed by | LIT – Corporate Governance Committee, November 7, 2025 |
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**Revision History**

| Effective Date | Significant Changes |
|---|---|
| October 18, 2024 | Code of Conduct<br>- Endorsed by the Corporate Governance Committee on September 16, 2024<br>- Approved by the Board of Directors on October 7, 2024 |
| November 18, 2025 | Section 1: Code of Conduct<br>- Chapter 3: Role of Stakeholders (revised)<br>A: Protection of Stakeholders' Rights: enhancing guidelines for treatment of customers, partners, creditors, competitors, society, community, and the environment.".<br>B: Respecting Human Rights Principles<br>E: Whistleblowing Channels<br>- Employee Code of Conduct: revised Topic 13. Respecting for Human Rights<br>Section 2: Monitoring, compliance the Whistleblowing Channels |

# Code of Conduct (Revised Edition 1)

## Message from the Chairman

Lease IT Public Company Limited is committed to Corporate Governance principle, operating with integrity, transparency, and morality, while maintaining responsibility to all stakeholders.

The Company has established this Code of Conduct to align with the evolving standards of Good Corporate Governance and to promote an effective internal control system. This document integrates our Vision, Mission, Good Corporate Governance Policy, Core Values, and the Code of Ethics for directors, executives, and employees into a single resource as well as updating certain contents guidelines to better suit the Company's business for everyone to adhere to.

In this regard, the Code of Conduct is designed to ensure that everyone understands the Company's business objectives and guidelines. It serves as a tool to help everyone to comprehend their roles and responsibilities, while also acting as a guide for decision-making in various matters related to the Company's business operations.

To demonstrate our collective commitment to this Code of Conduct, it is the duty and responsibility of all directors, executives, and employees to thoroughly study and understand its principles. Furthermore, everyone is require to sign an acknowledgment and adhere to these guideline to study and uphold the Good Corporate Governance of Lease IT Public Company Limited and its subsidiaries moving forward.

Police General Jate Mongkulhutthi
Chairman of the Board
Lease IT Public Company Limited

# Vision, Mission and Core Value

## Vision

To Create opportunities for ALL

## Mission

To be an alternative non-banking source of funding that creates opportunities for Small and Medium Enterprises (SMEs) and individual to access funding equally and transparently, leading to success and sustainable growth.

## Core Value

Consists of UMIC, meaning are as follows;

U – Unity = Being united as one / Oneness

M – Move Forward = Daring to change

I – Integrity = Honesty and integrity

C – Care = Attentiveness / Caring

# Section 1: Code of Conduct

## 1. Good Corporate Governance Policy

The Board of Directors places great importance on Good Corporate Governance. Because it is considered to be an important mechanism leading to an efficient, transparent, and auditable management system. This will help build trust and confidence among shareholders, investors, and stakeholders, and all involved parties. Having good corporate governance will be a tool to add value. Create competitiveness including promoting sustainable growth of the company in the long term. In preparing the corporate governance framework, the Company studied the regulations issued by regulatory agencies, namely the Securities and Exchange Act B.E. 2535 and the Public Limited Companies Act B.E. 2535. Announcements and regulations of the Securities and Exchange Act B.E. 2535 and the Public Limited Companies Act B.E.2535. Announcements and regulations of the Securities and Exchange Commission and the Stock Exchange of Thailand By adapting as appropriate.

The Board of Directors has resolved to approve the establishment of a Good Corporate Governance Policy in accordance with the guidelines of the Stock Exchange of Thailand. Covers 5 principles: Rights of Shareholders, Treating shareholders equally Role of Stakeholders, Disclosure and Transparency and Responsibilities of the committee. This is in line with the principles of good corporate governance for listed companies 2017 (CG Code) in various matter as follows:

Principle 1: Establish Clear Leadership Role and Responsibilities of the Board
Principle 2: Define Objectives that Promote Sustainable Value Creation.
Principle 3: Strengthen Board Effectiveness.
Principle 4: Ensure Effective CEO and People Management
Principle 5: Nurture Innovation and Responsible Business.
Principle 6: Strengthen Effective Risk Management and Internal Control.
Principle 7: Ensure Disclosure and Financial Integrity.
Principle 8: Ensure Engagement and Communication with Shareholders.

## Chapter 1: Rights of Shareholders

The Company recognizes and prioritizes shareholder's rights as prescribed by law, which include the right to attend shareholders' meetings; the right to appoint a proxy to attend and vote on their behalf; the right to vote for the election or removal of individual directors; the right to vote on the annual determination of directors' remuneration; Additional, shareholder hold the right to vote on the appointment and remuneration of the external auditor as well as the right to. participate in and stay informed about significant corporate changes, these extends to receiving information regarding change in capital structure, shifts in controlling interest, or major asset acquisitions and disposals. Furthermore, the Company provides opportunities for shareholders to express opinions and raise inquiries during meetings, propose agenda items, and nominate candidates for directorship. Shareholders also retain the right to contribute to the enhancement of the Company's performance, the right to a share of profits, and the right to receive adequate and timely information. The Board of Directors is firmly committed to encouraging all shareholders to fully exercise their rights and pledges that the Company shall refrain from any actions that violate or infringe upon those rights.

## Chapter 2: Equitable Treatment of Shareholders

The Board of Directors prioritizes and ensures the equitable and fair treatment of all shareholder, including executive and non-executive shareholders, Thai and foreign shareholders, as well as major or minority shareholders, through the following implementations

The Company maintains a policy to protect the rights of all shareholders. During the Annual General Meeting, the Chairman conducts the session according to the agenda specified in the notice of the meeting with no additional agenda items introduced without prior notice. Furthermore, every shareholder is entitled to voting rights based on their shareholding following the principle of one vote for each share held.

The Company grants the opportunity for minority shareholders to propose agenda items and nominate individuals to be elected as directors, prior to the shareholders' meeting. The Company disclosed details regarding the criteria and procedures for such actions by submitting a newsletter to the Stock Exchange of Thailand and on the Company's website at www.leaseit.co.th.

The Company appointed Thailand Securities Depository Co., Ltd. (TSD), its share registrar, to distribute the invitation notice and supporting documents to shareholders at least 21 days prior to the meeting. Furthermore, the meeting notice and all related documents were made available on the Company's website at www.leaseit.co.th, at least 30 days in advance of the meeting. This ensures that shareholders can access information regarding the meeting more conveniently and promptly.

The Company has a policy to provide alternatives for shareholders who are unable to attend the meeting in person. Such shareholders may appoint an Independent Director or any other person as their proxy to attend and vote on their behalf. The Company provides proxy forms as prescribed by the Ministry of Commerce, which include details of required documents/evidence and instructions for the proxy process. These forms allow shareholders to specify their voting directions for each agenda item. The proxy forms are distributed to shareholders along with the invitation notice and are also available for download on the Company's website at www.leaseit.co.th.

The meeting shall be conducted in accordance with the Company's Articles of Association and according to the sequence of the agenda. Comprehensive details for each agenda item will be presented along with clear supporting information. Furthermore, the Company refrains from adding unannounced agenda items unnecessary particularly significant matters that require shareholders to have sufficient time to study the information before making a decision.

## Chapter 3: Role of Stakeholders

### A. Protection of Stakeholders' Rights

The Company recognizes the rights of all stakeholder groups, both internal and external, and ensures that such rights are protected and well treated. This is to foster mutual understanding and cooperation between the Company and its stakeholders, which will benefit business operations, build confidence and stability for both the Company and stakeholders, and ultimately enhance the Company's long-term competitiveness as follows:

**1. Employees**: The Company prioritizes selecting personnel who fit each positon and emphasizes individual with direct experience relevant to the Company's nature of business to ensure job expertise. The Company always recognizes the employees are valuable resource and the foundation of our success. Consequently, the Company is committed to developing employee potential throughout their career path by continuously enhancing their skills, knowledge, and capabilities. Furthermore, the Company provide equal career advancement opportunities for all employees as well as offering competitive compensation packages to motivate them, which are comparable to those of leading companies. The Company has established an employee compensation policy aligned with its performance. In the short term, this includes profitability matric for each year distributed in the form of incentives and bonuses. For the long-term, the Company has adopted Balanced Scorecard framework utilizing Key Performance Indicators (KPIs) as a tool for strategic implementation. This measurement and evaluation approach ensures organizational alignment and focuses on driving factors critical to the Company's success. Furthermore, the Company study and reviews its organizational structure, roles, and responsibilities for each position, regularly evaluating employee performance and career progression develop the Company into an excellent organization. Additionally, the Company established the Employee Joint Investment Program (EJIP) to encourage employee to save and generate long-term investment returns foster a sense of ownership among staff. The program has been implemented twice: the first phase began in 2015 and matured in March 2018, and the second phase commenced in April 2018 and matured in March 2021.

The Company places importance on the welfare and safety of its employees. The Company provides fundamental welfare and benefits as required by law, such as working hours, holidays, annual leaves, and any other types of leave, as well as social security, compensation fund and provident fund, and constantly communicates all benefits to its employees, In additional to those as prescribed by law, the Company also provides other welfare to its employees, such as health insurance, which covers outpatient and inpatient treatment, life insurance, personal accident insurance, annual health check-up, as well as providing healthcare measure, such as communication of preventive measures for epidemics and provision of protective masks and alcohol-based hand gel for its employees and visitors. In addition, the Company also provides financial aid to its employees in various cases, such as wedding, childbirth, ordination, death of close relatives and natural disasters, etc.

**Personnel Development**

Human resources are regarded as the most valuable assets in our business operations; therefore, human capital development is viewed as a continuous, long-term investment. The Company enhances the knowledge, skills and attributes of its staff through two primary development tools: Coaching & Knowledge Sharing and Project Assignments. These methods enable employees to apply their learning directly to their work, strengthening the organization and supporting sustainable business growth. Furthermore, the Company has implemented personnel development programs that cover all organizational levels.

**2. Customers**: The Company has established clear policies and guidelines for treating all customers fairly, with terms and conditions explicitly communicated. We are committed to providing exceptional service and guidance with professional courtesy, while actively listening to customer concerns and offering effective solutions, Customer confidentiality is strictly maintained. Furthermore, the Company has defined clear criteria for customer selection, which focus on the customer's legal existence, debt repayment capacity, and the ability to successfully complete projects. These criteria are rigorously reviewed and approved by the Credit Committee.

Guidelines

2.1 In promoting financial products, the Company operates with transparency. All information presented in documents, brochures, and on the website is accurate and comprehensive, ensuring no exaggerated advertising or misleading claims are made.

2.2 In providing financial services, the Company prioritizes consumer safety by implementing robust Cyber Security controls and establishing a Personal Data Protection Policy in compliance with the Personal Data Protection Act. (PDPA). Furthermore, clear channels and standardized processes are provided for effectively managing and resolving customer complaints.

**3. Partner**:

The Company maintains a procurement and selection process that ensures all partners compete on equal information and are selected with fairness. We encourage our partners to operate ethically and with social and environmental responsibility, while strictly avoiding intellectual property rights infringements. The Company is committed to adhering strictly to commercial agreements, including timely payments according to agreed terms, under the Company's procurement and partner selection guidelines.

**4. Creditor**:

The Board of Directors has established policies and guidelines for treating creditors with responsibility, transparency, and fairness as follows:

4.1 Treats all creditors, including trade creditors and financial institutions, with equality and fairness based on the principle of providing equitable returns for both parties. The Company ensures timely debt repayment to maintain the Group's credibility and reputation with our business partners and lending institutions.

4.2 Strictly adheres to all agreed terms and conditions, particularly with financial institutions, including the designated use of funds, repayment of principal and interest, and guarantee conditions. We prioritize capital management to maintain a strong financial position and ensure sufficient liquidity for timely debt servicing. Furthermore, the Company consistently reports its financial status and information to creditors with accuracy and transparency, in accordance with the agreed-upon conditions.

4.3 In the event that the Group is unable to maintain its financial status or comply with loan covenants for any reason, which may lead to a breach of contract, the Group is committed to notifying creditors immediately to proactively and jointly seek a fair resolution.

**5. Competitors**:

The Company operates with integrity and maintains high service standards adhering to the principle of not disparaging or distorting the facts regarding our competitors. The Company treats competitors with understanding and promote good cooperation, recognizing that all financial service providers share a common duty to deliver quality services to customers.

The Board of Directors supports free and fair competition within the framework of the law and the ethical rules, avoiding any dishonest methods aimed at undermining competitors. to destroy competitors. Our guidelines regarding competitors are as follows:

1. Conduct business and treat competitors within the framework of free and fair competition.
2. Refrain from seeking confidential information of competitors through dishonest or inappropriate means.
3. Do not damage the reputation of competitors through malicious accusations of defamatory remarks.

**6. Social, Community, and Environment**:

The Board of Directors is deeply committed to and prioritizes the safety of communities, society, the environment, and the quality of life of all stakeholders. The Board has established a policy for the Company to conduct its business fairly, ensuring that corporate social and environmental responsibilities are integrated alongside its business operations. To foster environmental and social awareness and responsibility among employees, the Company has organized various activities to support communities, society, and the environment. For instance, the Company in collaboration with its business partners, customers, and creditors has consistently provided structural support, donations, and educational scholarships to youths in remote areas, along with other socially beneficial initiatives. These efforts have been carried out through continuous cooperation with both public and private organizations.

## B. Respect for International Human Rights

The Company supports and adheres to international human rights standards, including the United Nations Universal Declaration of Human Rights and its related conventions. Directors, executives, and employees, as well as any individuals acting on behalf of the Company, must respect the personal dignity, privacy, and individual rights of everyone they engage with during the course of their work. Any actions that violate or encourage the infringement of human rights are strictly prohibited.

The Company's human rights policy is centered on respecting human dignity and ensuring equitable treatment for all stakeholders. We provide equal opportunities and strictly prohibit discrimination based on any differences. Furthermore, we prioritize the protection of vulnerable groups and conduct our business with the utmost care to prevent any human rights violations throughout all operational processes.

The Company has established clear labor guidelines, strictly prohibiting the use of child labor, all forms of forced labor, and human trafficking. We promote fair and transparent employment, ensuring equal and just compensation for all employees. Working hours and overtime are strictly regulated in compliance with the law to support employee well-being. Furthermore, the Company provides comprehensive protection for maternity rights and remains committed to respecting and promoting children's rights by avoiding any business activities that may negatively impact children, while supporting their development through responsible business practices.

The Company respects the personal rights and freedoms of its employees, including their right to freedom of expression and the right to freedom of association and collective bargaining without fear of retaliation. We are committed to promoting occupational health and safety across all workplaces. Furthermore, the Company maintains a zero-tolerance policy towards all forms of discrimination, intimidation, and harassment.

In terms of social responsibility, the Company respects the rights of indigenous peoples and supports the equitable development of quality of life for all community members.

To ensure effective implementation of this policy, the Company has established a human rights risk assessment process and provided grievance channels that ensure fairness and protect the whistleblower's confidentiality. In the event of a violation, the Company is committed to providing appropriate and timely remediation to the affected parties. Perpetrators will face disciplinary action and legal consequences as applicable. Furthermore, the Company regularly reviews this policy and fosters a corporate culture of human rights through continuous communication and training.

## C. Anti-Corruption and Anti-Bribery

The Anti-Corruption Policy was created to serve as guidelines and regulations for appropriate business operations to combat all forms of corruption, including giving and receiving bribes. Corruption and misconduct. By prohibiting directors The company's executives and employees demanded action. or accept corruption in all government and private agencies in which the company is involved. This is for the benefit of the company, oneself, and family members. Friends or people you know. By jointly promoting the value of honesty Honesty and responsibility become an organizational culture. and to regularly review compliance with the anti-corruption policy. As well as reviewing guidelines and operational requirements to be in line with business changes, rules, regulations, and relevant legal requirements.

## D. Policy and Guidelines Regarding Not Violating Intellectual Property and Copyright

The Company set the policy and guideline of The Infringement of intellectual property and license as followings;

(1) The Company's employees must give respect and not to infringe the intellectual property and license of others. If the employees see the behavior of Infringement of intellectual property and license, they must report to their supervisors.

(2) Check the intellectual property or license of things before receiving or using internally in order to reduce Infringement of intellectual property.

(3) The employees have to report to supervisors when facing the breach of such infringement of intellectual property

(4) In working process, the employees must protect the intellectual property of the Company, such as data, program and process and not to reveal to others outside the Company without the Company's permission.

**Caution**

1) To copy adapt or apply any electronically equipment, data, or Information Technology without reasonable cause.

2) To use confidential data without owner's permission.

3) To make a decision on receiving, using and right protecting of intellectual property without the clear and accurate understanding.

## E. Whistleblowing Procedures and Whistleblower Protection

When directors, executives, employees, or the general public or outsiders see directors, executives, employees, or people involved in business with the company commit wrongdoing or have behavior that is suggestive of bribery. Corruption and misconduct can provide information or provide clues to wrongdoing. Through the following channels.

1. **Email** : To the Chairman of the Board of Directors or Chairman of the Audit Committee at email: *fraud@leaseit.co.th*
2. **Post Mail**: To the Chairman of the Board of Directors or the Chairman of the Audit Committee.
   address: *Lease IT Public Company Limited No. 1023 MS Siam Tower Building, 29th Floor,*
   *Rama 3 Road, Chong Nonsi Subdistrict, Yannawa District, Bangkok 10120*
3. **Company website:** https://www.leaseit.co.th Topic "Whistleblowing/Complaints/Feedback"

## Whistleblowing or Complaint Procedure

Whistleblowers or informants must proceed as follows:

1. Clearly state the name and address of the whistleblower or informant.
2. Provide a telephone number or e-mail address through which the whistleblower can be contacted.
3. Specify the facts or circumstances observed or suspected that a director, executive, employee, and/or business associate of the Company has committed wrongdoing, or exhibited behavior implying bribery, corruption, or misconduct.
4. Specify the name of the director, executive, employee, and their job title (if known), or the name of the business associate suspected of wrongdoing, along with sufficient supporting evidence such as witnesses, documentary evidence, physical evidence, photographs, or video clips (if any) to ensure a swift and efficient investigation.
5. The reported information must be truthful and well-founded, not intended to create a trend or cause defamatory news to the Company and/or its subsidiaries, or to any director, executive, employee, and/or business associate. Anyone who reports false information that causes damage to others may be subject to liability under the Penal Code.

In addition to the aforementioned criteria, the Audit Committee retains its legitimate discretion to determine, on a case-by-case basis, whether to accept a reported matter for investigation.

## Providing protection for whistleblowers

The Company has established measures to protect and maintain the confidentiality of whistleblowers. To create confidence that reporting clues or providing information It will not cause the whistleblower to suffer and suffer damage as follows.

1) In the case where the whistleblower specifies name, address, and telephone number. When the company receives the matter, it is considered a company secret. Then send a copy with the whistleblower's name sealed to the Investigative Committee to conduct a secret investigation to determine the truthfulness of the whistleblower's truth.

2) The Company and its subsidiaries provide protection to those who cooperate in reporting clues or providing information. or deny corruption related to the company and its subsidiaries so that no distress, danger or unfairness arises from reporting such information.

3) In the case that the whistleblower is an employee of the Company and its subsidiaries, there will not be any consequences such as demotion, punishment, transfer, or negative consequences for the employees of the company who report the wrongdoing. or deny corruption even though such actions will result in the Company and its subsidiaries losing business opportunities.

4) In the case where it is found that directors, executives, and employees treat other people in an unfair manner. or cause damage to another person with the motive that that other person has reported the wrongdoing or refused to give a bribe. Corruption and misconduct are considered disciplinary offense.

5) The whistleblower and those involved in the fact-finding process must conduct an inspection and investigation according to regulations. Guidelines set by the company and must keep the personal information of the whistleblower secret. If anyone violates this and reveals such personal information without permission. That person will be subject to disciplinary action. or take legal action.

## Chapter 4 Disclosure and Transparency

The Board of Directors prioritizes the disclosure of information with accuracy, completeness, and transparency. This includes financial reports and general information in accordance with the regulations of the Securities and Exchange Commission (SEC) and the Stock Exchange of Thailand (SET), as well as significant information that may impact the Company's stock price and the decision-making process of investors and stakeholders. To ensure that all stakeholders receive information equitably, the Company disseminates its information and news releases in both Thai and English to shareholders and the general public. These communications are distributed through the Stock Exchange's channels and the Company's website (www.leaseit.co.th), which is regularly updated to reflect the most current information. Furthermore, the Company organizes meetings to present performance results to shareholders, investors, analysts, fund managers, and interested parties, as well as press conferences for the media. During these sessions, the Company's executives participate to provide clarifications and respond to inquiries.

The Board of Directors has approved a policy requiring the reporting of the Company's securities trading and holdings to the Board. This policy includes measures to prevent the misuse of insider information (Insider Trading) by relevant persons, including directors, executives, and employees, as well as their spouses and minor children. It also establishes penalties for unauthorized disclosure or the use of corporate information for personal gain. Furthermore, the Company provides education to directors and executives regarding their legal obligations to report securities holdings and changes in ownership for themselves, their spouses, and minor children to the Securities and Exchange Commission (SEC), in compliance with Section 59 of the Securities and Exchange Act B.E. 2535 (1992) and its associated penalties.

The Board of Directors recognizes its responsibility for the financial reports, ensuring they are accurate, complete, factual, and reasonable. The Company's financial statements are prepared in accordance with Generally Accepted Accounting Principles (GAAP), employing appropriate and consistent accounting policies, exercised with careful judgment, and supported by adequate disclosures in the notes to the financial statements. Furthermore, the Board maintains an effective internal control system to provide reasonable assurance regarding the integrity of accounting records and the safeguarding of assets, aimed at identifying deficiencies and preventing fraud or material irregularities. To support this, an Audit Committeecomprising non-executive directorsis appointed to oversee financial reporting, related party transactions, and internal controls, reporting directly to the Board. In addition, the Board has prepared the 'Report of the Board of Directors' Responsibilities for Financial Statements,' which is disclosed in the Form 56-1 One Report. Additionally, The Board of Directors is also responsible for reviewing and approving significant related party transactions, specifically those exceeding 10 million Baht or transactions that exceed the approved budget.

The Company attaches great importance to the disclosure of material information, including business strategies and key performance indicators (KPIs) encompassing both financial and non-financial data such as market share and customer satisfaction levels. This information is duly disclosed to investors and other interested parties.

## Chapter 5 Responsibilities of the Board of Directors

### Roles and Responsibilities of the Chairman of the Board of Directors

According to Article 29 of the Company's Articles of Association, 'In calling a meeting of the Board of Directors, a notice of the meeting shall be sent to the directors not less than three (3) days prior to the date of the meeting. However, in cases of necessity or urgency to protect the rights or benefits of the Company, the meeting notification may be delivered via electronic means or any other methods, and an earlier meeting date may be scheduled.

The Board of Directors may deliver the notice of the meeting to the directors via electronic means, provided that the director has expressed such intention or granted consent in writing or through electronic channels, in accordance with the procedures and within the timeframe prescribed by the Company or the criteria established by the Registrar.

To ensure a clear segregation of duties between the determination of corporate policies and the management of the Company's operations, the Company requires that the Chairman of the Board and the Chief Executive Officer be different individuals.

## The roles and responsibilities of the Chairman are as follows:

1. To convene Board of Directors meetings and preside as Chairman of both Board and Shareholders' meetings; and to play a key role in determining the meeting agenda in collaboration with the Managing Director.
2. To ensure the efficiency of meetings in accordance with the Company's Articles of Association; and to support and provide opportunities for directors to express their opinions independently.
3. To support and encourage the Board of Directors in performing their duties to the best of their abilities, within the scope of their authority and responsibilities, and in compliance with Good Corporate Governance principles.
4. To oversee and monitor the management of the Board of Directors and other sub-committees to ensure the achievement of the specified objectives.
5. To cast the deciding vote in the event of a tie in the Board of Directors meeting.

## Roles and Responsibilities of the Board of Directors

1. The Board of Directors is authorized and responsible for managing the Company in accordance with the law, the Company's objectives, and the Articles of Association, as well as lawful resolutions of the shareholders' meetings, with integrity and due care to protect the Company's interests.
2. To ensure the preparation of the Statement of Financial Position and the Statement of Comprehensive Income at the end of the Company's fiscal year, which must be audited by the authorized auditor and presented to the shareholders' meeting for consideration and approval.
3. To establish goals, strategic directions, policies, business operation plans, and budgets; and to monitor and supervise the Management's administration to ensure that it is carried out efficiently and effectively in accordance with the established policies, plans, and budgets.
4. To review, monitor, and approve business expansion plans, major investment projects, and joint ventures with other operators as proposed by the Management.
5. To formulate enterprise-wide risk management policies and oversee the implementation of systems or processes to manage risks, including appropriate mitigation measures and controls to minimize impact on the Company's business.
6. To determine the management structure and exercise the authority to appoint the Executive Committee, the Managing Director/Chief Executive Officer, and other sub-committees as appropriate (such as the Audit Committee, Nomination Committee, and Remuneration Committee); including defining the scope of authority and responsibilities for the Executive Committee, the Managing Director/Chief Executive Officer, and all appointed sub-committees.

Such delegation of authority must not be granted in a manner that enables the Executive Committee, the Managing Director/Chief Executive Officer, or any sub-committees to consider and approve transactions in which they may have a conflict of interest, a vested interest, or any other conflict of interest with the Company or its subsidiaries (if any); except for the approval of transactions that comply with the policies and criteria previously considered and approved by the Board of Directors.

7. The Board of Directors may delegate authority to one or more directors or any other person to perform any act on its behalf, under the supervision of the Board, or may delegate authority to such person(s) as the Board deems appropriate and within a timeframe it sees fit. The Board reserves the right to cancel, revoke, change, or amend such delegation of authority at its discretion.

   In this regard, such delegation of authority must not be granted in a manner that enables the authorized person to consider and approve transactions in which they or any person who may have a conflict, a vested interest, or any other conflict of interest (as defined by the notifications of the Capital Market Supervisory Board, and/or the Stock Exchange of Thailand, and/or any other relevant regulatory authorities) may have with the Company or its subsidiaries (if any); unless it is an approval of a transaction that follows the policies and criteria already considered and approved by the Board of Directors.

## Audit Committee

To ensure that the Company's management system is efficient, transparent, and accountable, as well as to build confidence among shareholders and all groups of stakeholders while supporting the Company's sustainable development and growth, the Board of Directors has appointed the Audit Committee to serve as a key mechanism in corporate governance.

The Audit Committee shall consist of at least three (3) independent directors, with at least one (1) member possessing sufficient knowledge, understanding, and experience in accounting and/or finance to effectively perform the duty of reviewing the reliability of the financial reports.

## Scope of Duties and Responsibilities of the Audit Committee

## Authority of the Audit Committee

1. In performing their duties, the Audit Committee has access to information and receives cooperation from the management. They also have the authority to inspect and investigate related individuals to obtain further clarification within the scope of their authority.
2. The Audit Committee may hire specialists, such as financial accounting experts, to provide opinions or assist in audits as deemed necessary. The company is responsible for the expenses incurred.

## Duties of the Audit Committee

1. Review to ensure that the company's financial reports are accurate and in accordance with accounting standards and financial reporting standards stipulated by law, and that information is adequately disclosed.
   1.1 Review significant accounting policies and changes in the company's significant accounting policies to consider their reasonableness, impact on the company, and compliance with generally accepted accounting standards.

1.2 Review the reasonableness and consider the impact of significant unusual items in the financial statements, including assumptions used in management's estimates.

1.3 Review other information related to the financial statements, such as the auditor's report, internal audit report, risk management and governance report, etc.

1.4 Review the disclosure of information in the quarterly or annual financial statements and other related reports, such as the Management Discussion & Analysis (MD&A), including litigation and contingent liabilities.

1.5 Review the management's process of providing information to analysts and the media to ensure consistency with publicly disclosed information.

2. Review to ensure that the company has appropriate and effective internal control and internal audit systems, consider the independence of the internal audit unit, and provide approval for the appointment, transfer, and termination of the head of internal audit or any other unit responsible for internal audit.

   2.1 Review reports from the internal audit unit, auditors, and other regulatory bodies (if any), including follow-up on recommendations in such reports regarding the assessment of the effectiveness of the internal control system and risks in terms of operations, information technology, and anti-corruption.

   2.2 Approve the appointment, transfer, and termination of the head of internal audit or any other unit responsible for internal audit, including considering the independence of the internal audit unit. Meet with the head of internal audit at least once a year without the presence of management to discuss any limitations in the internal audit unit's work that may affect its independence.

   2.3 Review and evaluate the annual internal audit plan to ensure that it aligns with the company's risk types and levels.

   2.4 Review to ensure that the internal audit unit adheres to the audit plan approved by the Audit Committee.

   2.5 Evaluate the overall performance of the internal audit unit.

   2.6 Review the cooperation and coordination between the internal audit unit and the external auditor.

3. Review to ensure that the company complies with the Securities and Exchange Act, the regulations of the Securities and Exchange Commission (SEC), and other relevant laws and regulations.

4. Consider connected transactions or transactions that may involve conflicts of interest to ensure compliance with the law and the regulations of the SEC. This is to ensure that such transactions are reasonable and in the best interests of the company.

5. Consider, select, propose the appointment and removal of the external auditor, including considering and proposing their remuneration to the Board of Directors for their opinion to the shareholders' meeting.

6. Review the independence of the auditor (especially regarding the relationship between the company/subsidiaries and the audit firm, and the provision of services other than auditing). Arrange a meeting between the Audit Committee and the auditor without the presence of management at least once a year.

7. Discuss and require the auditor to emphasize the importance of auditing and report to the Audit Committee on various issues on the agenda for consideration of the financial statement audit results. Discuss with the auditor the scope, methods, and timeframe to be used in the audit, the impact of changes in the company's significant accounting policies (if any), significant accounting

adjustments proposed by the auditor, and management's actions in response to the auditor's proposals.

8. Review unusual issues identified by the auditor, problems, and recommendations in the Management Letter from the auditor to management. Discuss with management the approach and solutions.
9. Conduct an investigation into matters reported by the company's auditor in the event that the auditor finds suspicious behavior that the managing director or person responsible for the company's operations has committed an offense as stipulated in the Securities and Exchange Act (No. 4) B.E. 2551. Report the preliminary findings to the SEC within 30 days from the date of notification by the auditor.
10. Prepare the Audit Committee Report to be disclosed in the company's annual report, which must contain at least the information required by the SEC's announcements.
11. Review to ensure that the company has an appropriate and effective systematic risk management process. Assess the adequacy and appropriateness of strategic risk-taking to enable the company to achieve sustainable growth.
12. Support the work of the Risk Management Committee and the Board of Directors in overseeing the company's overall risk management to ensure that risk management is aligned with the company's operations. Consider the risks to stakeholders and related parties comprehensively.
13. Establish policies and guidelines for the development of corporate governance principles and oversee the management to implement and continuously develop various corporate governance policies and practices to be appropriate and consistent with the company's business. Create a system and develop guidelines for applying corporate governance principles in management to ensure sustainable growth of the organization.
14. Review the company's operating procedures to ensure compliance with anti-corruption policies/measures. Review the self-assessment form of the Thai Institute of Directors Association (IOD) to ensure that anti-corruption measures are adequate and effective.
15. Review the summary of fraud investigation results and establish preventive measures. Review internal processes for receiving whistleblowing and complaints.
16. Review and update the Audit Committee Charter to be current and appropriate to the company's environment at least once a year.
17. Perform other duties as assigned by the Board of Directors.

## The Executive Committee

The Board of Directors has appointed the Executive Committee, with the following scope of duties and responsibilities:

1. Consider and make decisions on important administrative matters as presented by the Chief Executive Officer.
2. Approve revolving credit lines not exceeding 40 million baht, non-revolving credit lines of 30 million baht, with a total credit line not exceeding 70 million baht.

## The Nomination and Remuneration Committee, The Corporate Governance Committee and The Risk Management Committee

The Board of Directors has assigned the Audit Committee to also perform the duties of the Nomination and Remuneration Committee, the Corporate Governance Committee, and the Risk Management Committee, with the following scope of duties and responsibilities:

## The Scope of Duties and Responsibilities of the Nomination Committee

1. Advise on the qualifications of candidates for election as directors of the company.
2. Advise on the qualifications of candidates for election as Chief Executive Officer/Managing Director.
3. Review the structure, size, and composition of the Board of Directors, taking into account the company's current needs and future development, and advise the Board of Directors on adjustments as necessary.
4. Place importance on evaluating the performance of the Committee and the Board of Directors and provide recommendations for improvement as deemed necessary.
5. Ensure that procedures are in place to provide shareholders with the opportunity to nominate qualified candidates for directorships.
6. In assessing the qualifications of candidates for directorships, consider whether they possess the necessary qualifications, experience, and abilities.
7. Consider the need for changes to the Board of Directors in accordance with their tenure.
8. Provide reasons for its recommendations and include any dissenting statements in such recommendations.
9. Ensure that the company complies with applicable laws and regulations regarding the appointment and qualifications of directors.
10. Establish criteria for board succession planning and the appointment of key executives, as it deems appropriate.
11. Ensure appropriate disclosure of information regarding the activities of the Nomination and Remuneration Committee.
12. Conduct an annual evaluation of its performance, duties, and ability to perform its functions.
13. To perform any other duties as assigned by the Board of Directors.

## The scope of duties and responsibilities of the Remuneration Committee

1. Review and approve the remuneration of the Managing Director and senior management.
2. Review the appropriateness of the remuneration policy.
3. Review to ensure that the disclosure of all types of remuneration complies with the requirements of relevant laws.
4. Report to the Board of Directors on the remuneration of the Managing Director (including salary, incentives, share-based compensation, and entitlement to retirement or severance pay) in accordance with the remuneration policy and consider whether any components of the remuneration require shareholder approval.
5. Review the contractual rights of the Managing Director upon termination of employment and the payments made or proposed to be made to determine whether they are reasonable and appropriate in the circumstances.

6. Submit minutes of the Remuneration Committee meetings to the Board of Directors and report on the Remuneration Committee's performance and appropriate recommendations to the Board of Directors.
7. Prepare the Remuneration Committee's report to be included in the Company's annual report, disclosing the Remuneration Committee's charter.
8. Conduct an annual performance evaluation, roles, and capabilities assessment.
9. To perform any other duties as assigned by the Board of Directors.

## The scope of duties and responsibilities of the Corporate Governance Committee

1. Oversee the Company's compliance with generally accepted principles of corporate governance and control, and maintain a corporate culture conducive to good corporate governance. Establish and maintain appropriate corporate governance policies and processes.
2. Ensure the enforcement and compliance with policies and procedures related to corporate governance approved by the Board of Directors to ensure effective corporate governance within the Company.
3. Oversee the management's assessment of the enforcement and compliance with policies and procedures related to corporate governance and report to the Board of Directors at least annually.
4. Review and report to the Board of Directors on significant matters, audit results, and recommendations regarding corporate governance.
5. Provide reasons for their recommendations and include dissenting statements (if any) in such recommendations.
6. Ensure that the Company complies with laws and regulations related to good corporate governance.
7. Provide appropriate disclosure regarding the Committee's activities and the Company's corporate governance practices.
8. Conduct an annual self-assessment of the Committee's performance, roles, and ability to perform its duties.
9. Perform other duties as assigned by the Board of Directors.

## The scope of duties and responsibilities of the Risk Management Committee

1. Consider and propose risk management policies and frameworks to the Board of Directors for approval.
2. Oversee the continuous development and implementation of risk management policies and frameworks to ensure the company has an effective enterprise-wide risk management system that is consistently adhered to.
3. Review risk management reports to monitor significant risks and take actions to ensure that the organization has adequate and appropriate risk management measures in place.
4. Oversee and support the review and assessment of the adequacy of the company's risk management policies and systems, including the effectiveness of the system and compliance with established policies.
5. Present reports to the Board of Directors' meetings on matters related to risk management, including any changes, amendments, or updates, to keep the Board informed and aware of the key risks facing the organization and factors that may impact the organization's risk profile in the future.

6. Report to the Board of Directors on risk and risk management regularly, with meetings for communication, information exchange, and coordination on risk at least twice a year.
7. Review and assess the Risk Management Committee Charter and propose any necessary amendments to the Board of Directors for approval at least once a year.
8. Perform other risk management duties as assigned by the Board of Directors.

The management/risk management working group/internal audit/external auditors must report or present relevant information and documents to the Committee to support the Risk Management Committee in fulfilling its assigned responsibilities.

## 2. Code of Conduct for Directors

The Company's directors shall adhere to ethical standards under the following principles:

### 2.1 Integrity, Fairness, and Morality

- In conducting the Company's business, directors shall act with integrity, fairness, and morality.
- Directors shall not discriminate based on differences in race, religion, gender, marital status, or physical disability.
- Directors shall not make promises or enter into commitments regarding matters that the Company does not intend to execute or is incapable of fulfilling.
- Any action taken by a director must not give rise to questions regarding their honesty and integrity.
- Directors shall remain committed to the truth and shall not cause misunderstandings, whether directly or indirectly. They shall not make false statements or actions, nor shall they create misunderstandings through the omission of speech or action.

### 2.2 Personal Business Transactions

- The personal business transactions or other business undertakings of a director must be kept entirely separate from the operations of the Company carried out in their capacity as a director.
- Directors shall not use the Company's name in conducting their personal transactions or other business activities.
- Directors shall utilize only the existing products and services of the Company, strictly in accordance with the terms and conditions prescribed by the Company.

### 2.3 Confidentiality

- Directors must ensure that confidential information regarding customers, employees, and the Company's operations will not be disclosed, either intentionally or unintentionally, to any third party, unless prior consent has been granted by the Company.
- Directors shall not utilize any information acquired in their capacity as a director for the financial benefit of themselves or others.

### 2.4 Disclosure of Interest

- Directors must immediately disclose any interests in personal business or other business activities, as well as any matters constituting a conflict of interest or that may lead to a conflict of interest, in accordance with the policies prescribed for directors from time to time.
- Directors must disclose any relationships they have with the Company in accordance with the independence policies prescribed for directors from time to time.
- Any business dealings with the Company by a director must be conducted at an appropriate level to avoid any potential or perceived conflicts of interest.

### 2.5 Compliance with Laws and Regulations

- Directors shall comply with all laws, rules, and regulations relevant to the conduct of the Company's business.

### 2.6 Acceptance of Money, Gifts, Entertainment, and Travel

- Directors must not abuse their position to seek personal benefits from business operators dealing with the Company, including those currently in the process of contacting the Company for business purposes.
- In the event that such offers are made, directors must not accept any personal benefits in an amount that exceeds what is deemed appropriate.

# 3. Code of Conduct for employee

**3.1 Scope**

- This Employee Code of Conduct applies to all personnel of the Company, including employees of the Company and its subsidiaries or other entities over which the Company has operational control.

**3.2 Compliance**

- Every employee has a duty to thoroughly understand and strictly comply with the Company's work rules, regulations, orders, and Code of Conduct, as well as all other policies, whether established by custom or in writing, and whether currently in effect or to be prescribed in the future.

**3.3 Ethical Business Conduct**

- The Company is committed to conducting its business with morality and ethics in all corporate activities. In performing their duties, employees must adhere to moral principles by acting with honesty, integrity, and fairness. Their thoughts, speech, and actions must be grounded in correctness and righteousness, and they must conduct themselves appropriately in accordance with positive societal values.

**3.4 Safeguarding the Company's Interests**

- Employees should perform their duties with honesty, integrity, morality, and responsibility, in accordance with the guidelines, policies, and regulations prescribed by the Company, while dedicating their full capabilities to their work.
- Safeguarding the Company's interests must be achieved through lawful and legitimate means. Employees shall not assist, support, or allow themselves to be used as a tool to evade compliance with any laws or regulations, in strict adherence to the principles of good corporate governance.

**3.5 Reliability of Information**

- All types of Company information must be truthful and accurate.
- Every employee shall cooperate in ensuring the accuracy of information by recording data and preparing reports correctly, accurately, and in a timely manner. All forms of Company information require accuracy, precision, and transparency.

**3.6 Confidentiality of Information**

- Employees must not disclose any Company information that has not yet been made public, except as required by law or upon receiving official approval from the Company.
- The preservation of customer data is deemed highly critical and must be strictly observed by all employees. Employees are strictly prohibited from disclosing any customer information to third parties through any means or media, except when disclosure is made to legally authorized persons or pursuant to a court order.

**3.7 Corporate Communication and Public Expression**

- The Company is committed to conducting business with honesty and transparency. All internal and external communications must be accurate, precise, straightforward, and delivered through channels appropriate to each situation.
- Any communication, publication, or announcement, both internal and external, containing untruthful, distorted, or malicious information, including information that may damage the reputation of any individual or group, is strictly prohibited, whether conveyed verbally or in writing.

**3.8 Use of Inside Information for Securities Trading**

- Employees possessing non-public inside information are strictly prohibited from trading shares or any related securities, as well as disclosing or exploiting such information for their own financial gain or that of others, whether directly or indirectly.

**3.9 Harassment**

- The Company is dedicated to creating a positive working environment that fosters productivity and is free from any form of harassment. Any reported incidents or behaviors that violate these guidelines will, if proven true, result in disciplinary action.

**3.10 Gambling, Alcohol Consumption, and Substance Abuse**

- Employees are strictly prohibited from consuming, possessing, buying, selling, or transporting illegal substances or controlled narcotics (except as prescribed by a physician).
- Consuming alcoholic beverages during working hours is strictly prohibited, except at social gatherings or customer entertainment events authorized under Company regulations, provided that such consumption does not lead to intoxication or loss of self-control.
- Employees are strictly prohibited from engaging in any form of gambling during working hours or within the Company's premises.

**3.11 Gifts, Hospitality, and Entertainment**

- Employees must not solicit or exhibit any behavior indicating, directly or indirectly, an intention to accept money, property, and/or any other benefits that may influence their business decisions made on behalf of the Company. Unless received on ceremonial occasions or in accordance with good local customs or traditions.

**3.12 Conflict of Interest**

- All employees must perform their duties with the Company's best interests as their primary consideration. They must ensure that their actions and decisions are free from any personal stake or interest that conflicts with the Company's interests. Furthermore, employees must avoid any potential conflicts of interest, whether direct or indirect.

**3.13 Anti-Corruption and Anti-Bribery**

- All employees have a duty to study and thoroughly understand the Company's Anti-Corruption Policy and strictly adhere to the prescribed guidelines.

**3.14 Company Assets**

- Every employee is responsible for safeguarding the Company's assets against loss, damage, or misuse.

**3.15 Anti-Money Laundering and Counter-Terrorism Financing (AML/CTF)**

- Employees must strictly uphold and comply with all rules, regulations, and laws concerning anti-money laundering and the prevention and suppression of terrorism financing.

**3.16 Secondary Employment and External Activities**

- Employees must not hold employment with other organizations or engage in any external activities unrelated to the Company during their designated working hours.

**3.17 Human Rights and Political Activities**

- The Company adheres to human rights as a core principle for all employees, requiring them to understand these principles, integrate them into their operations, and refrain from supporting any activities that violate human rights.
- Employees must exercise caution when expressing political opinions in the workplace, during working hours, or at any venue where such expression could be construed as acting in their capacity as a Company employee.

## 4. Compliance with Laws and the Company's Rules and Regulations

All directors, executives, and employees must strictly comply with all applicable laws, as well as the Company's rules and regulations. It is the responsibility of every individual to understand and adhere to the regulations, orders, Code of Conduct, and all other policies, whether established by custom or provided in writing.

## 5. Anti-Corruption and Anti-Bribery

The Company is committed to opposing all forms of corruption, including the giving or receiving of bribes. Consequently, all directors, executives, and employees are required to strictly adhere to the Anti-Corruption and Anti-Bribery Policy.

The Company actively communicates and promotes awareness among all stakeholders to ensure they do not solicit, accept, or agree to receive any money, gifts, or other benefits from business associates. Furthermore, they must refrain from any actions that could be construed as such, and shall not demand, facilitate, or accept bribes for the benefit of the Company, themselves, or their close associates.

All directors, executives, and employees must not solicit, accept, or agree to receive money or any other benefits from business associates. They must ensure that business operations and competitions are conducted through legitimate strategies, and are prohibited from accepting gifts or money from customers or business partners.

All directors, executives, and employees must not, directly or indirectly, offer gifts or items of value to government officials to gain business advantages, except for gifts given during traditional festivals or customary occasions, which must be consistent with the Company's standard practices for gifting to customers.

## 6. Intellectual Property

Intellectual property is a vital asset and a key tool that enhances business operations and work efficiency. Therefore, it is the collective responsibility of all directors, executives, and employees to respect the rights of intellectual property owners, refraining from any actions that could be construed as an infringement of the rights of others.

All directors, executives, and employees are responsible for safeguarding and protecting the Company's intellectual property from any infringement or unauthorized use by third parties.

## 7. Gifts, Hospitality, and Entertainment

All directors, executives, and employees must not solicit, accept, or agree to receive money, items, or any other benefits from business associates. However, gifts may be given or accepted in accordance with traditional customs, provided that such acceptance does not influence the recipient's business decisions. For further details and guidelines, please refer to the Gifts, Hospitality, and Entertainment Policy.

## 8. Conflict of Interest

All directors, executives, and employees must avoid any actions that may lead to a conflict of interest with the Company. This includes dealings with business affiliates, such as business partners or competitors and the misuse of opportunities or information gained from their position for personal gain. Furthermore, personnel must refrain from engaging in businesses that compete with the Company or taking on outside employment that negatively impacts their professional duties.

All directors, executives, and employees must exercise caution and avoid entering into any personal legal disputes, litigation, or private contracts with the Company's stakeholders or business affiliates. In cases of necessity, the individual must notify their immediate supervisor or the Board of Directors (as applicable) to obtain acknowledgment prior to taking any such action.

Directors and executives must report their interests or those of their related persons, which are associated with the management of the Company or its subsidiaries, in accordance with Section 89/14 of the Securities and Exchange Act B.E. 2535 (as amended by the Securities and Exchange Act (No. 4) B.E. 2551). This report must be submitted upon their first appointment to office and updated every time there is a change in the information.

## 9. Treatment of Stakeholders

### 9.1 Employees

The Company is committed to treating all employees with fairness and equality, while fully respecting fundamental human rights. It provides fair compensation that is competitive within the same industry and maintains a safe and healthy working environment to protect the lives and property of its personnel. Furthermore, the Company provides appropriate welfare benefits and welcomes feedback and suggestions. It has established formal channels for grievances regarding unfair treatment as well as whistleblowing for illegal acts, ensuring a fair resolution process and robust protection measures for complainants.

The appointment, transfer, rewarding, and disciplining of employees must be conducted in good faith and based on the employee's knowledge, competence, and suitability.

The Company prioritizes the development of employees' knowledge, capabilities, and skills by providing equal and consistent opportunities for all, while strictly adhering to all labor laws and related regulations. Furthermore, the Company implements personnel development and succession planning for key positions to ensure alignment with its strategic goals.

### 9.2 Shareholders

The Company treats all shareholders with integrity and ensures equitable and fair treatment for every individual. It is committed to disclosing accurate, complete, and transparent information, including future business plans to ensure that all shareholders and stakeholders stay informed. This information is provided consistently and truthfully through channels that offer equal and fair access, such as the Stock Exchange of Thailand's (SET) disclosure system and the Company's official website.

All directors, executives, and employees shall perform their duties with responsibility, due care, and integrity for the best interests of the Company. They must refrain from any actions that could result in a conflict of interest or lead to the violation or infringement of shareholders' rights.

### 9.3 Customer

The Company is committed to continuously developing the quality of its products and services. It ensures the delivery of high-quality, standardized products and services within the specified timeframe and under fair conditions. This includes providing complete, accurate, sufficient, and timely information regarding its offerings to enable customers to make well-informed decisions. The Company strictly prohibits any exaggerated claims in advertising or other communication channels that could mislead customers regarding the quality, quantity, or conditions of its products and services.

The Company maintains strict measures to protect customer confidentiality and prohibits the unauthorized use of such information for the benefit of oneself or related parties. The Company is dedicated to responding promptly to customer needs and providing efficient channels for grievances regarding product and service quality. Furthermore, it regularly monitors and measures customer satisfaction to continuously enhance and improve its products and services.

### 9.4 Partners

The Company treats its business partners with fairness, based on the principle of mutual benefit. The Company strictly adheres to all contracts and agreed-upon commercial terms and conditions. In the event that any condition cannot be fulfilled, it shall promptly notify the business partner in advance to collaboratively seek a resolution.

In all business negotiations, executives and employees must refrain from soliciting, receiving, or offering any dishonest benefits in dealings with business partners. Should there be information indicating that such dishonest benefits have been solicited, received, or offered, the Company shall disclose the details to the business partner and work together to resolve the issue fairly and promptly.

### 9.5 Debtors

The Company treats its debtors with fairness and ensures the provision of accurate, complete, sufficient, and timely information. Furthermore, the Company is committed to protecting the confidentiality of its debtors and strictly prohibits the unauthorized use of such information for the personal gain of oneself or any related parties.

### 9.6 Creditors

The Company is committed to maintaining sustainable relationships with its creditors. It is the Company's policy to treat all creditors equitably and fairly by providing accurate, transparent, and verifiable information. The Company strictly adheres to all contractual terms and conditions, including the timely repayment of principal, interest, and fees, the maintenance of financial ratios, and other specified covenants. In the event that any condition cannot be fulfilled, the Company shall promptly notify the creditors to collaboratively determine a viable resolution.

### 9.7 Competitors

The Company operates with integrity, maintains high service standards, and adheres to the principle of refraining from making disparaging remarks or distorting facts about competitors. Furthermore, the Company treats its competitors with mutual understanding and fosters constructive cooperation. The Company recognizes that other competitors share a common responsibility to provide excellent and high-quality financial services to their respective customers.

### 9.8 Community and Society

The Company focuses on instilling a sense of social and community responsibility among its executives and employees. It emphasizes fair and ethical conduct, upholding its duties toward the community and society. Furthermore, the Company consistently supports various activities that contribute to the greater good, encompassing society, the community, and the environment.

### 9.9 Regulators

The Company is committed to conducting its business with integrity, transparency, and accountability. It strictly adheres to all relevant laws, rules, and regulations, as well as the best practices established by the Stock Exchange of Thailand (SET) and the Securities and Exchange Commission (SEC).

## 10. Privacy and Confidentiality Principles

All directors, executives, and employees must maintain the confidentiality of the Company's non-public information. Such information must not be used for any unauthorized personal gain or the benefit of others. Furthermore, all directors, executives, and employees are strictly prohibited from disclosing or exploiting the Company's confidential information under any circumstances.

All directors, executives, and employees are responsible for safeguarding the Company's confidential information. Utmost care must be taken to prevent any leakage of confidential documents or news to unauthorized individuals, which could cause damage to the Company. This includes a strict prohibition on disclosing non-public information to third parties without prior authorization from the respective supervisor.

The Company is committed to safeguarding and protecting the personal data entrusted to the Company. It exercises the utmost care in handling such data to maintain the privacy of the data subjects. Personal data shall be used solely for the specific business purposes disclosed to the data subjects at the time of collection.

## 11. Work Environment

Directors and executives are expected to maintain a clean, comfortable, secure, and safe work environment. Furthermore, they shall lead and supervise their subordinates with compassion and integrity, while fostering a workplace atmosphere that is warm, supportive, and inclusive.

All employees are expected to contribute to and maintain a spirit of unity, harmony, and solidarity among colleagues. The Company is committed to creating a work environment built upon the principle of equality, without regard to differences in race, religion, culture, age, gender, educational background, knowledge, or ability.

The Company is committed to actively listening to and monitoring employee feedback regarding various organizational aspects on an ongoing basis. An annual Employee Satisfaction and Engagement Survey is conducted to understand employees' perspectives. The insights gained from these surveys are analyzed to identify opportunities for continuous improvement and to develop effective enhancement strategies.

## 12. Political Rights

The Company strictly adheres to the principle of political neutrality. The Company's management policy is rooted in integrity and full compliance with the law. It does not align itself with any political party or movement, maintaining a firm stance of political neutrality in all aspects of its business operations.

Nevertheless, all directors, executives, and employees are entitled to provide personal support to political parties, politicians, or candidates of their choice, provided that such support is not directly or indirectly associated with the Company's operations, funds, or resources. Furthermore, directors, executives, and employees are strictly prohibited from directly or indirectly influencing, coercing, or pressuring their colleagues to provide financial assistance or engage in activities that support any political party, politician, or candidate.

## 13. Respect for Human Rights

The Company is committed to upholding human rights at both national and international levels. The Company strictly ensures that its business operations are in no way involved in any human rights violations. Furthermore, the Company recognizes and adheres to global principles for the benefit of society, including: the Universal Declaration of Human Rights (UDHR), the United Nations Global Compact (UNGC), and the United Nations Guiding Principles on Business and Human Rights (UNGPs). The Company also adopts the Standards of Conduct for Business to eliminate discrimination against LGBTI people, as set forth by the UN Office of the High Commissioner for Human Rights (OHCHR). Its commitment extends to the ILO Declaration on Fundamental Principles and Rights at Work, the Core Conventions of the International Labor Organization (ILO), and the Children's Rights and Business Principles (CRBP).

The Board of Directors, executives, and employees of the Company and its subsidiaries respect human dignity and treat all stakeholder groups with equality. The Company provides equal opportunities for everyone without discrimination based on race, nationality, skin color, gender, gender identity, sexual orientation, age, religion, language, ideology, belief, social status, family background, disability, or political opinion, in accordance with relevant laws and international human rights principles. Furthermore, the Company prioritizes the protection and promotion of the rights of vulnerable and underprivileged groups who may face risks of rights violations or unfair discrimination. It is committed to conducting its business with comprehensive due diligence to prevent any human rights violations within the Company's operational processes.

## 14. Environmental Responsibility

The Company is steadfast in its commitment to environmental preservation. Consequently, the Company has established a policy to consistently engage in activities that benefit society, local communities, and the environment, both through its own initiatives and in collaboration with the public sector. Its business operations must strictly comply with all applicable environmental laws and regulations. It is the shared responsibility of every employee to adhere to these standards. To support this, the Company will actively promote environmental law awareness and ensure that all employees have a thorough understanding of their legal obligations regarding the environment.

## 15. Internal Control and Internal Audit Systems

The Company shall establish effective internal control and internal audit systems to ensure strict compliance with relevant standards and regulations. These systems operate under the regular audit of the Internal Auditor and the review of the Audit Committee.

The Company shall appoint personnel responsible for internal audit who are qualified, competent, and possess adequate knowledge of internal control and auditing practices. The internal audit function must maintain operational independence and conduct comprehensive auditing activities across all levels of the Company's operations on a regular and consistent basis.

## 16. Risk Management

The Company recognizes the vital importance of risk management, taking into account both internal and external factors, as well as potential economic, social, and environmental changes. The Audit Committee, acting as the Risk Management Committee, is responsible for defining risk management policies for the Board of Directors' approval. The Committee establishes risk management strategies and plans that align with the corporate strategy, and oversees the enterprise risk management process to ensure its effectiveness. This approach aims to mitigate business impacts, maintain competitive advantage, and fulfill the expectations of all stakeholders.

The Risk Management Working Group, comprising executives from various departments and led by the Chief Executive Officer (CEO), is responsible for implementing operations in accordance with the risk management policy. This ensures operational efficiency within the Company's risk appetite while fostering risk management as an integral part of the corporate culture. These operations are conducted under the oversight of the Board of Directors, through the screening and review of the Risk Management Committee.

All directors, executives, and employees share the duty and responsibility to perform their roles in alignment with the Company's risk management framework across all operational levels. Risk management shall be integrated as a core component of decision-making, strategic planning, operational planning, and the overall execution of the Company's business activities.

## 17. Accounting and Financial Reporting

The Company is committed to conducting its business with transparency and regard for the interests of all stakeholders. Consequently, the Management is held responsible for preparing accurate, complete, and timely financial reports, on both a quarterly and annual basis. These financial statements must be prepared in accordance with recognized accounting standards and must be audited by a certified public accountant who possesses the expertise and deep understanding of the Company's business operations.

All directors, executives, and employees are required to provide full cooperation to the certified public accountants in the preparation of financial reports. It is strictly prohibited to withhold, conceal, or misrepresent any material facts relevant to the financial statements from the certified public accountants.

## 18. Securities Trading and Inside Information

All directors, executives, and employees are strictly prohibited from utilizing inside information for their own personal gain, particularly in the trading of the Company's securities. Furthermore, they must not disclose or provide such inside information to any other person for the purpose of trading the Company's securities for that individual's or any third party's benefit.

Directors and executives are required to report their trading of the Company's securities to prevent insider trading and to avoid any allegations regarding the appropriateness of trading activities by insiders. This measure ensures transparency and demonstrates the integrity of the Company's leadership in handling material non-public information.

Directors and executives must refrain from trading the Company's securities during the period of 30 days prior to the public disclosure of quarterly and annual financial statements, and for 24 hours following such disclosure. Additionally, they must comply with any other restricted periods as may be designated by the Company from time to time. For further information, please refer to the 'Policy on Securities Trading and Holdings Reports for Directors and Executives'.

## 19. Use and Protection of Company Assets

All directors, executives, and employees are entrusted with the duty and responsibility to protect the Company's assets from damage or loss and to utilize them with maximum efficiency for the Company's ultimate benefit. Every individual must ensure that Company assets are not used inappropriately, inefficiently, or underutilized. Furthermore, it is strictly prohibited to use any Company assets for personal gain or for the benefit of others.

The aforementioned assets include both tangible and intangible assets, such as movable and immovable properties, technology, technical know-how, proprietary rights, patents, and copyrights. This also encompasses confidential information that has not been disclosed to the public, including but not limited to business plans, financial projections, and human resources data.

# Section 2: Monitoring and Compliance Oversight

## 2.1 Code of Conduct Compliance

All directors, executives, and employees are required to acknowledge, understand, and strictly comply with the Company's Code of Conduct. To ensure serious and rigorous adherence, the Company shall establish guidelines for both recognition and disciplinary action. This includes providing rewards or commendations for those who exemplify ethical conduct, as well as imposing disciplinary sanctions on those who violate the Code of Conduct, in accordance with the Company's regulations.

Regarding the oversight and monitoring of compliance, supervisors at all levels are held accountable for supervising, promoting, supporting, and monitoring their subordinates' adherence to the Code of Conduct. It is the responsibility of every supervisor to ensure that the Company's ethical standards are consistently practiced and integrated into the daily operations of their respective teams.

This Code of Conduct is considered an integral part of the Company's Rules and Regulations, with which all directors, executives, and employees must strictly comply. Any individual who violates or fails to adhere to this Code shall be deemed to have committed a disciplinary offense and will be subject to appropriate disciplinary action in accordance with the Company's policies.

The Company shall conduct a review of the Code of Conduct at least once a year to ensure its continued suitability and alignment with the ever-changing business environment.

In the event that a director, executive, or employee has doubts or encounters difficulties in understanding or complying with the Code of Conduct, or if a specific situation is not explicitly addressed herein, they should consult with relevant parties before taking any action. Every individual should exercise judgment by asking the following questions prior to making a decision: Is the action legal? Does it conflict with the Company's policies, values, or corporate culture? Is it socially acceptable and can it be transparently disclosed to the public? Will it cause damage to the Company's reputation or brand image? Does it have a negative impact on any of the Company's stakeholders?

## 2.2 Whistleblowing Channel

The Company expects all directors, executives, and employees to collectively monitor compliance with the Code of Conduct. To support this, the Company has established dedicated reporting channels for any concerns regarding violations, misconduct, or failure to adhere to the Company's ethical standards and business conduct.

The Company pledges that all information received through the Company's reporting channels will be treated as strictly confidential and will be protected with the highest level of security. Furthermore, the Company guarantees that whistleblowers will be fully protected from any form of retaliation or harassment during the investigation process and after its conclusion.

The Company is committed to handling all complaints with transparency, equality, and care, ensuring fairness to all parties involved. A reasonable and fair timeframe has been established for the investigation of each complaint. The reporting channels are available through the following three options:

1. **Email:** To the Chairman of the Board of Directors or the Chairman of the Audit Committee at *fraud@leaseit.co.th*
2. **Postal Mail:** To the Chairman of the Board of Directors or the Chairman of the Audit Committee
   **Address:** *Lease IT Public Company Limited, 1023 MS Siam Tower, 29th Floor, Rama 3 Rd., Chongnonsi, Yannawa, Bangkok 10120*
3. **Company Website:** **https://www.leaseit.co.th** under the topic "Whistleblowing, Complaint, and Feedback"

## 2.3 Disciplinary Action

This Code of Conduct constitutes an integral part of the Company's Work Rules and Regulations, with which all directors, executives, and employees must strictly comply. Any individual who violates or fails to adhere to these standards shall be deemed to have committed a disciplinary offense and will be subject to disciplinary action in accordance with the Company's regulations. The following acts are considered violations of the Company's Code of Conduct:

1. Non-compliance with this Code of Conduct.
2. Advising, promoting, inciting, or supporting any individual to fail to comply with this Code of Conduct.
3. Neglecting or failing to report a complaint upon witnessing a violation or non-compliance with this Code of Conduct.
4. Failure to cooperate, concealing information, or taking any other actions that obstruct an investigation into facts related to reports of violations or non-compliance with this Code of Conduct.
5. Unfair treatment of others resulting from filing a false report regarding a violation or non-compliance with this Code of Conduct.

Any act that violates this Code of Conduct shall result in disciplinary proceedings against the offender in accordance with the Company's Disciplinary Regulations. Furthermore, if such violation constitutes an offense under the law, the Company shall also pursue legal action against the individual to the fullest extent of the relevant laws.

This Code of Conduct (Revision No.1) was approved by the Board of Directors at Meeting No. 9/2025 on November 10, 2025, and shall enter into force as of the date of its announcement.

Announced on November 18, 2025.
Police General Jate Mongkulhutthi
Chairman of the Board
Lease IT Public Company Limited