

**จรรยาบรรณทางธุรกิจ**

**(Code of Business Ethics)**

**AEON Thana Sinsap (Thailand) Public Company Limited**

## Introduction

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AEON Thana Sinsap (Thailand) Public Company Limited places the utmost importance on conducting our business with ethics, transparency, and a strong sense of responsibility toward society and all stakeholders. To ensure that our operations meet elevated standards and foster trust across all relevant parties, the company have established comprehensive guidelines that support the principles of sustainable business conduct.

These guidelines serve as a framework for employees, executives, and all stakeholders, providing clear direction in their professional activities. They encompass critical areas such as responsibilities to shareholders, customers, business partners, and creditors, along with specific measures for the prevention of fraud, the promotion of fair competition, and compliance with applicable laws and regulations.

Our commitment to integrity and ethical business practice is unwavering. The Company strives to cultivate a corporate culture that encourages employees at all levels to uphold these principles in every aspect of their work. Furthermore, our stakeholder engagement practices form a cornerstone of our approach, reinforcing our resilience and long-term value creation for society.

### 1. Guidelines for Stakeholder Engagement

The company values all stakeholders and conducts business with ethics, responsibility, and fairness to establish positive and sustainable relationships with all relevant parties, as follows:

#### 1.1 Guidelines for Shareholders

The company is committed to conducting business with transparency, integrity, and accountability, striving to create long-term value for the benefit of all shareholders. We adhere to good corporate governance principles to ensure appropriate and sustainable returns.

#### 1.2 Guidelines for Customers

The company is dedicated to providing high-quality, standardized, and safe products and services while prioritizing customer satisfaction and needs. Additionally, we uphold the confidentiality of customer information and conducts business fairly.

#### 1.3 Guidelines for Business Partners

The company values fair and transparent dealings with business partners, adhering to ethical business practices and refraining from improper or unethical methods. We also strictly comply with contractual terms and conditions.

#### 1.4 Guidelines for Creditors

The company upholds financial discipline and builds relationships with creditors based on trust and cooperation. We strictly comply with financial contract terms, provides accurate and complete information, and collaborates on mutually beneficial solutions to enhance financial stability.

#### 1.5 Guidelines for Employees

The company values our employees as valuable resources and is committed to creating a safe and supportive work environment that fosters employee potential. We also promote equality and fairness in the workplace.

#### 1.6 Guidelines for Fair Competition

The company supports fair business competition in accordance with ethical principles and applicable laws. We refrain from engaging in unfair practices, undermining competitors' credibility, or violating intellectual property rights and confidential information of competitors.

#### 1.7 Guidelines for Society and the Environment

The company acknowledges our responsibility toward society and the environment by conducting environmentally friendly business operations, promoting efficient resource utilization, and supporting sustainable social development. We also cooperate with relevant organizations to enhance societal and environmental development in all aspects.

## **2. Conflict of Interest**

In the course of conducting business, employees or executives may encounter situations where personal interests intersect with the company's interests, potentially leading to conflicts of interest, if not properly addressed, can undermine fairness in decision-making and erode stakeholder trust. As a publicly listed company, we are committed to identifying, managing, and mitigating conflicts of interest to uphold transparency, integrity, and independence in business operations.

Employees and executives must ensure that any business transactions, whether external parties or the company, do not conflict with the company's interests. All such transactions must comply with applicable laws, regulations, and the terms of the employment contract.

To ensure transparency and avoid conflicts of interest, employees and executives are required to disclose any holding of directorships or equivalent positions in external organization to the company in accordance with the criteria prescribed by the relevant regulatory authorities. This allows the company to assess potential risks and take appropriate measures to ensure compliance with applicable laws and regulations, including those related to connected transactions.

## **3. Combating Fraud and Unethical Conduct**

The company is committed to conducting business with integrity, transparency, and adherence to good corporate governance principles. We have established policies to prevent and combat fraud while fostering a corporate culture that prioritizes business ethics.

### **3.1 Anti-Corruption and Bribery**

The company strictly prohibits all forms of bribery and corruption. All employees must comply with applicable laws and relevant ethical guidelines.

#### **3.1.1 Facilitation Payments and Bribery**

The company prohibits employees and executives from giving or receiving facilitation payments or bribes in any form, including money, assets, or other benefits that could compromise fairness in business operations.

#### **3.1.2 Offering or Exchanging Entertainment and Gifts**

The company has established guidelines for offering or receiving gifts and entertainment, ensuring that such activities remain appropriate and do not create conflicts of interest or influence business decisions.

#### **3.1.3 Embezzlement**

The company is committed to preventing and detecting embezzlement within the organization by implementing strict internal controls and encouraging a secure system for reporting unethical activities.

#### **3.1.4 Donations**

The company supports charitable donations that comply with established criteria and avoids any donations that could be used as a means for bribery or unethical personal gain.

#### **4. Human Rights**

The company prioritizes respect for and compliance with international human rights principles. We are committed to conducting business in a manner that upholds human dignity and promotes equality across all sectors of society.

The company recognizes our role as an organization that impacts multiple stakeholders, including employees, customers, business partners, creditors, shareholders, and surrounding communities. Therefore, we are dedicated to fostering a corporate culture that upholds human rights, supports a safe and fair working environment, and treats all individuals with respect and integrity, without discrimination or any form of rights violations.

##### **4.1 Employee Rights**

The company values employees' rights to fair employment, free from discrimination and harassment of any kind. We support the creation of a work environment that respects human dignity and promotes opportunities and benefits.

##### **4.2 Fair Employment and Compensation**

The company upholds transparent and fair employment policies, determining compensation and benefits in accordance with appropriate standards and labour laws. We also emphasize the development of employees' skills and potential.

##### **4.3 Prevention of Child and Forced Labour**

The company does not support or engage in any form of child or forced labour. We have established internal monitoring measures to ensure that our supply chain is free from human rights violations in this regard.

##### **4.4 Workplace Safety and Health**

The company is committed to providing a safe and hygienic work environment and prioritizing employees' health and well-being.

##### **4.5 Rights of Surrounding Communities**

The company conducts business in a manner that does not negatively impact surrounding communities and actively promotes community participation in sustainable development projects.

##### **4.6 Fair Treatment of Stakeholders**

The company is committed to ethical and transparent business practices, ensuring fairness without discrimination or exploitation.

##### **4.7 Political Activities**

The company maintains a politically neutral stance and does not support, donate to, or favour any political party to ensure business transparency and fairness. We respect the rights and freedoms of all executives and employees to participate in political activities as permitted by the constitution. Employees may freely express opinions and engage in democratic processes. However, such participation must be in a personal capacity, without using the company's name, position, or resources to support or imply any political affiliation or endorsement.

## **5. Protection and Maintenance of Company Assets**

The company mandates that all employees shall utilize the company's assets responsibly, efficiently, and exclusively for business purposes. All assets must be properly used, maintained, and protected against loss, damage, misuse or unauthorized use, and managed in a manner that safeguards the company's interests.

Employees are strictly prohibited from using company assets for personal gain or engaging in activities that may cause damage to the assets or negatively impact the company's operations. The protection and maintenance of assets include office equipment, tools, information technology, and other company resources, which must be utilized and managed efficiently and transparently.

The company is committed to fostering a culture of responsibility in asset usage and management to ensure sustainable business operations.

## **6. Use of Insider Information and Trading of Company Securities**

The company places a high priority on safeguarding the confidentiality of insider information and ensuring it is not improperly used for personal gain or obtaining an unfair advantage in securities trading. Insider information refers to non-public, material information that could potentially influence the company's stock price.

Employees and executives are prohibited from using insider information for personal benefit or disclose such information to external parties, including family members, friends, or any individuals who might use it for trading the company's securities.

To maintain fairness in the capital markets, the company has implemented controls and oversight mechanisms to prevent unlawful securities trading. We also cooperate with regulatory authorities to ensure that our operations remain transparent and comply with applicable laws.

## **7. Public Disclosure of Information**

The company emphasizes the importance of transparent, accurate, and timely dissemination of verified information to build trust among all stakeholders. In line with our commitment to ethical conduct and social responsibility, the company ensures that important information is communicated through appropriate and authorized channels.

To prevent the spread of misinformation and minimize the risks of miscommunication, all employees and executives are prohibited from releasing of any information that could cause misunderstandings or damage the company's reputation.

Furthermore, the company strictly complies with all applicable laws and regulations governing information disclosure, including capital market regulations and corporate governance principles. This commitment ensures that communication with shareholders, investors, customers, and the public is accurate, reliable, and trustworthy.

## **8. Related Party Transactions**

The company acknowledges the critical importance of conducting transactions between affiliated companies or related entities with transparency and fairness to protect interest of all stakeholders. We ensure that related party transactions are carried out in compliance with established criteria, including fair pricing, neutral terms, and adherence to good corporate governance principles.

All related party transactions must be fully disclosed and comply with relevant accounting standards and legal requirements. This approach prevents conflicts of interest and fosters fairness for shareholders and other stakeholders. The company maintains robust internal controls and a transparent audit process to ensure that related party transactions are executed appropriately and in line with the business ethical standards.

## **9. Anti-Money Laundering**

The company prioritizes compliance with laws and regulations related to anti-money laundering and is committed to conducting business transparently while adhering to international standards. All employees have a duty to remain vigilant and prevent the company from being used as a vehicle for money laundering or illegal activities.

The company has implemented strict customer and business partner due diligence measures, including reporting suspicious transactions to relevant authorities to mitigate risks associated with money laundering or the financing of illicit activities. Additionally, the company promotes employee awareness and understanding of proper anti-money laundering practices to safeguard the organization's stability and credibility.

## **10. Intellectual Property**

The company places great importance on protecting both our intellectual property and that of external parties to promote creativity, innovation, and business competitiveness. The company's intellectual property includes patents, copyrights, trademarks, trade names, trade secrets, software, commercial data, and proprietary knowledge derived from our business operations.

All employees are responsible for maintaining confidentiality and appropriately using the company's intellectual property. They are strictly prohibited from using it for personal gain or disclosing it to external parties without authorization. The company is committed to preventing intellectual property infringement and has implemented strict measures to safeguard critical information and innovations.

Additionally, the company respects the intellectual property rights of external parties, including business partners and affiliates. Employees are required to comply with all applicable laws and regulations and must not copy, modify, or use another party's intellectual property without proper authorization.

## **11. Compliance with Laws, Regulations, and Policies**

The company is committed to conducting our operation in full compliance with all applicable laws, regulations, and policies to ensure that our operations are conducted in a legal, transparent and fair manner. All employees are obligated to adhere to the legal and regulatory requirements applicable to the company's business operation.

The company encourages employees to develop knowledge and understanding of the laws, regulations and the company's policies related to their roles and responsibilities and to avoid any actions that may violate legal requirements or negatively impact the company's reputation. If employees observe or suspect any violation or non-compliance, they are required to report them immediately to management or the relevant department in accordance with the company's established reporting protocols.

## **Business Ethics Oversight and Implementation**

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### **Board of Directors**

The Board of Directors is responsible for establishing, overseeing, and ensuring the effective implementation of business ethics within the organization. Their key responsibilities include:

- Establishing ethical policies and integrating business ethics into the company's strategic direction.
- Promoting a corporate culture that prioritizes integrity, transparency, and ethical business conduct.
- Overseeing compliance with ethical guidelines of the organization.
- Providing oversight and support to management in enforcing ethical practices and addressing ethical concerns that arise.

### **Corporate Governance Committee**

The Corporate Governance Committee is responsible for developing, implementing, and continuously improving the company's ethical policies and governance standards. Their key responsibilities include:

- Reviewing and updating ethical guidelines to ensure alignment with evolving business conditions and regulatory requirements.
- Monitoring and ensuring compliance with ethical guidelines.
- Overseeing the implementation of ethical policies and ensuring effective communication and enforcement.
- Supporting training and awareness programs to enhance ethical understanding among employees at all levels.
- Providing guidance and interpretation of ethical policies in cases of uncertainty or ambiguity.
- Receiving complaints and conducting investigations in cases of ethical violations, ensuring a fair and transparent review process.

### **All Employees**

Employees at all levels play a crucial role in promoting and maintaining business ethics within the company. Their key responsibilities include:

- Understanding and strictly adhering to the company's ethical policies and guidelines.
- Conducting business with honesty, transparency, and respect for all stakeholders.
- Reporting any suspected ethical violations or inappropriate conduct through the company's designated channels.
- Participating in business ethics training programs to ensure accurate and up-to-date knowledge.
- Supporting a corporate culture that emphasizes integrity and encourages ethical decision-making in business operations.

## **Reporting Non-Compliance with Business Ethics**

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The company is committed to conducting business with ethics and transparency, encouraging employees and all stakeholders to strictly adhere to the established code of business ethics. In case where unethical behavior or violation of applicable laws are observed or suspected, the company encourages employees and stakeholders to report such incidents through designated channels.

To promote a culture of integrity, the company ensures that whistleblowers are fully protected against retaliation. All reports are treated with fairness and confidentiality, creating an environment where individuals can raise concerns without fear of adverse consequences.

Employees and stakeholders can submit reports of non-compliance with business ethics through the company's designated channels, such as email and online complaint platforms. The company will promptly and thoroughly investigate and take appropriate actions to ensure that business operations comply with ethical standards and corporate governance principles.