

Code of Conduct

Pro Inside Public Company Limited

Pro Inside Public Company Limited (the "Company") places importance on, and is committed to, managing and conducting its business with transparency and integrity, and to being responsible to its stakeholders, mindful of society and the environment, under the principles of good corporate governance. The Company has therefore prepared this Code of Conduct to serve as a guideline for proper conduct in carrying on its business. In this regard, the Company's relevant personnel — namely directors, executives, employees, workers, and the Company's representatives (collectively, the "Company's Personnel") — together with subsidiaries and associated companies, or other companies over which the Company has controlling authority, must study, understand, respect, refrain from violating, and strictly comply with the applicable laws, regulations, orders, announcements, and the Company's Articles of Association, as well as the criteria, requirements, and regulations of relevant government authorities, and must respect local customs, traditions, and good culture, and must report complaints and whistleblowing tips upon discovering any violation of or non-compliance with the law.

This Code of Conduct reflects the Company's values and intent to operate with integrity, taking into account its duties and responsibilities to society, the law, and morality; responsibility to shareholders; relationships with business partners and trade competitors; responsibility to employees; and responsibility to the environment. Subsidiaries, associated companies, and companies within the group are encouraged to consider adapting this Code to their own business context through each company's internal approval process. This Code will be reviewed and continuously updated at least once a year, so that its content remains consistent with the Company's operations and with currently accepted international practice. The Company has announced and notified all relevant personnel of this Code, and requires them to sign in acknowledgement and to strictly comply with these guidelines, in order to lead the organization towards its goal of building stability and sustainable growth. Details are set out below.

The Company's Code of Business Conduct

1. Integrity and Responsibility to the Business

Practice Guidelines:

1.1 Legal, Regulatory, and Company Policy Compliance

- The Company's Personnel must study and thoroughly understand the laws, articles of association, regulations, orders, and announcements, as well as the operating procedures relevant to their duties and responsibilities, and must comply with them strictly, without neglect or disregard, and without causing any damage to the Company, colleagues, or any person connected with the Company.
- Personnel must respect the customs, traditions, and culture of each locality or country in which the Company conducts business.
- Personnel must not assist or support any act that evades or violates compliance with the laws, articles of association, regulations, orders, and announcements of the Company.
- Where an act in violation of, or non-compliance with, the law, the Articles of Association, regulations, orders, or announcements of the Company is discovered, this must be reported immediately to a supervisor or through the complaint channel, in accordance with the whistleblowing policy.

1.2 Conflict of Interest

- The Company's Personnel must avoid any act that conflicts with the Company's interests, whether arising from dealings with the Company's business contacts, such as suppliers, customers, or competitors, or from using opportunities or information obtained through their position as a director or employee for personal benefit or the benefit of another person.
- The Company's Personnel must not operate a business that competes with, or is of the same nature as, the Company's business, and must not undertake other work outside their duties at the Company that affects their work performance or is detrimental to the Company's operations.
- The Company's Personnel must refrain from holding shares in, or being a decision-maker or executive of, a competing business or a competitor of the Company. Where an employee acquired such shares before becoming an employee or before the Company entered that line of business,

or acquired them by inheritance, including cases where this cannot reasonably be avoided, this must be reported through the channel and procedure prescribed by the Company.

1.3 Anti-Corruption

- Directors, executives, and employees of the Company must strictly comply with the anti-corruption policy and this Code of Conduct, and must not support corruption or bribery in any form, whether direct or indirect.
- Charitable donations, donations to political parties, business gifts, and support for external parties' activities must be transparent and free of any hidden intent to induce a government official or private party to act improperly.
- The Company's Personnel must avoid giving or receiving gifts, presents, or entertainment, and any other benefits, in order to maintain independence in the performance of their duties. If any person is found to have received a benefit exceeding what is reasonable or customary — which must not exceed a value of THB 3,000 — that person may be investigated or disciplined in accordance with the Company's policies and regulations.
- Anyone who becomes aware of an act that constitutes, or appears to constitute, corruption, impropriety, or suspected fraud must not disregard or ignore such conduct, and must promptly notify a supervisor or use the channel designated by the Company.

1.4 Gifts and Entertainment

- The Company's Personnel must not solicit, accept, or agree to accept money, goods, or any other benefit from contractors, business partners, joint-venture partners, customers, or other parties with business dealings with the Company, under any circumstances, whether or not intended to induce the recipient to act or refrain from acting, or any act of a similar nature, including not offering bribes or similar benefits to fellow employees or any external party, particularly government officials.
- The Company's Personnel may accept or give gifts, property, or other benefits on festive or customary occasions, or to maintain goodwill and good personal relationships, provided the value does not exceed THB 3,000 and is not in cash or cash equivalent, and provided that accepting or giving such a gift does not influence any business decision of the recipient.
- The giving of gifts, property, or any other benefit to external parties, including government officials, whether in Thailand or overseas, must not violate the law or local customs and traditions.

- Where the Company's Personnel receive a gift, property, or any other benefit on a customary occasion that exceeds a reasonable value from a party with business dealings with the Company, this must be reported to a supervisor through the chain of command; where the supervisor considers it inappropriate to keep, it must be returned to the giver immediately.
- Units that must liaise with business partners, customers, joint-venture partners, or other persons connected with the Company's business must regularly inform such persons of this Code.
- Where any of the Company's Personnel, or any supervisor, intentionally, negligently, or otherwise fails to comply with this practice, that person shall be deemed to have failed to comply with the Company's regulations, and may be investigated or disciplined in accordance with the Company's policies and regulations.

1.5 Anti-Trade Competition (Fair Competition)

The Company intends to promote free and fair trade competition for the benefit of consumers and society as a whole, adhering to good trade practices under the Trade Competition Act B.E. 2560 (2017), as follows:

- Not conducting business by unfairly exercising market dominance, including:
 - Fixing or maintaining an unfair price level for the purchase or sale of goods or services;
 - Setting unfair conditions requiring another business operator that is its trading partner to restrict services, production, purchases, or sale of goods, or to restrict opportunities to choose to purchase or sell goods, to receive or provide services, or to procure credit from other business operators;
 - Suspending, reducing, or restricting services, production, purchase, sale, delivery, or importation into the Kingdom without reasonable cause, or destroying or damaging goods in order to reduce supply below market demand;
 - Interfering with the business operations of another person without reasonable cause.
- Not entering into any trade agreement that constitutes monopolization or reduces or restricts competition, including:
 - Fixing a purchase or selling price, or any trade condition, that affects the price of goods or services;

- Limiting the quantity of goods or services that each business operator will produce, purchase, sell, or provide, as agreed;
 - Setting collusive agreements or conditions to enable one party to win a bid or tender for goods or services, or to prevent one party from competing on price in a bid or tender for goods or services;
 - Allocating areas in which each party will sell, or designating buyers or sellers in that area;
 - Provided that this shall not apply where exempted or prescribed by law or government regulation, such as acts between business operators connected through policy or command authority, or acts intended to develop production, distribute goods, or promote technical or economic progress, or agreements or business arrangements permitted under ministerial regulation.
- Not engaging in any act that causes damage to other business operators, including:
 - Unfairly obstructing the business operations of other business operators;
 - Unfairly exercising market power or superior bargaining power;
 - Setting trade conditions that unfairly restrict or obstruct the business operations of others;
 - Any other act as announced by the Trade Competition Commission.

1.6 Whistleblowing

- The Company's Personnel, shareholders, customers, business partners, stakeholders, or other persons doing business with the Company may report to the Company any act involving violation of the law, regulatory requirements, breach of the Code of Conduct, ethical misconduct, embezzlement, or fraud by an employee or other person — whether an act that actually occurred or a suspicious event — that has caused, or may cause, monetary or non-monetary damage to the Company.
- Complainants and whistleblowers will have their rights protected: the Company will not impose disciplinary action against them, and will not allow retaliation against a person who lodges a complaint in good faith. All stages of the investigation will be handled only by relevant, authorized persons, and information will be kept confidential.
- Where it is proven that a complaint received was false information, submitted with intent to distort facts or to defame another person, the complainant or whistleblower shall be deemed to have

breached this Code of Business Conduct and shall be subject to penalties under the Company's regulations or applicable law.

- Reports may be submitted through 3 channels:
 - By e-mail, to: whistle-blower@proinside.co.th
 - By post, addressed to: the Audit Committee, Pro Inside Public Company Limited, No. 55, A.A. Capital Ratchada Building, 5th Floor, Ratchadapisek Road, Din Daeng, Din Daeng, Bangkok 10400
 - Online, at: <http://www.proinside.co.th/contact/whistleblowing>

2. Appropriate Use of Information and Assets

Practice Guidelines:

2.1 Protection and Use of the Company's Information and Assets

- The Company's Personnel are responsible for taking care of the Company's assets so that they are not damaged or lost, and for using such assets efficiently for the full benefit of the Company, and must not use the Company's assets for their own benefit or that of others. Such assets include both tangible and intangible property, such as movable and immovable property, technology, technical knowledge, title deeds, patents, and copyrights, as well as confidential information not disclosed to the public, such as business plans, financial forecasts, and human resources data.
- The Company's Personnel are responsible for safeguarding the Company's confidential information from leaking to external parties, which could cause damage to the Company or stakeholders, even after ceasing employment or relationship with the Company. This includes any information relating to the Company that has not been disclosed to the public, whether or not it is designated as confidential, if it can reasonably be regarded as confidential information.
- Except for information that has been disclosed to the public, all of the Company's information shall be deemed for internal use only, and all of the Company's Personnel must use such information strictly within the scope of their assigned duties and responsibilities, and must not use or disclose it to any other person, or use it for personal benefit.
- The Company's Personnel must carefully safeguard any personal data received, and must use personal data only within the scope of the law and for the purposes for which such data was

collected, used, or gathered, in compliance with the Company's personal data protection policy and information technology security measures.

2.2 Insider Information

- The Company's Personnel must avoid using inside information, or information that has not yet been disclosed to the public, for their own benefit in buying or selling the Company's shares, or providing inside information to another person for the benefit of buying or selling the Company's shares.
- Directors and executives, as defined by the Office of the Securities and Exchange Commission, are required to report their trading of the Company's securities within 3 business days from the date of the trade, in order to prevent the purchase or sale of shares using inside information and to avoid any question over the propriety of insider share trading.
- Directors, executives as defined by the Office of the Securities and Exchange Commission, and employees who are in a position to become aware of inside information — such as the company secretary, investor relations staff, and accounting and finance staff — should refrain from buying or selling the Company's shares during the 30 days before the disclosure of financial statements or of the Company's status or other material information, and should wait at least 24 hours after information is disclosed to the public before buying or selling the Company's shares.

2.3 Information and IT Security

- The Company has established an information technology security policy to ensure that the information technology systems of the Company, its subsidiaries, and its associated companies are appropriate, efficient, secure, and able to support continuous business operations, in compliance with standards covering cyber security. An IT Security working group is responsible for overseeing compliance with this policy and managing information security incidents.
- The Company is committed to applying information technology as part of its strategy and operations to improve work processes and enhance business opportunities carefully and prudently, with appropriate security measures in place.
- The Company's Personnel must strictly comply with applicable laws, relevant policies, and the Company's guidelines on the use of information technology, in order to prevent problems that may arise from improper use of information technology systems and from various threats.

3. Conduct Toward Colleagues and the Working Environment

Practice Guidelines:

3.1 Employee Conduct and Treatment of Colleagues

- Employees should perform their duties professionally, with commitment, integrity, and transparency at all times.
- Employees should refrain from giving gifts to supervisors, or accepting gifts from subordinates.
- Employees should respect the rights of other employees, value them, and treat colleagues with courtesy and fairness. The Company promotes a good working environment that is open to communication, cooperation, and mutual support.
- Supervisors should conduct themselves in a manner that earns employees' respect, and employees should not engage in any act that shows disrespect towards a supervisor.
- Employees should be disciplined and comply with the organization's rules and good customs, whether or not formally recorded in writing.
- No one should engage in any act constituting bullying, harassment, discrimination, or any conduct that creates an inappropriate or hostile working atmosphere. Differences of opinion should be expressed politely and resolved through constructive discussion.
- Employees should avoid any act that could damage the Company's reputation and image, or that could become a problem for the Company in the future.

3.2 Safety, Health, and Workplace Environment

- The Company will develop its occupational health, safety, and working-environment management system to prevent work-related injury and illness, in accordance with the laws and requirements relating to the hazards of the workplace and to persons working on behalf of the establishment.
- The Company carries out occupational health, safety, and working-environment activities, regarding participation in such activities as the responsibility of every member of personnel.
- The Company continually assesses and improves risk prevention to meet standards, in order to prevent accidents that may occur at work and in related activities.
- The Company runs ongoing campaigns to promote good quality of life and health for its personnel.

- The Company provides adequate and appropriate resources to build awareness of compliance with the standards and methods prescribed for occupational health, safety, and the working environment.

4. Responsibility to Stakeholders and Society

Practice Guidelines:

4.1 Customer Relations and Product Quality

- Deliver quality products that meet or exceed customers' expectations, under fair terms.
- Provide customers with accurate, sufficient, and up-to-date information about products and services so that customers have enough information to make decisions, without exaggeration in advertising or in communications through other channels that could mislead customers as to the quality, quantity, or any conditions of the goods or services.
- Maintain the confidentiality of customer information and not use it for one's own benefit or improperly disclose it to any related party.
- Respond promptly to customer needs, and provide an effective system and channel for customers to lodge complaints regarding the quality of goods and services.

4.2 Conduct Toward Business Partners and/or Creditors

- Treat business partners and creditors equitably and fairly, on the basis of fair returns for both parties, and strictly comply with agreed contracts or conditions. Where any condition cannot be complied with, promptly notify the business partner and/or creditor in advance so that a solution can be jointly considered.
- In business negotiations, refrain from soliciting, accepting, or paying any dishonest benefit in dealings with business partners and/or creditors. Where there is information that an employee has solicited, accepted, or paid any dishonest benefit, this should be disclosed to the Company through its whistleblowing or complaint channel, so that the Company may investigate the facts and proceed in accordance with the steps set out in the whistleblowing policy.

4.3 Conduct Toward Trade Competitors

- Conduct business within the framework of fair, transparent competition, without taking undue advantage.

- Do not seek a trade competitor's confidential information through dishonest or improper means, such as paying a competitor's employee for information.
- Do not damage a trade competitor's reputation through malicious accusations, spreading false information, or attacking competitors.
- Do not enter into any agreement with a competitor or any person that reduces or restricts trade competition.
- In dealings with competitors, the Company's Personnel must not disclose or allow the Company's confidential information to fall into a competitor's hands.

4.4 Sustainable Organizational Development in Accordance with ESG (Environment, Social and Governance) Principles

All directors, executives, and employees of the group of companies are responsible for supporting, driving, promoting, and complying with the policies established for sustainable organizational development in accordance with the prescribed approach, in order to build a sustainable society, growing together in a stable manner across the environmental, social, and governance dimensions throughout the business value chain, thereby delivering maximum benefit to all groups of stakeholders, as follows:

1) Environment

- Make the most efficient use of resources, seek ways to reduce the use of resources and energy, prevent pollution, and reduce greenhouse gas emissions.
- Select machinery and production processes that generate the least waste, and continually seek new methods to raise the efficiency of environmental management and quality control to a level consistent with generally accepted standards.
- Conduct business giving importance to energy conservation alongside environmental responsibility. All employees are therefore required to comply with the Company's environmental and climate policy, or other related policies, as well as the relevant standards and environmental laws, strictly.

2) Social

- Have regard for human rights and human dignity; care for and treat every group of stakeholders — including employees, surrounding communities, and society — fairly and equally, without discrimination on the basis of race, colour, religion, sex, age, nationality, gender, or any other status.

Comply strictly with the Company's human rights policy, and maintain oversight processes to give confidence that the Company is not directly or indirectly involved in any human rights violation.

- Look after the health and safety of the employees and workers of the group of companies, giving importance to respecting employees' rights and complying with labour protection laws as required.
- Promote the development of personnel capabilities at every level, with an evaluation system consistent with the Company's established criteria, adhering to the principles of good corporate governance and consistent with the group's development approach, in order to deliver value to communities and society alongside the delivery of quality products and services that meet international standards.
- Give importance to working together with communities and society, so that the group of companies, communities, and society can develop together on an ongoing basis.

3) Governance

- Conduct business in accordance with the principles of good corporate governance, and provide relevant policies, regulations, and announcements for the Company's Personnel to observe and follow.
- Uphold the principles of integrity and transparency in conducting business and performing work, while complying with the laws, regulations, articles of association, methods, and standards prescribed by regulatory authorities, and in accordance with generally accepted international standards.
- Promote and support business development together with partners, business partners, and stakeholders throughout the business value chain in a manner that is correct, transparent, and auditable, so that business is conducted in accordance with sustainable development principles.
- Give importance to compliance with the Code of Business Conduct and anti-corruption efforts, focusing on promoting an organizational culture in which personnel at every level recognize the harm caused by corruption, and instilling proper values to encourage strict compliance among relevant stakeholders.

Discipline and Penalties

All directors, executives, employees, workers, and representatives of the Company must acknowledge, understand, and strictly comply with this Code of Business Conduct. Any violation, breach, or act contrary

to this Code will be considered for disciplinary action in accordance with the work rules, regulations, announcements, or orders prescribed, which may include termination of employment in serious and necessary cases. In addition, a person who breaches this Code of Business Conduct may also be subject to legal penalties where the act also constitutes an offence under the law.

If you become aware of any act that is suspected to be, or that constitutes, a violation of this Code of Business Conduct, please report it immediately through the channel designated by the Company under its whistleblowing policy.

Mr. Wisudhi Srisuphan

Chairman of the Board