



## Company Code of Conduct

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P.S.P. Specialties Public Company Limited

## Company Code of Conduct

P.S.P. Specialties Public Company Limited (the “Company”) and its subsidiaries ( the “Group”) have a code of conducting business that Group directors, executives, and employees must adhere to as a guideline for performing their duties. Representatives of the Group. The code of conduct is established as a good practice promoting transparency in business operations and building confidence among investors, stakeholders, and all parties involved. The Code of Conduct guidelines are as follows:

### Terms and Definitions:

<b>Company or PSP</b>	denotes	P.S.P. Specialties Public Company Limited.
<b>Subsidiaries</b>	denotes	Companies where their business is controlled by either: (1) PSP; or (2) a company under (1); or (3) a company under (2), with a succession of control in a descending order starting with companies in (1) under the direct control of PSP.
<b>Group</b>	denotes	P.S.P. Specialties Public Company Limited and its subsidiaries.
<b>Executive(s)</b>	denotes	The Chief Executive Officer and the first four executives immediately under the Chief Executive Officer, and all fourth-level executive equivalent positions, including those in accounting and finance.
<b>Management</b>	denotes	Section managers and equivalent, up to the Chief Executive Officer.
<b>Employee(s)</b>	denotes	Permanent, temporary, and special contractors under management.
<b>Associate(s)</b>	denotes	A person with any of the following relationships: (1) A person or a director of a juristic person with control power over the company. (2) The spouse, child, or adopted minor of a director, executive, or a person under (1). (3) A juristic person where the person under (1) or (2) has control power over the business. (4) Any other person with characteristics specified by the Capital Market Supervisory Board.

<b>Stakeholder(s)</b>	denotes	Shareholders, investors, business partners, customers, creditors, competitors, the government, society at large, and the public.
<b>Disclosure</b>	denotes	The disclosure of information details related to activities of the disclosure related to the company's business activities according to the Public Company Act. Limited B.E. 2535 and the Securities Act B.E. 2551, as well as the rules and regulations of the Stock Exchange of Thailand and the Securities and Exchange Commission.
<b>Conflict of Interest</b>	denotes	Any undertaking that involves personal stakeholdings or that of a related person influencing the decision-making process.
<b>Inside Information</b>	denotes	Any information that has not been released to the public, classified for Company purposes only, and not to be used in any way for personal use, including temporary Company information stored and undisclosed, such as pending SET-submission financial statements, dividend payments, potential commercial and acquisition contracts and prospects.
<b>Controlling Power</b>	denotes	<p>(1) Holding over 50 percent of total shares with voting rights in a juristic person.</p> <p>(2) Having control over the majority vote in the shareholders' meeting of a juristic person, directly or indirectly, for any reason.</p> <p>(3) Having control over the appointment or removal of more than half of all directors, directly or indirectly.</p>

#### CCC for Stakeholders

1. **Shareholders** Conduct business under the Corporate Governance principles with transparency, efficiency, and creditability, to create sustainable business value and strive for outstanding performance and stable growth, financial positions, and Group sustainability with the best benefits for the shareholders over the long run. The disclosure of Company-related information, for example, is conducted under these principles.
  
2. **Employees** All employees are to be treated equally and fairly, respectful of human rights, and compensated with appropriate welfare and benefits appropriate by legal stipulations and comparable to competitors in the same market and industry standard. The Group prioritizes the health and safety of all employees, as well as performance, development, and potential. Regular training courses and seminars are offered to hone necessary skills

and knowledge. The Group proffers career opportunities with clear professional development and career paths to motivate and retain outstanding professionals to remain with and further develop the organization together. Anti-fraud and corruption guidelines are also set to instill employee awareness under the Corporate Compliance Policy, reflected, e.g., in the strict procedures and prohibitions against insider trading.

- 3. Business Partners** Provide a fair selection process for Group business partners to compete under the same information and evaluation criteria. A standard contract suitable and fair for all candidates is prepared while a monitoring system is in place to ensure contractual terms and conditions are fully met and prevent any potential fraud or misconduct throughout the selection process. The Group procures products from trading partners with strict compliance to contractual terms and obligations, ensuring related business information of the trading partner is not used for any unwarranted purposes.
- 4. Customers** Conduct business in a customer-responsible manner by maintaining the quality and standard of products and services and focusing on long-term customer satisfaction, responding to customer needs as thoroughly and inclusively as possible. The Group prioritizes health, safety, and fairness as the guiding principles for customer data privacy, product information provision, and accurate and complete customer service and after-sales service, including monitoring customer satisfaction to improve products and services in the future. Feedback channels are available for customers to comment and report issues with their experience, and for the Group to intake valuable information in taking prompt corrective-preventive actions required and making amends.
- 5. Creditors** Strictly comply with contractual terms, conditions, and obligations to creditors in its repayment of principal, interest, or collateral, or all, contingent on relevant clauses, as well as refraining from dishonest or unforthcoming methods or concealing information or facts, which can damage a creditor. Where the Group is unable to comply with any term or condition under a contract, the creditor is notified in advance without delay to consider mutual solutions together.
- 6. Competitors** Conduct business within the Code of Conduct framework of ethical, transparent, lawful, and good competition, including supporting and promoting a free and fair competition policy, without retaining confidential information of a competitor by unlawful means.

7. **Central Policy** Conduct business under the principles of Good Corporate Governance, strictly complying with relevant laws and regulations and responding to the central policy under the Code of Conduct and Group business practices.
  
8. **Social Responsibility** Uphold Corporate Social Responsibility by prioritizing the safety and sustainability of the community, society, and the environment, for the well-being of people involved or affected by Group operations. Foster a professional corporate culture and awareness of its responsibility to the ecosystem and social fabric of the community it relies upon, ensuring that Group employees have a practical perspective and understanding, beyond the duty to comply, of underlying bodies of law and regulations. The PSP Group participates in activities that rebuild, maintain, and promote social fabrics, local culture, and communal ecological systems where it operates.

#### CCC for Group Personnel

1. Comply with Group bylaws, policies, requirements, announcements, orders, and overbearing supervisors guiding business operations.
  
2. Carry out duties with integrity, dutifully, responsibly, and cautiously, and report without delay developments that may lead to property or loss or defamation of the Group.
  
3. Be a polite and respectful professional to colleagues, eager to work as a team, adaptable to teamwork, and accepting of different opinions.
  
4. Perform duties with determination and perseverance, always maintaining order, pattern, and good governance of the Group.
  
5. Protect the interests and secrets of the Group, its customers, or any related party or matter under strict compliance under the Code of Conduct guidelines for classified business material. The disclosure or dissemination of information about Group finance, business, or persons may never take place without authorization and must be handled professionally with due diligence under procedures and guidelines. All employees are obliged to maintain the confidentiality of nonpublic Group information, during and after their employment. Unwarranted disclosure, where classified information is transmitted to or used by a third party in any manner other than performing authorized duty on the Group's behalf, will result in the responsible employee being held accountable for all incurred damages or loss, or both, in all respects.

6. Inside information is only used by the Group for intended or authorized purposes and is never used for unauthorized trading on the stock exchange, either of Company securities or that of any other, or entering any derivative contract, regardless of the beneficiary or intent.
7. Handle Group assets with utmost care and protection against damage or loss from humans or natural disasters, and refrain from using any Group equipment or asset for personal purposes or the benefit of any unintended party or anyone uninvolved in Group business operations.
8. Manage and perform duties and business operations under the code of conduct to promote business ethics and corporate awareness at all Group levels, monitoring, overseeing, and managing Group conflicts of interest that may arise in the process.
9. Govern and closely supervise subordinates with fairness and without prejudice.
10. Lead by example and supervise strict compliance in the handling and using of Group computer systems computer data, or computer traffic data. Train and help employees under command understand and comply with Group policy, bylaws, regulations, announcements, and orders. Ensure the usage of Group computer systems comply with computer-related, copyright, and other relevant laws to prevent Group defamation.
11. Refrain from personal or any type of work irrelevant to the Group's interest during working hours.
12. Refrain from business undertakings of the same nature or in competition with that of the Group, or both, regardless of the beneficiary, including shareholding management power that may cause direct or indirect damage to the Group.
13. Refrain from behavior that may in any way defame one's self or the Group.
14. Refrain from misinformation or concealing facts that should be disclosed to the Group.
15. Refrain from negligence, dereliction of duty, or any inappropriate action in performing one's duty to a complete, proper, and honest outcome.
16. Refrain from unforthcoming or misrepresented facts for self-interest or that of others, potentially leading to either direct or indirect damage to the Group.
17. Refrain from actions that obstruct Group personnel from carrying out authorized work or incite misled or unethical undertaking among them.

18. Refrain from violating civil, criminal, or Group bylaws, causing damage to oneself or others, regardless of intent.
19. Refrain from disclosing salary, wage, benefit, remuneration, or rate increase of oneself or others, regardless of intent.
20. Refrain from requesting or accepting valuables, assets, special receptions, or any other benefits from customers, business partners, competitors, or any other person doing business with the Group, except fashionable customary exchanges of traditional gifts, normal business receptions, or expenses to promote commerce or business reputation:
  - Normal business entertainment or occasional promotional expenses under Delegation of Authority Guidelines for specified limits.
  - Traditional gift limit per occasion not exceeding 3,000 Baht (three thousand Baht, net).
21. Refrain from offers, bribes, corruption, or any act damaging to the Group, either directly or indirectly, through a third party, undue influence of the authority, a client, or a counterparty considered in conflict with Group Policy.
22. Refrain from making additions, deletions, or corrections to any official record or information to change or distort Group performance, or deviate the accounting record for any purpose, regardless of intent.
23. Refrain from unforthcoming payments or business arrangements that could be perceived as a normal business procedure.
24. Refrain from copying work or intellectual property of others, as well as safeguard Group intellectual property and employee performance information.
25. Refrain from wrongfully seeking benefits for oneself or others.
26. Non-purchasing agencies are to refrain from suppliers' or business partners' support. Should such support benefit or be necessary to the Group, such agency may consult with purchasing agencies for proper implementation, except for joint marketing, whereby the Commercial and Business Development Department is the responsible agency.
27. Refrain from neglecting or facilitating any person seeking advantage through unauthorized or illegal access to or disturbance of Group computer systems or data or traffic data, or deliberately

supporting or agreeing to violate a service provider contract under computer-related, copyright, or other pertaining legal provisions.

28. Group business operates with political neutrality by refraining from participating in or favoring any political party, politician, or person with political power, or supporting one with Group funds or resources, either directly or indirectly. While the exercise of political rights by Group employees, such as applying for elections or voting, among others, are encouraged, the Group prohibits employees from using Company or subsidiary names or Group resources for election campaigns or political purposes in any way that may defame the Group.

#### **Disciplinary Action**

- (1) Misdemeanor: the person is given a verbal warning and possibly a written reprimand stating the nature and principal grounds for the violation, with the opportunity to object or counter the accusations with the immediate supervisor. For the second violation where corrective action for the first offense remains neglected after a formal warning, the violator is subject to disciplinary action per Company disciplinary standards.
- (2) Felony: serious violations of regulations, and disciplinary standards, namely bribery, fraud, corruption, intellectual property infringement, unauthorized disclosure of classified information, and insider trading, as well as unforthcoming or concealment of important information or documentation from supervisors, and any act that may result in Company defamation. The Group may consider employment termination without severance pay or a written warning in advance.

This Company Code of Conduct is approved by the Board of Directors and is effective from the 2<sup>nd</sup> of August, 2022, onwards.

(Mr. Somkiat Hattakosol)

Chairperson of the Board

**P.S.P. Specialties Public Company Limited**