

CODE OF CONDUCT

AMATA VN
WE KNOW BEST ABOUT VIETNAM



บริษัท อมตะ วิ เอ็น จำกัด (มหาชน)

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Definitions

Executive Directors	Board Directors, who are also appointed as an Executive of the company in which they are appointed as a Board Director.
Non-Executive Directors	Board Directors, who are not concurrently in any Executive position in the company in which they are appointed as a Board Director. Non-Executive Directors may be selected and appointed through a process in accordance with the established corporate Nominations Policy and Procedures, as well as may be a representative of a Shareholder Group.
Independent Directors	Board Directors who are not Executives in the Company in which they are appointed as a Board Director, and who possess the required 'Independence' qualifications specified by the Office of the Securities Exchange Commission (SEC).
Fraud/Corruption	Being involved in any acts of fraud and/or bribery - ie: offering, promising or actually giving bribes OR proposing or requesting bribes, accepting money or assets/items or other benefits, in an improper manner, to/from any Government/ Public Sector and Private Sector organizations/officials, business partners, customers/clients, and all other involved Stakeholders, whether in a directly or indirectly.
Giving/Accepting bribes	Offering to or accepting from others any gifts, rewards and any other personal benefits, with the intent of inducing various actions that are improper, corrupt or illegal together with any unethical business behaviors.
Giving goods or any other benefits	Giving any special privileges or benefits in the form of money, assets items, goods, gifts or any other special benefits to reward or to further building good relationships.

Conflict of interests

Undertaking any activities or actions with the intent of achieving any personal benefits or benefits for other parties, who are related by blood or by other means, so as to gain the power of influence in any involved decisions or to interfere, hinder and obstruct the best benefits of the Company.

Ethics/Moral Principles

The principles held in high esteem by other people or society as a whole, which help and form a basis for making any decisions and for behaving in a personal capacity.

Ethical Behaviors

Positive ethical behaviors, based on popular or accepted traditions and special festivals/events; or various activities relating to any important long-held social customs and traditions.

1. Message from the Chairman of the Board and the CEO

AMATA VN PCL has and upholds the principle of operating its businesses with good moral principles and standards, through being committed to being responsible and fully accountable to all Stakeholders, giving importance and being committed to conducting the Company's business in a fully transparent and honest manner together with strictly adhering to all legal and regulatory requirements in accordance with the principles of good governance and good business ethics. As such, the required uniform standards of behavior, on the part of all Company Staff together with all Board of Directors and Members of the Management Group, have been defined in regards to conducting its businesses and their behavior within the framework of acting with good moral standards, honesty and integrity. The Company recognizes that, apart from the negative effects on its business operations, its reputation and its corporate image, fraudulent actions and of acts of corruption will also be a major obstacle for the Company's sustainable growth as well as for the overall development of the country.

In its capacity as a business operator and part of the wider society, as well as in the hope of Thailand being rid of corruption, the Company joined the Private Sector Collective Coalition Against Corruption (or the CAC - Collective Action Coalition) in fighting all forms of corruption; and also established its 'Anti-Corruption Policy and Measures' that is one of core components of the Company's "Code of Ethics in Conducting the Business", which are operating guidelines that must be adhered to by all Company Staff in undertaking their activities, and also for informing all involved Stakeholders about the Company's overall intent and business operating framework.

On behalf of the Company's Board of Directors and Executives, all Board Directors, Members of the Executive and Management Group and Company Staff, at all levels, are requested to study and achieve a full understanding of this "Code of Ethics in Conducting the Business", and to act in strict accordance with this Code of Business Ethics. This is so that we can all join together in developing the Company into a transparent organization, so as to receive the full trust and confidence from all Stakeholder groups; whereby this will be a core foundation for the Company's businesses operations together with its ongoing sustainable growth.

Dr. Surin Pitsuwan
Chairman of the Board

16 February, 2017

Mrs. Somhatai Panichewa
Director and CEO

16 February, 2017

2. Code of Ethics in Conducting Business

2.1 Business Operations Guidelines

The Company's Board of Directors promotes the creation of business sustainability and maintaining overall benefits for all Stakeholders and society as a whole, as well as fully supports allowing all Stakeholders the opportunity to express their opinions or comments regarding the business operations undertaken by the Company. This will be a mechanism and procedure to oversee that business activities are being undertaken in a genuine manner, in order to drive the organization in achieving real and effective good corporate governance practices, through having in place these core principles and procedures:

- 1) Strictly adhering to all associated and applicable rules and regulations,
- 2) Complying to the Company's established policies relating to: "Corporate Governance" and "Code of Business Ethics",
- 3) Being committed to conduct and operate its businesses in a fully transparent, honest and equitable manner,
- 4) Adhering to the principles of acting as 'good corporate citizen' through instilling positive awareness and mindfulness into its employees and Staff,
- 5) Taking into consideration both the overall benefits and possible negative effects, resulting from the Company's business operations for society as a whole and for all Stakeholders in an equal and equitable manner,
- 6) Operating its businesses in a responsible manner, together with protecting and maintaining the overall benefits for all Stakeholders and society as a whole,
- 7) Establishing and implementing stringent operating systems and procedures, so as to prevent any possible fraudulent or corrupt actions from occurring without being detected by the Internal Audit process,
- 8) Requiring all Board Directors, Executives and Management group members together with all Staff members within the organization to actively participate in undertaking anti-corruption practices, in reporting any conflict of interests situations, in communicating in an effective and efficient manner, and in promoting the quality of their working lives,
- 9) Allowing all Stakeholders the opportunity to make use of effective channels of communications to propose or submit any complaints, information and suggestions; as well as genuinely listening to such inputs and opinions together with having in place various measures to protect any complainants or informants/whistle-blowers.

2.2 Anti-Corruption Policy

All Board Directors, Executives, Management Group members and all Company Staff in every Business Unit are forbidden to solicit, request, undertake or accept all forms of corrupt practices/actions relating to any involved Public Sector and Private Sector organizations located in any country/market where the Company operates its businesses. They are also requested to jointogether in promoting the values of 'honesty', integrity and 'responsibility' as the core corporate

values of the Company. As such, this Anti-Corruption Policy incorporates and covers the key principles in operating the Company's businesses as follows:

- 1) The Company undertakes an assessment of all key business-related risks regarding possible internal acts of fraud and corruption within the Company; and has established the required associated operating measures relating to any such perceived risks as well as in accordance with the overall internal controls system and procedures.
- 2) The Company establishes various associated working procedures that can be adequately applied and put into practice, in accordance with the abovementioned policy, that are sufficient to be able to protect and prevent against any fraud or corruption from occurring within its business operations.
- 3) The Company holds an orientation program and training for its Staff, in order to inform, educate and achieve a full understanding, on their part, of the Anti-Corruption Policy and principles together with the associated measures and operating procedures.
- 4) The Company establishes an internal controls system, in order to ensure both the effectiveness and efficiency of the Anti-Corruption Policy, that includes various procedures relating to the collection and recording all financial and accounting information and the human resources management processes together with other key operational procedures and processes of the Company.
- 5) The Company establishes procedures to report on as well as to monitor and review compliance to the established Anti-Corruption Policy together with various appropriate operating procedures, in order to ensure that such policy and associated procedures are adequate, comprehensive, timely and relevant to the latest current situations.
- 6) The Company establishes effective and secure channels of communications for use by the Company's Staff and any other Stakeholders to request for recommended actions as well as to submit any complaints or information relating to any fraudulent actions or acts of corruption, together with various measures to protect the complainant or informant.
- 7) The Company undertakes to disseminate and communicate details of its Anti-Corruption Policy – both internally within and externally outside the Company, in order to effectively achieve full and comprehensive compliance to the established Anti-Corruption Policy within the Company and all Subsidiary Companies, Joint Venture Companies, or Companies in which the Company has a controlling interest as well as any business representatives/agents, who can also apply and act in accordance with this established Company-wide policy.
- 8) The Company promotes the exchange of ideas, knowledge, working experiences, and best practices between the Company and other Companies within the same industry sector as well as between all involved Stakeholders, in order to be part of the 'Collective Coalition' in undertaking any anti-corruption actions, that has been

established by the Company, together with the Chambers of Commerce or any other involved regulatory authorities.

2.2.1 Associated Operating Procedures

In order to prevent and protect against the risks of possible corruption that may occur within the Company, all Board Directors, Executives and Management group members, and Company Staff are required to act in accordance to and strictly comply with these associated policies and procedures:

1) Policy on accepting or giving gifts, acts of hospitality (entertaining) or other benefits

Receiving or giving of gifts, acts of hospitality (entertaining) or any other benefits are permitted; whereby this must be done in the following manner:

- 1.1) It must be done in a proper manner, openly and transparently, without violating any business ethics and also in a legal manner; as well as must comply to the associated rules or regulations of the Company and those of any involved Government and State Enterprise organizations/agencies.
- 1.2) It must be done in an appropriate manner or in accordance with appropriate situations and festive occasion, that are accepted traditions and customs relevant to each local country and market.
- 1.3) It is not to be used as an excuse or opportunity for undertaking any act of corruption.
- 1.4) It does not lead to or involve with any conflict of interests situations between any involved individuals' personal benefits and those of the Company.
- 1.5) Receiving or giving of gifts, acts of hospitality (or entertaining) or any other benefits are NOT permitted in the event that such actions have any possible impacts on the Company's business operations.

2) Policy on giving all forms charitable donations or corporate sponsorships

Such actions must be done in the following manner:

- 2.1) It must be done properly, openly and transparently, without violating any business ethics, and in a legal manner, as well as must comply to the associated and applicable rules or regulations of the Company and those of any involved Government and State Enterprise organizations and agencies.
- 2.2) It must be done in accordance with the relevant policies relating to society, communities and the environment, or with any associated activities, or in order to promote sustainability for the Company and/or to achieve real social benefits.
- 2.3) It must not be used as an excuse or opportunity to undertake any acts of corruption.
- 2.4) There must be no hidden agenda, aimed at creating any improper advantage or at facilitating any improper business-related benefits.
- 2.5) It must not create any conflict of interests situations between any involved individuals' personal benefits and those of the Company.
- 2.6) A written official request must be submitted –together with clearly documented details of the objective of the request, the name of the intended recipient (ie: a person or a business entity) of the requested charitable donation or sponsorship –

for formal consideration and prior approval by the appropriate authority within the Company before such donation/sponsorship actions are undertaken.

3) Policy on participating in any political activities

- 3.1) The Company is politically 'neutral', and does not have a policy to give any political support to any party/person, or to undertake any actions that indicate an alignment with or preference towards any particular political party or political group.
- 3.2) The Company's Staff, based the constitutional and other applicable laws, has the political freedom and right in a personal capacity – such as, exercising their rights to vote in any elections.
- 3.3) The Company Staff must not use or make use of any Company assets and/or perform any services, in the name of the Company, in support of any political activities; or must not undertake any actions that imply that the Company is, in any way, involved with or supports any particular political party or political group.

As such, so that these anti-corruption measures will be fully adhered to and complied with throughout the Company, as well as so that associated supporting anti-corruption procedures are established in an adequate manner – such as, appropriate review procedures for various activities relating to sales and marketing, purchases and sales of land assets, purchasing and procurement, human resources management, accounting and finance – through establishing internal Company operating procedures together with having in place an adequate internal controls system, that are aimed at effectively protecting against or preventing the occurrence of any corrupt actions and practices.

4) Procedures for documenting and safekeeping information

The procedures for documenting and safekeeping of all financial and accounting information of the Company, which must be done in a correct, accurate, comprehensive and fully transparent manner; as well as such records must be able to be reviewed and audited, based on the established internal controls system and internal audit procedures that are both effective and credible under the oversight responsibility of the Audit Committee.

As for the operating guidelines and procedures in regards to documenting and safekeeping of such financial records, they must be in accordance with the established business ethics and corporate governance policy together with the various announced applicable regulatory policies and requirements.

5) Communications and Training

5.1) Communications

- 5.1.1 Undertake to disseminate and communicate information regarding the Anti-Corruption Policy and associated measures to all Stakeholders – namely: Board Directors, Executives and Management

Group members and all Company Staff , as well as Subsidiary Companies, Joint Venture Companies, other Companies in which the Company has controlling interests, Business Representatives/Agents, and Business Partners.

- 5.1.2 Disseminate and communicate information regarding the punishment penalties to be imposed in the event of non-compliance to the established Anti-Corruption Policy and associated measures; together with communicating the policy that there will be no punishment, demotion of employment position and rank/status of any Board Directors, Executives and Management group members, and Company Staff if they decline to undertake any acts of corruptions, even if it results in possible loss of business opportunities for the Company.
- 5.1.3 Undertake to publically disclose any relevant information regarding the Company's Anti-Corruption Policy and any associated measures.

As such, whenever any new or revised Anti-Corruption Policy and associated measures, this information will also be disseminated and communicated to all relevant parties through the established and appropriate channels of communications – ie: by post, email, website posting, printed materials, and PR posters.

5.2) Training

- 5.2.1 Undertake to hold orientation programs and training on the Anti-Corruption Policy and associated measures for all Board Directors, Executives and Management group members, and Company Staff.
- 5.2.2 Support Board Directors as well as Executives and Management group members to actively participate in informing and educating all Company Staff, so as to be a positive role model in fully adhering to the established Anti-Corruption Policy and associated measures.

6) Oversight to ensure full compliance

In order to ensure that the established Anti-Corruption Policy and associated measures are fully adhered to and complied with throughout the organization, as well as are subject to effective oversight and clearly defined control measures, the Company has defined the respective related responsibilities of specific individuals and/or Business Units/Departments within the organization as follows:

The Board of Directors:

- 1) Undertake to define and establish an Anti-Corruption Policy together with associated measures, that are both timely and appropriate to the current operating situation and risks environment through being regularly reviewed at least once a year.

- 2) Define and establish the scope and adequate coverage of the various anti-corruption mechanisms and control measures to effectively support and oversee that the Company operates in accordance with such established measures and controls.
- 3) Consider and review the relevant reports on the operations being in full accordance with the established Anti-Corruption Policy as well as the associated mechanisms, measures and controls.
- 4) Consider and review any urgent issues relating to corrupt actions, in order to oversee and ensure that timely actions are taken in response to the situation.

The Audit Committee:

- 1) Review and audit the established internal controls system and Internal Audit procedures together with the fraud and corruption related Risk Assessment Process, so that they are both adequate and effective.
- 2) Review the report relating to the compliance of all operational activities to the established Anti-Corruption Policy and associated measures.
- 3) Review any urgent issues or problem relating to corrupt actions, in order to oversee and ensure that timely actions are being taken in response to the situation.

Executive and Management Group:

- 1) Establish and implement various mechanisms and procedures relating to the established internal control system that will support the operational activities to fully comply with the Anti-Corruption Policy and associated measures.
- 2) Submit reports on urgent corruption-related issues or problems (if any) to the Audit Committee and the Company's Board of Directors.
- 3) Prepare reports, on a regular basis, on the outcome of any audits of the operational activities' compliance to the Anti-Corruption Policy and associated measures to the Audit Committee and the Company's Board of Directors.
- 4) Support and encourage all subordinates, at every level, to recognize and be fully aware of the importance of compliance to the Anti-Corruption Policy and associated measures.

Human Resources and Administration Departments:

- 1) Establish and implement human resources management procedures that reflect the Company's overall commitment to fully complying with the established Anti-Corruption Policy and associated measures.
- 2) Effectively disseminate and communicate the Company's Anti-Corruption Policy and associated measures to all involved Stakeholders.
- 3) Follow-up on and collect, from all persons within the Company, their signed form of acknowledgement of and agreement to fully comply with the Company's Anti-Corruption Policy.

Internal Audit Department

- 1) Review the internal controls system and the Internal Audit procedures together with the risks assessment process relating to fraud and corruption, prior to reporting the outcome of such reviews to the Audit Committee; as well as monitor and provide feedback on any required follow-on actions to be undertaken by the involved Departments, in order to ensure that the Management Group has already implemented any suggested corrective actions and improvements.
- 2) Prepare reports on the operational activities' compliance to the Anti-Corruption Policy and associated measures for submitting to the Audit Committee.

Office of the Company Secretary:

- 1) Coordinate associated activities in exchanging relevant knowledge among the various Business Departments, in order to make use of these ideas to further develop anti-corruption policies and practices.
- 2) Coordinate as well as communicate the scope and coverage of the various associated measures, so as to enable the involved business operating units to implement and put them into practice.
- 3) Offer any relevant initial recommendations regarding the Anti-Corruption Policy and associated measures, together with coordinating or discussing with various other operating Departments that may need to be involved in giving further relevant comprehensive and clearly defined recommendations or inputs.

7) Punishment & Penalty

The established Anti-Corruption Policy and associated measures are considered to be a core component of the overall required operations and working discipline for all Board Directors, Executives and Management group members and Company Staff. Those who do not fully comply with the established discipline and applicable Company's rules and regulations, Committee Charters and associated legal requirements, will be subject to investigations as well as to possible disciplinary punishment and even summary termination of employment.

At the same time the Company will not demote, punish or treat in any negative manner whatsoever, those Board Directors, Executives and Management group members, and any Company Staff who decline to act in any corrupt manner, even if such a decision may lead to any loss of business opportunities for the Company.

2.3 “Whistle-Blower” Policy

In order to allow the opportunity for Company Staff or any external Party to submit a complaint regarding any operational actions undertaken within the Company, that they suspect as being illegal, non-compliant with the established Company rules and regulations or business ethics and that may possibly lead to financial losses and even loss of reputation, it has resulted in the subsequent ‘whistle-blower’ related actions have been undertaken.

2.3.1. Scope and coverage of ‘whistle-blower’ actions:

- 1) Any behavior resulting from any improper actions undertaken and aimed gaining any benefit in an inappropriate and illegal manner, including actual embezzlement of company assets, as well as any fraudulent and corruption actions or bribery.
- 2) Any behavior involved with fraudulent or false book keeping and recording of the Company’s accounts or financial statements, with the intent of misleading others, through using of false financial information or not disclosing all such information that should otherwise be disclosed.
- 3) Any behavior involved with the business operations and activities, that violate any applicable laws or regulatory requirements, together with any Company rules, regulations and business ethics.

2.3.2. Applicable procedures to be undertaken in the event of receiving ‘whistler-blower’ complaints or information

The Board of Directors has established specific applicable procedures to be undertaken in the event that any ‘whistle-blower’ information or complaint is received, as follows:

- The receiver of the information or complaint is required to forward the information received to the ‘Complaints and information reports Coordinator’ – namely, the Head of the Compliance Unit/Head of the Human Resources Department -, who will then compile, screen and analyze/review all actual relevant facts, together with reviewing all the relevant documentations/evidence and degree of seriousness of the incident, as well as then assess the extent of the possible losses or damages resulting from the complaint or reported incident in question. All such compiled information is then to be submitted to the Good Corporate Governance Committee - if the complaint or reported incident is within the (abovementioned) ‘Whistler-Blower’ actions scope No.1 and No. 2; while if the complaint or reported incident falls under the (abovementioned) ‘Whistler-Blower’ actions scope No.3, the compiled information is to be submitted to the Audit Committee.
- The Corporate Governance Committee or the Audit Committee, as applicable, will then appoint an ad hoc Working/Investigation Committee, as appropriate, to join the Audit Committee in investigating the actual and true facts in detail, in order to reach a conclusion. As such, members of the appointed Working/Investigation Committee must in no way have any personal vested interests in the complaint or reported incident in question.

- In the event that that reported complaint or incident involves any members of the Executive or Management group or any Heads of a Business Division/Department level or higher, including the Company President/Managing Director(s) and even any Board Directors, then the Company's Board of Directors itself will appoint the Working/Investigation Committee to undertake the investigation of the true facts, as appropriate.
- Timeline for undertaking review/investigation activities
 - 1) The recipient of the reported complaint or incident is required to submit all facts regarding the reported complaint or incident to the 'complaints and information report Coordinator' within 3 (three) working days from the date of the receiving the report from the complainant/informant.
 - 2) The 'complaints and information report Coordinator' is also required to review and forward, with 3 (three) working days, a summary analysis of all the relevant facts to the Good Corporate Governance Committee or the Audit Committee, as applicable, in order the Working/Investigation Committee can be appointed as applicable. As such, the Working/Investigation is required to complete its investigation and consideration of the reported complaint or incident within 60 (sixty) working days from being assigned to investigate or receiving the facts on the matter.
 - 3) However, in the event that either the Working/Investigation Committee is not able to complete its investigation of the true facts or its consideration of the reported complaint or incident in this timeline, then it can request for an extension for its ongoing investigations from the Good Corporate Governance Committee or the Audit Committee- as applicable in its respective capacity as being the authorized party to appointed the Working/Investigation Committee.
- Giving feedback of the investigation results to the reported complainant or incident: The 'complaints and information report Coordinator' has the responsibility of giving feedback of the end result and conclusion of the matter in question to the original recipient of the reported complaint or incident, to the complainant/informant, and also to the person/party about which the reported complaint or incident was made.

2.3.3. 'Whistle-blower' protection procedures for the complainant or informant

- 1) The complainant or informant (or 'whistle-blower') can choose not to disclose his/her identity in the event that he/she sees that there might be some personal negative impacts in doing so. However, the whistle-blower is required to clearly disclose all the actual facts, together with concrete evidence/information relating to the incident being reported, based upon which it was sufficient to suspect the occurrence of an alleged wrongdoing and illegal act, or the alleged breach of any applicable laws, any Company rules and regulations, and business ethics, as well as of the alleged fraudulent activities and/or some form of corrupt action. However, if

the whistleblower chooses to disclose his/her identity, it will facilitate the recipient (of the complainant or information) to undertake the required actions more quickly.

- 2) All Company-related information are considered 'confidential', and will only be disclosed as necessary, through taking into consideration the overall safety and possible negative effects on the 'whistle-blower' as well as the sources of information or all involved persons. As such, all those persons responsible for undertaking the various stages of the established procedures are required to maintain strict confidentiality of the associated information, and to not disclose any information to other Parties; whereby any breaches of this required confidentiality, on the part of such persons involved, will be considered as a gross breach of discipline and punishable in accordance with the Company's regulations.
- 3) In the event that 'whistle-blowers' see that it will be unsafe for them personally or they might face personal problems or damages, they can request the Company to implement various measures to protect them as appropriate and necessary. Alternatively, in the event that the Company believes that there may be possible personal safety issues, problems or damages to the whistle-blower, the Company itself can implement such protective measures.
- 4) The Company will then undertake the required procedures relating to the reported incident in an equitable manner towards the whistle-blower who is a Company staff; whereby the Company will not make any changes to the current assigned position and responsibility or place of employment of the Staff, as well as will not threaten, violate the rights, not terminate the employment of that Staff member or will not undertake any inequitable actions against that Staff member. Similarly, if the whistle-blower is an outside person or Party, the Company will investigate and review the reported incident in a fully transparent manner, through treating all involved Parties equally in the same manner. This is in order to assure and ensure the whistle-blower their confidence that the investigation procedures will be undertaken in a fully equitable manner.
- 5) In the event that the complainant or the informant dishonestly reported the 'alleged incident', or should it be proven subsequently that the report was made with the intent of causing some damage or intentionally made with false facts, then, if it is a Company Staff member, he/she will be subjected to punishment in accordance with the established Company rules and regulations. However, if it is an outside person/party and the false report resulted in some damages for the Company, then the Company will consider taking legal action against the person/Party in question.

2.3.4. Channels of communications available for use by the Whistle-Blower

When coming across any suspicious and alleged incident of illegal activities or non-compliance with the established Anti-Corruption Policy and associated measures, all Board Directors, Executives and Management group members as well as Company Staff have the duty to report and inform the Company of such suspicions of any wrongdoings through these established and available channels of communications and following contact details:

- The Company's Chairman of the Board of Directors,

- Chairman of the Audit Committee,
 - CEO,
 - Company Secretary
-
- **The Company's Chairman of the Board of Directors**
Dr. Surin Pitsuwan
 - Telephone : (02) 792-0000
 - Email : surin.p@amata.com
 - Mail : Dr. Surin Pitsuwan
The Chairman of the Board
Amata VN PCL
Post Office Box 7 - Por Nor Fhor,
Monterey Tower, Bangkok 10310
-
- **Chairman of the Audit Committee**
Mrs. Ajarie Visessiri
 - Telephone : (02) 792-0000
 - Email : ajarie.v@amata.com
 - Mail : Mrs. Ajarie Visessiri
Chairman of the Audit Committee
Amata VN PCL
Post Office Box 7 - Por Nor Fhor,
Monterey Tower, Bangkok 10310
-
- **CEO**
Mrs. Somhatai Panichewa
 - Telephone : (02) 792-0000
 - Email : somhatai.p@amata.com
 - Mail : Mrs. Somhatai Panichewa
CEO
Amata VN PCL
Post Office Box: 7 Por Nor Fhor,
Monterey Tower, Bangkok 10310
-
- **Company Secretary**
Mrs. Varaporn Vatcharanukroh
 - Telephone : (02) 792-0004
 - Email : cs@amata.com
 - Mail : Mrs. Varaporn Vatcharanukroh
Company Secretary
Amata VN PCL
Post Office Box: 7 Por Nor Fhor,
Monterey Tower, Bangkok 10310

In the event of reporting an alleged incident on an urgent basis, then all Board Directors, Executive and Management group members, and Company Staff have the duty to inform, for acknowledgement, a Senior Executive or a Board Director directly.

As such, the conditions for considering any complaints/information from whistle-blowers, together with the procedures to protect the rights of any Company Staff, and employees or other persons/Parties contracted to work for the Company are to be in accordance with the established business ethics as well as corporate governance policies and practices of the Company. As for any other Stakeholders, they can also report any alleged incidents of wrongdoings together with associated information through the same channels of communications as stated above abovementioned.

Request for suggestions/recommendations

If any Board Director, Executives and Management group members, and Company Staff or Stakeholders has any queries or questions on the above matter, and wishes to seek some recommendations relating to the Company's Anti-Corruption Policy together with its associated mechanisms and measures, and ask for some initial suggestions or recommendations, they can do so by contacting:

- The Office of the Company Secretary
 - Telephone : (02) 792-0004
 - Email : cs@amata.com
 - Mail : The Company Secretary,
Amata VN PCL
2126 -Kromadit Building, Floor 2, New Petchburi Road,
Huay Kwang, Bangkok 10310

3. Code of Ethics for the Board of Directors

So as to underscore the Company's intent to conduct its businesses transparently with moral principles and integrity as well as to being responsible to all its Stakeholders in a professional manner, the Company has defined best practices guidelines for its Board of Directors, which are considered as the required business ethics in discharging their duties, as follows:

1. Undertake their duties and responsibilities in compliance with all applicable legal and regulatory requirements, as well as in accordance with the various Company regulations and resolutions of the Shareholders Meetings.
2. Manage the Company's business in an honest and politically neutral manner together with strict impartiality and full independence in regards to all decisions made and actions taken.
3. Delegate appropriate and full authority to the Management group for the day-to-day management and operations of the Company, free of any undue interference or detailed instructions - without any good reasons to do so.
4. Have no personal vested interests in the business activities of the Company or in any other businesses that compete with the Company whatsoever - whether directly or indirectly.

5. Avoid any situations of conflict of interests between those of the Company and their personal interests, in order to achieve overall maximum management effectiveness.
6. Undertake the management of the Company with all due care and without creating any personal obligations, that may later conflict with their required duties and responsibilities.
7. Not to seek any improper personal benefits, whether directly or indirectly, in working for the Company.
8. Discharge their duties to the fullest of their ability, in order to achieve maximum interests or benefits for the Company.
9. Not to undertake any actions that may result in a reduction of the achievable maximum benefits for the Company; or not to act in any way that would favor and afford benefits for other persons/Parties or legal entities.
10. Be committed to protect and prevent as well as stamp out any possible fraudulent acts or corrupt practices; whereby such (anti-corruption) actions must be undertaken in a speedy and decisive manner so as to establish a positive corporate value for and image of the Company.

4. Business Ethics Towards Stakeholders

4.1 Policy on the Treatment of the Community, Society and the Environment

The Company is part of the wider society; and as such, it has the obligation and responsibility to develop the local community and society as a whole. Therefore, the Company has a policy to give great importance to the overall quality, safety, vocational health and well-being, and also the overall environment of the community and the wider society, through being focused on achieving the development of the community and society, fostering and promoting religious beliefs, and creating in a positive manner, as well as on preserving the natural resources together with supporting the education of the younger generation and promoting public activities that will benefit the community as a whole. This is in order to strengthen the local community for the greater good of society as a whole, and also to create a good and clean environment, in order to enable the Company to grow in a sustainable manner together with the overall development of the wider society.

- 1) The Company is committed to actively participating, on a continuing basis, in being responsible towards society in regards to the overall quality, safety, vocational health and well-being, and the environment, together with making effective use of the natural resources to achieve maximum benefits, through recognizing the importance of the environment and the safety of all involved Stakeholders; and in supporting all social activities aimed at both preserving the environment and developing the overall quality of life for the community, based on the principles of sustainable development.

- 2) The Company continuously instills an ongoing awareness and mindfulness, on the part of its Staff at every level, in being responsible towards the wider society as well as the environment.
- 3) The Company wishes to play a part, on a regular basis, in developing society and the environment in a more creative and positive manner; whereby such joint activities are appropriate and will genuinely benefit the community, society as a whole, and also the environment. In choosing to make any charitable donations, relevant information must be assessed regarding the intended recipient, in order to ensure that such donations will be used in an effective and productive manner as well as will achieve real and concrete benefits.

Undertaking activities relating to Corporate Social Responsibility

The Company is well aware that 'society' as a whole is an important component in facilitating as well as promoting the ongoing and further stable growth of Company's businesses, whereby this starts with a small internal social circle within the Company – namely its Staff, which forms an important core community - supporting the achievement of its potential capacity and ongoing capability to being able to effectively compete at the local community level and then also eventually at the a national level, through undertaking various targeted activities as follows:

4.1.1 At the organization level

- Developing the overall skills of its Staff at all levels, and creating an internal knowledge-based organization within the Company through effective management of their capabilities;
- Promoting and supporting its Staff to actively participate in expressing their ideas relating to the Company;
- Promoting and supporting its Staff to actively participate in the ongoing development of the community.

4.1.2 At the community level

- Preserve and protect natural resources and the environment;
- Promote and develop the overall quality of life;
- Promote education as well as learning and development of the younger generation within the community;
- Promote both learning about and giving attention to local culture, good moral principles and dharma, so that these principles will become the core foundations for the ongoing development of a better quality of life for the younger generation.

4.1.3 At the national level

- Support various activities aimed at preserving and protecting the environment;
- Support the development of knowledge and learning, together with the establishment of an awareness or mindfulness in being responsible for the younger generation's social circle.

4.2 Policy on the Treatment of Shareholders

The Company realizes that its Shareholders are the true owners of the Company's businesses, and that, in the long term, its duty is to create added-value for the Shareholders. As such, the Company requires that all Board Directors, Management Group members and Company Staff act in the following manner:

- 1) Discharge their respective duties responsibly with all due care, honesty and integrity, through making all decisions in an appropriate and reasonable manner based on the available information, that they believe to be adequate, and without any personal vested interests- whether directly or indirectly, for the maximum benefit of the Company with all good and appropriate intentions and without any personal conflicts of interests with the Company.
- 2) Act in full accordance with all applicable laws and stated objectives, as specified in the Company's regulations and resolutions of the Shareholders Meetings; and undertake all activities in full compliance with the established operating guidelines as specified by the principles and practices of good corporate governance and code of business ethics, for the overall maximum benefit of the Company's Shareholders.
- 3) Oversee and ensure that the value of the Company's assets do not deteriorate or are lost in an improper manner; and establish both an internal controls system and risk management procedures that are appropriately effective and efficient.
- 4) Create the opportunity for Shareholders to be able to actively participate in as well as to contribute their ideas to the overall governance and conduct of the Company's business operations.
- 5) Report on the current status and situation of the Company on a regular basis, as well as in a truthful, comprehensive and timely manner.
- 6) Disseminate news and communicate Company-related information, that are accurate in accordance with the actual facts, in an adequate manner to all Shareholders on an equal basis and at appropriate times, in order to facilitate them to make their decisions accordingly.
- 7) Oversee and ensure that Executive Directors and Company Staff do not seek any personal benefits and gains for themselves or for any other involved Parties, through giving to others any confidential and internal Company-related information that has not yet been disclosed to the general public, and/or that they do not undertake any actions that will create any personal conflict of interests situations with the Company.
- 8) Establish effective channels of communications – including websites, mail, or telephone calls - that will allow whistle-blowers/informants to submit various complaints or information on any alleged acts of corruption, together with the associated procedures to respond to and protect the safety of any informants/complainants and including a process to provide eventual feedback, in a systematic and equitable manner.

4.3 Policy on the Treatment of Company Staff

Each and every Company Staff member is the most important component of the Company's business operations. As such, great importance is given to all Staff members, without any prejudice, bias, favoritism or preferential treatment whatsoever; whereby the Company promotes achieving unity among all Company's Staff members, as well as giving mutual polite treatment and mutual respect for each other's dignity as fellow human beings. The Company has also established a positive, safe and secure working environment; and offers Staff compensation that are appropriate together with other Staffwelfare benefits; as well as makes available the appropriate supporting technology and work tools, so that the Staff can perform their tasks for the maximum benefit of the Company.

- 1) The Company treats all of its Staff members in the same and equal manner, without any prejudice, bias, favoritism or preferential treatment based on place of birth, nationality, gender, age, race or skin color, religious beliefs, physical disability, social status, family name, type or place of education, and any other personal traits or status that are not directly related to the undertaking the assigned work.
- 2) The Company gives equal opportunity for its Staff members to fully demonstrate their respective capabilities, through offering appropriate remuneration accordingly to create the required motivation for achieving their best performances in the form of monthly compensation/salary, bonus and any appropriate work-related expenses in accordance with established Company regulations, together with both immediate and long term training courses.
- 3) Company Staff members are required to discharge their duties and responsibilities to the best of their abilities, together with positive mindfulness, honesty, integrity and fairness; as well as to be fully committed to possessing good moral principles and ethical behaviors and to always act in a responsible manner.
- 4) Company Staff members are required to undertake their work in accordance with the established lines of reporting, receiving orders from and reporting to their respective direct Superior/Supervisor, without overstepping any established lines of reporting. All Staff members can make full use of the available physical resources, labor resources together with work facilities, tools and other amenities provided by the Company for their assigned work activities. However, they are not allowed to make use of such resources and facilities or amenities for any purposes other than in discharging their assigned duties and responsibilities or in making use and exercising their rightfully entitled welfare benefits.
- 5) Company Staff members are required to behave in a polite manner, to dress properly as appropriate to the occasion, and to act with the appropriate responsibility towards their assigned duties and work responsibilities; as well as not to act in any way that will have a negative impact on the overall image of the Company.

- 6) Company Staff members should fully cooperate and participate in all Company activities aimed at creating overall positive unity within the organization, and including any other activities undertaken by the Company for wider social benefits.
- 7) The Company promotes and supports the use or display of any entitled employee rights that are in accordance with established labor laws and regulations – with the exception of those activities considered as being illegal.

4.4 Policy on the Treatment of Customers/Clients

The Company has the highest standards for its products, as well as for the safety and quality and the integrity of its operations, in order to achieve maximum customer satisfaction. The Company also conducts its business with good moral ethics, together with providing easy and convenient access to its services; as well as respects the dignity and individuality of each and every customer/client. As such the Company will:

- 1) Treat every client on an equal basis and in a uniform manner, based on achieving mutually equitable benefits for both sides.
- 2) Disseminate news and disclose relevant information relating to its services and products, together with correct recommendations, to all customers/clients in an adequate and timely manner.
- 3) Strictly adhere to and act in full accordance with all the terms and conditions as agreed with its customers/clients. In the event that it is not able to do act in accordance with any terms and conditions, the Company will then inform the customer/client immediately in order to mutually discuss and agree on any required actions to resolve the issue(s).
- 4) Treat all customers/clients in a polite manner, as well as create full confidence and trust on the part of its customers/clients.
- 5) Respect the respective individual rights of all customers/clients, as well as treat all customer-related information with strict confidentiality and will not disclose any such information to other external Parties.
- 6) Establish procedures and processes to enable customers/clients to submit any complaints relating to the quality of its products and services, to respond to their needs and to operate its business to the best of its ability. This is to enable its customers/clients to receive quick and speedy response to their requirements/needs.
- 7) Support all activities aimed at both promoting and maintaining continued good business relationships between the customers/clients and the Company.

4.5 Policy on the Treatment of the Process in Sourcing of Goods and Materials and on the Treatment of Business Partners/Operators

The Company places great importance on the sourcing and purchasing processes for its goods and materials, which are essential in supporting the Company's business

operations; whereby these processes are undertaken within the framework of good corporate governance policies and practices, as well as are subject to strict oversight and monitoring.

The Company also places great importance to other business operators/business partners, through treating all of them in an equal manner, based on equitable and transparent principles of fair competition for the sake of establishing mutually positive business relationships for the longer term. As such, the Company has established associated operating guidelines in regards to treating other business operators on a sustainable basis and also to the management of its supply chain, in order to enable these other business operators/business partners of the Company to operate their business in an ethical and equitable manner with mutual respect of each others' human rights; as well as to overseeing the vocational health and well-being of the employees, together with giving importance to effectively managing the various involved environmental issues on a sustainable basis; namely:

- 1) Source goods and materials that have the best results/benefits for the Company, through requiring that all goods and materials delivered to the Company should be in strict accordance with the specified quality, price and quantity standards together with a required speedy delivery timeline, and should also take full consideration of the Company's established policies regarding quality, safety, vocational health and well-being, and the environment.
- 2) Those Staff members undertaking sourcing activities are required to have in place effective advance planning for sourcing goods and materials, in order to avoid any need to source such items on an urgent basis without any appropriate associated reasons to do so.
- 3) The Company will not take advantage of any business operator, through taking into consideration of the potential associated benefits and negative damages in regards to its overall reputation and corporate image in the eyes of outside Parties.
- 4) The involved Staff must give clearly specified, comprehensive and accurate information to the involved business operators in a transparent manner, and also give equal opportunities to all business operators.
- 5) The involved Staff should listen to any comments, complaints and suggestions made by and received from business operators/business partners, in order to make improvements and resolve any issues in the associated sourcing activities.
- 6) The involved Staff must maintain the confidentiality of any information relating to bids and proposals received from each of the business operators/business partners, and must not disclose any such information to other Parties.
- 7) All invitations given to business operators/business partners to submit their respective proposals/bids must be done in a manner that achieves genuine and fair competition on an equal and equitable basis for all business operators/business partners.

- 8) All price negotiations must be based on a good business relationships, and be mutually equitable for both sides; as well as must be transparent and fully documented.
- 9) Good business relations must be maintained with all business operators/business partners on a uniform and equal basis, as well as without making any demands for or accepting any items/assets or other benefits – either directly or indirectly – from the business operators/business partners.
- 10) The Management member, with responsibility for and authority to undertake sourcing activities, must use his/her good judgment in offering any suggestions or recommendations; as well as must listen to the opinions of those involved persons working at the operating level.
- 11) The Management member, with the responsibility for and authority to undertake sourcing activities, must oversee, review, and ensure that all associated activities at the operating level are undertaken in strict accordance with the established business ethics. Furthermore, should there be any acts of non-compliance, an immediate investigation must be made together with any appropriate disciplinary punishment accordingly.
- 12) If possible, support should be given to sourcing any goods and materials and services from a Thai business operator/business partner.
- 13) Sourcing of goods and materials should be undertaken in a systematic manner and with established procedures that are correct according to the associated technical process; whereby there are established oversight and stringent controls in place together with built-in flexibility to enable ongoing adaption to the ever-changing business and trading environment.

4.6 Policy on the Treatment of Trade Competitors

The Company treats all trade competitors in accordance with the Trade Competition Act BE 2542 (1999), the legal framework for fair trade competition as well as improper or fraudulent violation or infringement of trade secrets of any trade competitors; namely:

- 1) Acting or good behavior in a manner that conforms within the legal framework for fair trade competition, promoting free trade and competition, and non-dominance (or a monopoly) of the market.
- 2) Not seeking out any trade secrets of competitors in an improper, illegal or fraudulent, and inappropriate manner – such as, through bribing or using a competitor's Staff to obtain confidential information of competitor companies.
- 3) Not destroying the reputation of trade competitors through use of negative disinformation or false information.
- 4) Not supporting any joint actions or collusion in regards to any pricing offers in an inequitable manner for customers.
- 5) Not violating any laws or requirements relating to intellectual property rights.

4.7 Policy on Workplace Safety and Hygiene

The Company operates its businesses through taking into consideration the importance of safety and hygiene of its Staff and employees, since its Staff is the most importance asset and a key component for the Company's ability to both grow and effectively compete on a sustainable basis.

Operating guidelines

In operating its businesses, the Company has defined the following policies relating to the workplace safety and hygiene for its Staff

- 1) Management group members and all Company Staff must conduct business operations that incorporate, as a key component, a system to manage the quality, safety, and hygiene relating to the workplace and the work environment, which will facilitate and promote the effectiveness and efficiency of together with the achievement of maximum value-added from the work activities undertaken.
- 2) The Company undertakes all possible actions in order to control and prevent any possible form of losses resulting from accidents, fire-related hazards and work-related injury or sickness together with any damages to or loss of assets, violation of any established safety rules or regulations, and improper work procedures or any work-related errors. These actions are also to maintain the work environment relating to the safety of its Staff or the employees of its sub-contractors. As such, it is considered to be a key responsibility of both the Management group and Staff members to report any accidents or similar work-related incidents through observing these established procedures.
- 3) The Company has established plans and procedures to control and protect against any emergency situations in every area of its workplace and facilities, together with plans and procedures to effectively manage any emergency or crisis situations within the organization. This is in order to be well-prepared once or if such situations have occurred – such as: fires; oil spills and overflow; spills and leakage of any gas, chemicals or waste materials - and any other similar incidents of a critical nature, that will interrupt ongoing normal business operations as well as will have a negative impact on the overall reputation and image of the Company.
- 4) The Company undertakes regular public relations and corporate communications activities, in order to educate and disseminate all relevant information and to create a better awareness and understanding, on the part of its Staff, its sub-contractors' staff and all involved Stakeholders, of the Company's relevant policies, rules and regulations, together with the established procedures and key issues regarding the quality, safety, and hygiene of the Company's workplace facilities and environment. This is so that they can all observe these required regulations and procedures, and avoid creating any dangers to their health and well-being as well as to the workplace facilities, assets and environment.

- 5) The Company promotes as well as instills an awareness, on the part of its Staff, regarding workplace quality, safety, health and hygiene, and environments so that it becomes an integral part of their daily work routine.
- 6) The Company participates in carrying out its social responsibilities with regard to the workplace quality, safety, health and hygiene, and environment in a genuine manner as well as on a continuing basis. It also supports effective use of natural resources to achieve maximum benefits, through recognizing the importance of the environment and the safety of all involved Stakeholders; as well as promotes any social activities aimed at preserving or protecting the environment and further improving people's quality of life within the community in accordance with the principles of sustainable development.

Report of Progress and Current Status

Achieved results from all activities relating to workplace safety and health and hygiene are disclosed, through recording various statistical data on accidents or incidents of injury, and absence from work due to injury and sickness; whereby such information and statistics are reported in the Annual Report.

Policy Reviews

The Company's policy on workplace safety and health and hygiene are reviewed annually by the Board of Directors, so as to enable the policy to be always timely and to reflect the current situation.

4.8 Policy on Staff Compensation and Welfare Benefits

Quality Staff is considered to be a key factor in supporting the successful achievement of the Company's strategies. As such, recruiting, retaining and motivating such Staff are considered to be long term and valued investment, that will result in the organization achieving success in the longer term.

Amata VN PCL recognizes the vital importance of effective management of its Staff compensation scheme in a fair and equitable manner, which eventually will create a competitive business advantage for the Company.

Compensation

1. Assess and determine the relevant job-value in a systematic manner, in order to define work group and associate positions/rankings based on the scope of duties and responsibilities as well as value or degree of importance for the organization. This is to then enable the determination of the applicable associated compensation, in order to be competitive within the external labor market while also effectively motivating the Staff internally.
2. Undertake Staff job performance evaluation 2 times per year.

3. Review short term compensation to be given, based on actual achieved job performance outputs, through using key performance indicators (KPIs) relating to:
 - Targeted performance objectives and goals together with agreed annual KPIs', degree of success or actual achieved performance results – on an organization-wide basis as well as for the work team and individual team members.
 - Special capabilities or individual expertise
 - Leadership skills
4. Review long term compensation to be given, based on actual achieved job performance outputs, through using key performance indicators (KPIs) relating to:
 - Upward promotions in the job position/rank, together with an increase in the percentage contribution to the provident fund by the Company based on the total number of years of employment in the Company, and/or giving Staff Welfare Benefits in the form of cash payments and additional amount of paid health and hospital related expenses. This is in order to motivate Staff members to continue ongoing development of their skills set.
 - Assessment of the degree of successful achievements in the job performance on a long term basis, through relating such achievements to the overall success of the organization's strategies based on the corporate 'Balance Score Card' program,

Staff Welfare Benefits

Employee Provident Fund

Report and Disclosures of Information

Disclosure of information on the associated operating activities are made, together with relevant statistics being recorded, are reported in both the Annual Report and the Sustainability Report.

4.9 Policy on Human Resources Development

Amata VN PCL regards its Staff as a key factor and of great value in contributing towards the overall success and ongoing growth of the Company on a sustainable basis, through carefully selecting good individuals, creating very capable people who work in a professional manner; as well as through effective strategic planning and management of its human resources, that are fully aligned with the overall corporate strategies, in order to achieve the overall core corporate objective of being a 'High Performance Organization'.

Further, in order to establish the required corporate infrastructure for a company that is growing both at the national and regional levels, the Company regularly reviews its corporate structure together with making ongoing improvements to its management operations, its corporate cultures foundation; as well as continuously instills its core corporate values into its Staff throughout the organization. As such, the following associated operating guidelines have been established:

- 1) The Company's overall management of its Human Resources Management system and procedures must be aligned with and fully supportive of overall corporate strategies, business objectives and goals.
- 2) Define the Company's Human Resources Management system and procedures to be like those of a leading business company; whereby they should be in clearly defined, concise, transparent, and equitable as well as all moving towards the same uniform direction throughout the organization.
- 3) The Company will recruit, select as well as create good and very capable individuals, who work in a professional manner.
- 4) Every Superior/Supervisor has the duty and responsibility for managing and developing the human resources within their respective business units, in accordance with the Company's established human resources management system, procedures and operating guidelines.
- 5) Each and every Staff member has the duty to perform their work to the best of his/her ability and in a responsible manner; as well as to be fully committed in devoting their efforts to achieving the best performance outputs and adhere to the established principles of good business ethics in accordance with the overall corporate culture of the organization.
- 6) Development of human resources is the responsibility of the whole organization, the Superiors/Supervisors and every individual Staff member. The Company will develop, on a continuing basis, its employees by providing them with effective knowledge, know-how and abilities that are relevant to their assigned job responsibilities. The respective Superior/Supervisor is responsible for planning, monitoring progress, evaluating actual performance outputs, and providing feedback to their subordinates. While the subordinates are required to always seek out more knowledge and to learn more, through being committed to furthering their self-development.
- 7) Career advancement, together with the associated compensation and various motivation schemes offered are based on the quality of the (individual's) performance outputs, mindset, and the overall potential of the Staff member.
- 8) The Company will manage the Staff compensation/remuneration scheme, so that it is comparable with other leading companies in the same or nearest industry/business sector.
- 9) In achieving success in their job positions, the Staff member must possess relevant knowledge or know-how and skills in various aspects of the assigned work, together with other knowledge about the Company's business and also especially 'people skills'. During each year the Company offers, through informing the Superiors/Supervisory levels, various training courses; whereby after making their assessments, they will then consider the appropriateness of enrolling their subordinate Staff, who, during each year, should receive at least a total of 20 hours /per year of training and development activities.

Report and Disclosure of Information

The Human Resources Division/Department is responsible for recording and maintaining relevant statistics in regards to the ongoing people development activities – namely: type of training and development courses offered, number of Staff attending each course and associated number of hours of training during the year; all of which information are reported and disclosed in both the Annual Report and the Sustainability Report.

4.10 Policy on Non-Violation of Human Rights

Amata VN PCL believes in the international ‘Declaration on Human Rights’ that all Staff members are valued as a human beings, regardless of their job or position; and all possess human dignity in an equal manner, with each person having an individual respective part to play in the overall duty to develop the organization so that it can grow together with them.

Thus, Amata VN PCL. respects the individual’s human rights in a strict manner; whereby:

- 1) All Staff members have the freedom and equality in having the opportunity to display their respective potential capability and to work on an equal basis, without any prejudice or bias in regards to nationality, race, gender, religious beliefs, race and physical disability.
- 2) All Staff members are equal, and have the same protective rights under the law on an equal basis without any prejudice, bias or favoritism.
- 3) All Staff members have rights in their work, freedom of choice in regards to the applicable terms and conditions, that are both equitable and beneficial to the assigned work.
- 4) All Staff members have the right to be compensated equally for the same type of assigned work/job without any prejudice, bias or favoritism.
- 5) All Staff members have the right to receive a fair rate of compensation that is of benefit for the security of their livelihood, of the individual and of the immediate family that is suitable for their human dignity. And, if necessary, additional required social protection and benefits must also be received.
- 6) All Staff members have the right to rest and recreation time, including arranged working hours/time as appropriate and occasional paid holidays from work.
- 7) All Staff members have the right to enjoying adequate living standards that is sufficient for their own health and well-being as well as for their family, including food, clothing, living facilities and medical attention together with any necessary social services.
- 8) Staff members have the right to security of livelihood during periods of not working, sickness, or when in a state of widowhood, as well as in old age or when lacking any

employment that are all beyond their personal control.

- 9) The Company will not tolerate any incidents of sexual-abuse or sexual harassment of any Staff members, regardless of any reason whatsoever.

Report and Disclosure of information

A report of the associated and relevant information is disclosed in the Annual Report.

4.11 Policy on and Operating Guidelines for the of the Treatment of Creditors

Amata VN PCL has a policy on treating its creditors in an equitable manner, through establishing the following associated operating guidelines and procedures:

- 1) The Company ensures that it will repay, in full and on time as required, all types of loans and borrowings, together with associated interest payments, as well as will comply to all agreed terms and conditions.
- 2) The Company will not use any funds borrowed in any way other than as intended and that contravenes the stated purpose of the loan when seeking funds from the creditor. As such, the Company will consider, as best as it can, the real necessity for borrowing funds before actually deciding to borrow or guarantee loans from its creditors.
- 3) The Company will not hide any relevant information or true facts that may result in damages or loss to its creditors; but will disclose, in a complete and comprehensive manner, all relevant information to its creditors as necessary and required.
- 4) The Company is committed to conducting and managing its businesses in an effective manner, so as not to allow any required loan repayments to be missed; and will maintain, at its best, the ability to service debts.
- 5) The Company is committed to strictly adhering to and acting in accordance with all terms and conditions as agreed with its creditors. However, in the event that there is a need to amend any agreed terms or conditions, the Company will then immediately meet and discuss the issue together with its creditor(s), as follows:
 - The Company is committed to acting in strict accordance with the terms and conditions of the loan or guarantee agreement with its creditor(s); whereby in the contract negotiations consideration will be made to the appropriateness, necessity, and overall benefits for the Company.
 - The Company undertakes to execute all loans and guarantee contractual agreements with all due care, and always in written form.
 - In the event that it is necessary to amend any previously agreed terms and conditions of loans or guarantee agreements, the Company will then immediately discuss the issue with the creditor in question; whereby any amendments will take into consideration the appropriateness, necessity and overall benefits for the Company.
- 6) The Company is committed to maintaining good business relationships with its creditors, and to creating mutual trust and confidence.

Report and Disclosure

Disclosures of associated information and activities are reported in the Annual Report.

4.12 Policy on and Operating Guidelines for Non-Infringement of Intellectual Property (IP) Rights

Amata VN PCL has a policy to have all Staff members to have the duty and responsibility for making the fullest and best use of the Company's assets, as well as to ensure that the assets do not deteriorate or are lost, or not to make use of these assets for their own personal benefit or the benefit of other Parties. Additionally, Staff members are responsible for protecting against and also for overseeing that any allegations of infringement of Intellectual Property Rights from occurring. They are also responsible for ensuring that there is no disclosures/distribution of any associated Intellectual Property Rights materials without prior approval is obtained, and for not, themselves, infringing any Intellectual Property Rights of other Parties.

Operating Guidelines

- 1) It is prohibited for any Staff members to use/make use of any information or data, documentation or materials, computer software programs, books or written articles, together with any VDO and audio tapes that belong to other Parties, in manner that would result in an infringement of the Intellectual Property Rights of others, regardless of whether or not the legal and rightful owners of such Intellectual Property contents have declared or asserted, in writing, their 'copyright' or rights of ownership.
- 2) All Staff members have the duty and responsibility in jointly help in overseeing and protecting any work outputs of the Company that are the Intellectual Property of the Company. They are also not permitted to make use of such Company Intellectual Property for personal benefits or allow other Parties to make use of such Company Intellectual Property without prior approval and agreement.
- 3) While working as a Staff member of the Company, any achieved outputs of their Research & Development activities in making any improvements or enhancements that are connected and involved with the business operations of the Company, in any way, are all considered as the Intellectual Property of the Company.
- 4) Staff members of the Company have the duty and responsibility to report to their Superiors/Supervisor, in the event that they should come across any actions or activities that appear to infringe any Intellectual Property Rights of the Company or that may lead to a legal dispute relating to any Intellectual Property Rights of the Company.
- 5) Upon ceasing to be an employee of the Company, all Staff members are required to hand back to the Company all Intellectual Property related materials and assets - including any actual work outputs, created products/items, information and data, formulas, reports and statistics, computer programs, and working procedures.

Report and Disclosure

Disclosures of associated information on any infringement of any Intellectual Property Rights, through recording statistics of any such incidents for eventual disclosure, are to be made in both the Annual Report and the Sustainability Report.

4.13 Policy Corporate Social Responsibility

Amata VN PCL has a policy to develop the wider society, in which the Company operates its businesses, to be more developed and to grow together with the Company's development and growth. The Company's Board of Directors have the intent to participate with its Stakeholders through being committed to build a well-accepted positive relationship of mutual trust, together with creating a better overall quality of life for the Company's Staff and their family as well as the immediate local community in which our business operations is located. The Company's Board of Directors also fully recognizes the importance that the ongoing growth of the organization must move in the same direction as the overall development of the wider society.

The Company is committed to conducting its business with integrity and in an equitable and transparent manner, through taking into consideration the overall benefits of and possible impacts for all Stakeholders as a result of the organization's business operations and activities; as well as to helping to develop the potential of people within the wider society by focusing on building people's knowledge, thinking, good ethics and moral principles. The Company undertakes various activities and events aimed at improving overall social standards, so that it is a good society comprising of good and capable people, who are mindful of their social responsibilities, which will then enable the wider society to coexist with the Company in a positive manner as well as on a sustainable basis.

Report and Disclosures

Associated information on the various CSR activities undertaken annually and/or during the year are disclosed in the Annual Report.

4.14 Policy on Operating the Business within Environmental Standards

Amata VN PCL operates a property development business for quality industrial businesses as well as for public utilities businesses and its associated services, targeting local and foreign investors. At the same time, it recognizes the importance of making use of available natural resources together with the associated potential impact on the environment and the genuine need to protect and preserve the overall environment of the local community; whereby the Amata Group of Companies is intent on operating its businesses with the following commitments:

- 1) The environment : The Amata Group of Companies operates a property development business for industrial businesses as well as for public utilities businesses and its associated services, targeting local and foreign investors to invest in quality industrial activities. At the same time, the Company recognizes the importance of making use of available natural resources together with the associated potential impact on the environment and the genuine need to protect and preserve the overall environment of the local community.
- 2) The Amata Group of Companies will act in full accordance with all applicable laws and regulations relating to the environment.
- 3) The Amata Group of Companies is focused on preempting and preventing the occurrence of any problems that will impact the status of environment before they arise, as well as at the immediate locations involved.
- 4) To reduce as much as possible the amount of waste, and to make the fullest possible use of waste water that has already been treated and cleaned.
- 5) The Amata Group of Companies is focused on using and conserving any energy and associated resources used in its production process in an effective and efficient manner.
- 6) The Amata Group of Companies will continually develop and improve its wastewater treatment process, its clean water production process, its waste materials and general garbage treatment process, together with its system and process of reusing water.
- 7) To instill an awareness, on the part of all its Staff, for the need to help preserve and protect the environment - through using the slogan of "Green and Clean".
- 8) To advertise and promote its 'environment-friendly' policy to all its Staff or other Parties undertaking any work activities, as well as to the general public.

Report and Disclosures

Associated information on the various associated activities are disclosed in the Sustainability Report.

4.15 Policy on Promoting Effective and Efficient Use of Resources

1. The Amata Group of Companies will act in full accordance with all applicable laws and regulations relating to the environment.
2. The Amata Group of Companies is focused on preempting and preventing the occurrence of any problems, that will impact the status of environment, before they arise as well as at the immediate locations involved.
3. To reduce as much as possible the amount of waste, as well as to make the fullest possible use of wastewater that has already been treated and cleaned.

4. The Amata Group of Companies is focused on using and conserving any energy and associated resources used in its production process in an effective and efficient manner.
5. The Amata Group of Companies will continually develop and improve its wastewater treatment process, its clean water production process, its waste materials and general garbage treatment process, together with its system and process of reusing water.
6. To instill the awareness, on the part of all its Staff, for the need to help preserve and protect the environment through using the slogan of “Green and Clean”.
7. To advertise and promote its ‘environment-friendly’ policy to all its Staff or other Parties, who undertake work for the Amata Group of Companies, as well as to the general public.
8. The Company has published its “Code of Business Ethics Handbook/Manual” and has announced the Handbook for acknowledgement, use and strict adherence by all Board Directors, Executives and Management Group members and Company Staff. The Company has also defined, in the abovementioned Company’s “Code of Business Ethics Manual/Handbook”, the appropriate punishment and penalty for any acts of non-compliance with these established business ethics, together with the associated compensation measures in the event that any Stakeholders suffers damages as a result of the Company violating or infringing any rights as entitled by the applicable Stakeholders laws.
9. The Company has overseen and protected the environment in a positive and effective manner; whereby it has received the associated ISO 14001 Quality Standard certification from TUV Anlagentechnik GmbH for both its Amata Nakorn Industrial Estate and the Amata City Industrial Estate since 26 June, 2000.

Report and Disclosures

Recorded relevant information on associated activities undertaken are disclosed in the Annual Report.

5. Code of Ethics for Company's Staff

The Company operates a business relating to industrial estates for the benefit of its Shareholders and the country's economy; and as such, it is necessary to maintain its professionalism, flexibility and independence. Therefore, in order to achieve the abovementioned corporate characteristics in a stable and ongoing manner, various 'best practices' have been established for the Management and Staff members, which are considered as operational business ethics, as follows:

5.1 Self-Treatment

- 1) Discharge the assigned duties in a responsible manner with honesty, integrity and full commitment and devotion to their work. Act in full compliance with all applicable rules, regulations and policies of the Company as with the established corporate culture and values through place importance on the overall benefits of the Company.
- 2) Respect and act in strict accordance with all applicable laws and regulations of the Company.
- 3) Operate and undertake their assigned work with due care and honesty; and not to make use of their position/rank to gain any benefits in an improper or illegal manner.
- 4) Be fully committed to be a good and capable person, through constant self-development in a positive manner, in order to benefit themselves and the Company as a whole.
- 5) Study and acquire new knowledge and experiences, in order to improve their work- related capabilities and abilities.

5.2 Treatment of customers/clients, other involved Parties and the wider Society

- 1) Maintain strict confidentiality of the information of customers/clients and business partners as well as that of the Company, through ensuring and taking care that no Company-related confidential documents and news are leaked to or falls into the hands of those who are not directly involved.
- 2) Act in full compliance with all safety regulations, as well as oversee and ensure the safety of the operating environment.
- 3) Achieve and deliver quality work outputs in a timely manner as required by customers/clients.
- 4) Make use of the channels of communications for listening to and obtaining any comments, opinions or suggestions from the customers/clients, in order to benefit from implementing any improvements in the Company's operating procedures.
- 5) Avoid giving or receiving any gifts/items, acts of hospitality (entertaining) or any other benefits to/from involved business partners or any Stakeholders of the Company's businesses, except for the specific purpose of normal good business conducts or for normal customary special festive occasions or events; whereby such gifts and entertainment should be of appropriate and reasonable value. If the gift item received is in the form of cash or of a very high value, the item should be immediately reported to the direct Superior/Supervisor or chain of command as well as be returned.

5.3 Treatment and Actions among Fellow Staff Members

- 1) Respect the individual personal rights of all fellow Staff members; avoid disclosing any information about any fellow Staff members – including work-related as well as personal information; and avoid criticizing fellow Staff members in a way that will have a negative or damaging effect on the person in question and/or the overall image of the Company in general.
- 2) Do not make accusations against or disclose any disinformation about other fellow Staff members, that may result in spreading disunity and discord and cause internal damages within the organization or in causing damages to any other persons involved with the Company.
- 3) Maintain and jointly create an atmosphere of oneness, unity and close collaboration amongst all the Company's Staff members; as well as mutually support and help fellow workers in a positive manner for the overall benefit of the Company.
- 4) Behave towards fellow workers in polite manner with generosity and good human relations; as well as not hide from or fail to disclose any work-related information to fellow workers. Constantly adapt yourself to be able to work with others as a team; and show respect for fellow workers in not claiming any achieved work outputs of others as being your own.
- 5) Be committed to having good moral principles and ethical behavior; and avoid all immoral or sinful acts together with always avoid behaving in a manner that will have a negative effect on yourself and the Company as a whole.
- 6) Report to the direct Superior/Supervisor or the chain of command or to the Audit Committee, in the event of being aware of any suspicious incidents of corruption or wrongful actions within the Company.
- 7) Help undertake any activities aimed at protecting and preserving a positive working environment and ambiance, as well as at driving the organization towards the achievement of excellence.

5.4 Treatment of the Organization

5.4.1 Operating guidelines relating to accounting and financial transactions

1. Correct recording
 - Correct recording all business transactions of the Company must be fully accurate, and complete as well as can be audited without any form restrictions or exceptions.
 - Recording all accounting and business transactions of the Company must be accurate and true to the actual facts, without any distortion or documenting any false information for any reason whatsoever.
 - Company Staff, at all levels, must undertake all business transactions in accordance with the established regulations and requirements of the Company. This also includes any business-related documentations that must be complete and consist of the actual facts, in order to effectively disclose all relevant information in a beneficial and timely manner; whereby any involved Parties responsible for recording details of such accounting and financial transactions

of the Company can do so accurately and completely in the established accounting system of the Company.

2. Accounting and Financial Reports

- Every Staff member must not distort or falsify any information – regardless of whether it is information relating to accounting and financial transactions or to any operating activities.
- Every Staff member must recognize that having accurate and completely correct accounting information is the joint responsibility of all Board Directors, involved and responsible Management group members and Company Staff members.
- Every Staff member is responsible for preparing and/or disclosing accurate information relating to all business activities undertaken
- Acting in accordance with the law
 - Every person, at all levels, within the organization must act in full accordance with all applicable laws and associated legal and regulatory requirements – either in Thailand or overseas, in order to enable fully accurate, complete and comprehensive accounting and financial details to be recorded and documented.
 - Every person, at all levels within the organization, must adhere to the principles of honesty and integrity; not have any prejudice or bias as well as have correct and straight forward behavior in keeping all detailed records; whereby such straight forward behavior includes not being involved in any illegal, improper or unethical activities.

5.4.2 Operating guidelines relating to internal controls

Having in place internal controls and internal audit procedures, that are effective, correct and creditable, is essential to create a positive image for the Company. The Company has defined policies on corporate governance practices relating to effective internal controls systems together with risk management procedures that are appropriate and adequate; as well as monitors and evaluates these activities on a regular basis. The Company is committed to having in place the most effective internal audit procedures as possible; whereby the Audit Committee is responsible for overseeing this activity together with a very capable Internal Audit Unit, as well as the Management group and all Company Staff give great importance to having in place such internal controls and internal audit procedures and activities.

- 1) The Board of Directors has established the corporate governance-related policy to have in place an adequate internal controls system together with appropriate level of risk management procedures as required to ensure the achievement of the stated corporate objectives and that these will not be adversely affected; whereby close monitoring and evaluation of the outputs of such activities are made on a regular basis.
- 2) The Audit Committee reviews the established internal control system and reports the evaluation results to both the Board of Directors and the Shareholders.

There are 5 core components of the internal controls systems as follows:

- Having in place a 'Control Environment', so that the Company Staff have a positive mindset towards the established internal controls.
 - Having in place effective 'Risk Assessment' procedures to be able to adequately evaluate various risk factors relating to the business operations of the organization, that may have an adverse effect on the overall goals and success of the business activities.
 - Having in place effective 'Control Activities' in regards to all duties and responsibilities as well as for all Staff levels that are appropriate for the targeted acceptable levels of risks.
 - Having in place a good Information and Communications technology system that is adequate, creditable and timely in being able to effectively communicate, as appropriate, with both internal and external Parties of the organization.
- 3) Having in place effective 'Monitoring and Evaluation' procedures, in order to ensure that the established internal controls system is adequate as well as is being actually implemented; and also in order that any required improvements or enhancements are made in a timely manner, so as to be timely and be aligned with the ongoing changes in the overall current situation.
- 4) Management group members implement the policies, as defined by the Company's Board of Directors, so that the overall business operations will achieve the targeted goals, through :
- Senior Management establishes an effective internal controls system within the Company; and instills, on the part of the Company's Staff, the required disciplines and positive mindset in regards to internal control procedures.
 - Middle Management implements the established internal controls system and associated procedures within their respective business departments for which they are responsible; as well as monitors, evaluates and makes ongoing improvements to the actual practices undertaken in order to ensure that they are fully in accordance with the established and intended procedures.
- 5) Every Company Staff, at all levels, complies to the various established rules, regulations, procedures, orders and measures as well as internal controls systems and procedures.
- 6) The Internal Audit Unit is directly responsible for monitoring and evaluating the results and outputs of the established internal controls system and procedures; as well as for overseeing and assessing full compliance is made by everyone. It will also make suggestions or recommendation to the various operating business units, as appropriate to the constantly changing current situation, business environment and perceived risks factors.

5.4.3 Operating guidelines on the use of information and communications technology (ITC) system

The Company supports the Company Staff to make use of the information and communications technology system, in order to create and enhance the understanding on

the part of external Parties for the overall benefit of the Company; whereby full care must be taken in undertaking their work, together with the Intellectual Property Rights of others must be fully respected and observed.

- 1) The Company has defined that the information and communications Technology system is a key component in supporting and enhancing both the effectiveness and efficiency of Company's business operations. As such, it is the responsibility of everyone in the organization to use the information and communications technology systems in accordance with all applicable laws together with the orders issued by the Company and within the established standards of the Company.
- 2) The Company has established cyber-safety and cyber-security procedures relating to the information and communication technology system – namely: the computers system, the information contained in these computers - in accordance with international standards.
- 3) Every Company Staff member has the duty to adhere to these established operating procedures:
 - Be responsible for protecting and ensuring that the Company's information and communication technology system assigned and being used by their business unit or themselves personally is not accessed, in an improper manner, by any unauthorized persons; as well as not to disclose any important business-related information to those not involved or authorized to know.
 - Have strict discipline in using the Company's information and communications technology system and any associated equipments, so that there will be no adverse impact on the Company's reputation and those of other Parties – such as: using the system to access information in an improper or illegal manner; causing damage to the reputation or assets; disturbing or disrupting the use of the Company's information and communications technology system by others; and illegally obtaining other people's password and any information; creating any false computer information or posting and disseminating inappropriate pictures, audio clips or information; making personal use of the system and not for the business purpose of the Company, together with any other associated illegal activities.
 - Not to infringe or violate any Intellectual Property Rights of others
 - Must use a special password when sending any important business-related information via the internet; and not to exchange any important business-related information through an unsecured website.
 - In the event that a Company Staff asks for approval for an associate worker or sub contractor staff to use the ITC system, the Company Staff in question must oversee and ensure that the associate worker or sub contractor staff as well as take responsibility for any resulting damages that may be caused for the Company.
- 4) The Company will search, access, monitor and evaluate any information relating to the use of the ITC system by a Company Staff, in the event that it suspects a Staff member of using the ITC system in an allegedly inappropriate and improper manner,

or in order to protect the safety and ensure the overall security of the Company's ITC system.

- 5) In the event that the Company is made aware of or knows that any Staff member has violated or infringed any Intellectual Property Rights of others, and the result of the subsequent investigation, undertaken in an equitable manner, indicates that this is true; then the offender will be subject to disciplinary punishment and/or legal prosecution accordingly - as appropriate on a case by case basis.

5.4.4 Operating guidelines on maintaining confidentiality

With regards to any confidential information not disclosed for public use, including information about the types of customers/clients or information given to the Company by its customers/clients in trusting the Company, the Company will be responsible for maintaining the security and confidentiality of all such information. As such, only those people with a need to know will be given access to such information; and it is the duty of those officials, with the responsibility for keeping and safeguarding such confidential information, to strictly adhere to the following security procedures:

1. Maintaining the confidentiality of the Company's information
 - The Company's Board of Directors, Management Group members, Company Staff, employees and any sub contractors and their staff must maintain the confidentiality of all business-related information and documents and formulas, together with any results of R&D activities and developed items/processes that are considered to be the intellectual property or asset of the Company.
 - Those who are appointed as Company Board Directors Management Group members, Company Staff, or hired as employees and sub contractors and their staff must not disclose any business-related information and any associated documentations that are considered as being confidential.
 - Management members and Company Staff must be informed of all procedures relating to the security, safe-keeping and maintenance of the information confidentiality; as well as must act in full accordance with such procedures, in order to ensure that such confidential information is not unintentionally disclosed by mistake.

2. Establishing the security levels of information
 - Confidential trade and business information must be fully protected from being leaked or disclosed, base on the degree of importance of such information - namely: information that can be disclosed, information that cannot be disclosed, confidential or secret information, and very confidential and top secret information.

- Joint use of internal company information/data must be only undertaken within the framework of the assigned duties and responsibilities

3. Disclosing information and news to external Parties

- The President/Managing Directors or those authorized/assigned by President/Managing Directors will decide and approve what information can be disclosed to the general public
- Disclosures of information about any Joint Venture Business Partners must be approved by the Joint Venture Partner in question.
- The authorized Business Unit/persons to approval and/or disclose any information to the general public are: Office of the President/Managing Directors, the Corporate Communications Department, and the Investor Relations Department; whereby the Business Units that owns the relevant information will be responsible for preparing the detailed information to be disclosed.

4. Expressing opinions to external Parties

- Disclosing or expressing any opinions to external Parties is not permitted.
- You should ask yourself first “whether or not you have the duty and responsibility to express any such opinions to any external Parties”; and if not, then you should decline to comment or express any opinions in a polite manner, and suggest that further contacts should be made directly with involved Company Official/Office as indicated above.

5.4.5 Operating guidelines on receiving and giving gifts, items/goods or assets, or any other benefits

Receiving or giving of any gifts or items upon traditional or customary occasions and done in accordance with good moral principles and business ethics is normal and accepted; whereby the Company’s Staff can undertake such actions in order to display loyalty and gratefulness or caring for others. However, the giving and receiving of gifts or other items and benefits that is inappropriate and improper may result in future uneasiness, as well as may affect any future work-related decisions together with an eventual loss of benefits for the Company as a whole. As such, the Company definitely does not support the giving of any bribes; whereby the giving or receiving of any gifts or other items should be done in accordance with the following principles and procedures:

- 1) Company Staff members can accept gifts or items or other benefits from any person in the following manner:

- Any items/goods or benefits that is appropriate and in accordance with the law or any specified regulations based on the applicable laws,
- Gifts or items/goods or other benefits that are given in an ethical manner, namely;
 - receiving from relatives
 - receiving such items as given to people in general

2) The Company had defined additional operating guidelines with regards to giving/receiving gifts and other items/goods or benefits as follows:

- All Company Staff, at every level, including their family members is forbidden to request or ask for any gifts and other items/goods, or benefits from the Company's contractors or sub-contractors, business partners, customers/clients, business operators/suppliers, joint investors, or any other Stakeholders involved with the businesses of the Company whatsoever; which may affect the Company in making future decisions, potential bias or uneasiness, or may even lead to a potential conflict of interests situation.
- The Company will use its discretion and good judgment in giving gifts or other items and benefits to others, that is not considered to be improper, inappropriate or extravagant, not in breach of any good custom or tradition and not against any applicable laws in Thailand or in an overseas market in which the Company has made an investment to operates its business.
- The Company will regularly remind those who are involved to disclose any such actions in regards to receiving or giving of any gifts and other items or benefits; as well as will always inform all its contractors, sub-contractors, business partners, customers/clients, business operators/suppliers and all those involved with the Company's businesses of this Company policy on giving/receiving gifts etc..

5.4.6 Operating guidelines on vested interests and conflict of interests

All Company Staff are required to undertake their work through keeping in mind that the overall interest or benefit of the Company is more important than their own personal benefit; and that they should not have any duplication or conflict of interests, as well as not have any intended personal gains and be free from any influence from their close relatives and friends.

As such, all Company Staff should act in strict accordance with the following measures aimed at preventing any potential vested interests, and should disclose any vested interests as specified by the Company:

- 1) Not be a shareholder/business partner/investor with a controlling power or a Management member in any company or business that is in direct competition with or of a similar nature as that of the Company.
- 2) In the event that a Company Staff becomes involved in a business or a situation that may have potential conflict of interests with the Company, then this fact must be immediately disclosed to the direct Superior/Supervisor.

- 3) Not to seek or obtain any benefits, by using any information or other items received due to the assigned job position.
- 4) Avoid becoming involved in any business or activities that may result in a conflict of interests situation with the Company, or that may create any form of financial obligations with anyone involved or connected with the Company's businesses.
- 5) Avoid undertaking any additional work activities other than those assigned by and undertaken for the Company, which may have an impact on the assigned duties and responsibilities within the Company.
- 6) Support all social activities relating to preserving and protecting the environment as well as to improving the overall quality of life for those in the community, in accordance with the principles of sustainable development.
- 7) The Company continuously instills, on the part of its Staff at all levels, the awareness and mindfulness relating to corporate social responsibilities as well as to its responsibility towards the environment.
- 8) The Company wishes to actively participate, on a continuous basis, in creating and developing a better society and environment, through undertaking only those appropriate activities that are aimed at achieving genuine benefits for the community, the wider society and the environment. In the event of making any charitable donations, details will be reviewed and assessed, in order to be sure that the donations will be used in an effective and productive manner to achieve real social benefits as intended.

6. Oversight in ensuring full compliance with and in regularly reviewing of this “Code of Ethic in conducting Business”

The Company has defined and considers that it is the duty and responsibility of all Board Directors, Management group members and Company Staff to acknowledge and act in full compliance with the established policies and guidelines contained in this “Code of Ethics in Conducting Business” Handbook; whereby such compliance is not on a voluntary basis, and stating the fact of “not being fully aware of the established operating guidelines” cannot be used as an excuse for non-compliance. All Executives and Management group members, at every level within the organization, are required, as a top priority, to oversee and act to ensure that their respective subordinates fully acknowledge, understand and genuinely behave in strict compliance with this “Code of Ethics in Conducting Business” Handbook and its associated operating guidelines.

The Company also does not wish to have any actions that are against the law be in conflict with this established principles and code of good business ethics. In the event that any Board Directors, Management group members and Company Staff do not act in full compliance with the established good business ethics, they will be subject to disciplinary action; and if it is found that any such persons has broken any laws, or has not complied with any applicable public sector rules or regulations or those of the Company, then they will be handed over to the public authorities as applicable.

The Company’s Corporate Governance Committee will regularly review these established code of business ethics and the associated operating guidelines every year, in order to ensure that they are current and timely to the latest situation and operating environment.

Form for use in acknowledging and confirming agreement to act in full compliance with Amata VN PCL's "Code of Ethics in Conducting Business Handbook"

I have read and understand, as well as agree to fully comply with the Company's "Code of Ethics in Conducting Business" as the core operating principles.


Signed:

()

Division/Department.....

Date.....

Note :Should you need any further clarification and explanation regarding the contents contained in this document :

 *For Board Directors and Management Group members:*

*Please contact The Company Secretary
Direct Telephone No. : (66) 0-2792-0004
Telephone (66) 0-2792-0000 ฝั่ง 150
Fax (66) 0-2318-1096*

 *For Staff members:*

*Please contact The Human Resources Department
Telephone : (66) 0-2318-0007
Fax : (66) 0-2318-1096*