



**SYMPHONY COMMUNICATION
PUBLIC COMPANY LIMITED**

123 Sun Towers Building B, 35th-36th Fl.,
Vibhavadee Rangsit Road, Chomphon,
Chatuchak, Bangkok 10900 Thailand



www.symphony.net.th



Tel. 66 (0) 2101 1111



symphony communication



symphony communication

บริษัท ซิมโฟนี คอมมูนิเคชั่น จำกัด (มหาชน)

123 ชั้นทาวเวอร์ส อาคารบี ชั้น 35-36
ถนนวิภาวดีรังสิต แขวงจอมพล เขตจตุจักร
กรุงเทพฯ 10900



Business Code of Conduct (Revised Version 2023)

(Approved by the resolution of the Board of Directors Meeting dated December 18, 2023)

Excellent Experience

TABLE OF CONTENTS

	Page
Definitions	3
1. Introduction	7
2. Significance of Business Code of Conduct	7
3. Instructions of Conformity to the Business Code of Conduct	7
4. Business Code of Conduct	9
4.1 Compliance with Laws, Rules and Regulations and Respect of Culture and Customs	9
4.2 Respect of Human Rights	10
4.3 Treatment of Stakeholders	11
- Shareholders	11
- Employees	11
- Customers	12
- Suppliers	13
- Business Partners	13
- Creditors	14
- Trade Competitors	14
- Government and Regulatory Agencies	14
- Communities, Society and Environment	15
4.4 Vested Interest and Conflict of Interest	16
4.5 Prevention of Fraud and Corruption	18
4.6 Giving or Acceptance of Gifts or Other Benefits, Hospitality, Entertainment	19
4.7 Charitable Contribution and Sponsorship	21
4.8 Political Neutrality	22
4.9 Maintaining Confidential Information	23
4.10 Safeguarding and Utilization of Company Assets	24
4.11 Use of Information Technology Systems	25
4.12. Respect of Intellectual Properties	27
4.13 Trade Competition	28
4.14 Market Communication	29
4.15 Prevention of Money Laundering	30

DEFINITIONS

Code of Conduct means a compilation of desirable behaviors and actions that are defined as guideline for all personnel and operators of the Company to follow in order to maintain and promote virtue and prestige of the organization

The Company means Symphony Communication Public Company Limited (or Symphony Communication Plc.)

Board of Directors means the Board of Directors of Symphony Communication Plc.

Director means member of the Board of Directors of Symphony Communication Plc.

President means a person who holds the highest executive position of Symphony Communication Plc.

Senior Executive means any person who holds executive position as chief officer or C-Suite of Symphony Communication Plc.

Executive means any person who holds the executive position as head of division or head of business unit of Symphony Communication Plc.

Employee means employee working under employment contract of Symphony Communication Plc.

Personnel means directors, executives, and employees of Symphony Communication Plc., including advisors, representatives, proxy grantors, workers, and any persons who work on behalf of Symphony Communication Plc.

Stakeholder means an individual, group of individuals, or juristic person that can either affect or be affected by business operations of Symphony Communication Plc., both directly or indirectly, or that has interest with the business operations of Symphony Communication Plc., namely shareholder, employee, customer, supplier, business partner, creditor, trade competitor, government and regulatory agencies, community and society.

Customer means buyer or user of products or services of Symphony Communication Plc.

Supplier means distributor or products and service provider, including professional advisor, designer, contractor, sub-contractor, rental or hire purchase provider contracted to provide products or services to Symphony Communication Plc.

Business partner means any juristic person working with Symphony Communication Plc. to achieve a common goal in procuring, delivering, developing, improving or modifying in order to be able to deliver raw materials, products or services as mutually agreed.

Human rights mean dignity, basic rights and freedom inherent to all human beings at birth, and equality regardless of race, religion, sex, color, language, ethnicity, or any other status.

Conflict of interest means a circumstance or activity where personal interest compromise fair decision and duties performance as personnel of the company because they place their own interests or those of any other persons more than the interests of the company.

Executive according to the definition of the Securities and Exchange Commission (“SEC”) means the president, the first four executives succeeding the president, the persons holding equivalent position to the fourth executive, including the persons holding the position of manager or equivalent in accounting or finance department.

Related person means person having relationship with director or executive according to the SEC of Symphony Communication Plc. or its subsidiaries company in any of the following ways:

- (1) Spouse or de facto partner
- (2) Underage children or adopted children
- (3) Ordinary Partnership where director or executive according to the SEC as well as (1) or (2) are partners
- (4) Limited Partnership where director or executive according to the SEC as well as (1) or (2) are partners with unlimited liability or with limited liability provided that their holdings are over 30%
- (5) Limited company or public company where director or executive according to the SEC plus (1) or (2) or (3) or (4) collectively hold more than 30% stakes
- (6) Limited company or public company where director or executive according to the SEC plus (1) or (2) or (3) or (4) or (5) collectively hold more than 30% stakes
- (7) Juristic person as per Section 246 and 247 (of the Securities and Exchange Act) authorized to take actions on behalf of the juristic person

Fraud means committing an act in order to procure any advantage for oneself or another person, to which they are not entitled by law.

Corruption means Giving, offering, promising, or committing to give a bribe to an officer, representative, or agency of government or private sectors, whether directly or indirectly, with intention to influence such person to act or refrain from performing their duties in order to obtain or maintain any unfair benefits.

Corruption also includes accepting or requesting bribe from an officer, representative, or agency of government or private sectors, whether directly or indirectly, with intention to influence such

person to act or refrain from performing their duties in order to obtain or maintain any unfair benefits.

Bribe means gift, reward, incentive, or other benefits, whether monetary or non-monetary, including compensation and facilitation payment that is given with an intention to influence or motivate a person to act or refrain from performing duties in order to obtain or maintain any other unfair benefits.

Gift means money or other forms given on occasions to show favor.

Other benefits mean valuable items, whether financially or non-financially, such as discount, entertainment, services, training, or others of the same nature.

Facilitation payment means unofficial financial payment for an officer, representative or agency of government or private sector with an intention to influence such person to carry out or expedite the procedures or facilitate their routine operations.

Charitable contribution means providing money, assets, services, or others to other agencies or organizations for public charity and public services to aid or support society, community, or people in need without expecting benefits or anything else in return.

Sponsorship means financial support provided to customers, supplier or business partner aiming for commercial benefits or promotion of business relationship, reputation and good image of organization.

Political contribution means providing support, either financial or non-financial, to political parties, networks, influencers or candidates, whether directly or indirectly. This includes advertisement, lending or donating equipment, providing technological services free of charge, etc.

Political participation means participation in any political activities, whether directly or indirectly.

Information technology system means equipment and systems utilized for storing, searching, analyzing, processing, or transferring electronic data, e.g., network, computer equipment, internet, e-mail., software, data files, password, etc.

Intellectual property means outcomes that are the result of invention or creation of the human intellect or mind, such as company name, logo, copyright, patent, trademark, trade secret, work procedures, innovation, or other information that is owned by the right owner.

Copyright means a bundle of exclusive rights the law grants to authors and creators of original works of art which its author creates with his intelligence, knowledge, capacity and effort.

Patent means an important document that the Government Service issues to protect the invention, or product design with characteristics in compliance with the legal requirement. It is a kind of privilege granted of exclusive rights to the inventor or product designer, so that he solely has the right to produce and distribute such products for a limited time.

Trademark means a mark, symbol, or brand used to represent a product or service. A trademark is used to indicate that the product or service with such trademark is different from product or service with other trademark.

Trade secret means trade information which is not yet publicly known or inaccessible by people who are normally connected with the said information. It is the information that has commercial value derived from its secrecy and the secret owner or controller has taken appropriate measures, maintain its secrecy.

Money laundering means the process of changing the state of money or assets obtained illegally to make them appear as if they were obtained legitimately.

1. Introduction

The Board of Directors of Symphony Communication Public Company Limited is intent to uphold, develop, and oversee to ensure that the Company conduct business based on ethics and morality to maintain good reputation and pride which will ultimately lead to an organization with good corporate governance.

Consequently, the Board of Directors has compiled and codified rules, regulations and good practices related to business operations including requirements that serve as a standard of conduct for all personnel of the Company to adhere to and use as a guideline for their work along with the Company's rules and regulations by applying the principle of honesty, morality and ethics, sincerity, and righteousness.

2. Significance of the Business Code of Conduct

1. The Business Code of Conduct serves as guideline for directors, executives and employees to uphold and implement in their work and behavior in accordance with laws and ethical standards.
2. The Business Code of Conduct is a mechanism for creating good corporate governance for an organization because it is a tool for concrete implementation of corporate governance policy.
3. The Business Code of Conduct is an important tool for enhancing operational transparency that helps creating confidence for investors or all related stakeholders, as well as increasing performance efficiency of directors, executives, and employees of the Company; lead to creating added value and sustainable growth for the organization.

3. Instructions of Conformity to the Business Code of Conduct

The Company has determined that it is the duties and responsibilities of all personnel to acknowledge and conform to the Business Code of Conduct. In this regard, the Company shall promote, encourage, develop, and educate all personnel for better understanding of the Business Code of Conduct. Moreover, superiors at all levels are required to take responsibility for ensuring that their subordinates strictly conform to the Business Code of Conduct.

If any personnel encounter difficulties in decision making or dealing with any matters which are not explicitly stated in the Business Code of Conduct, they shall first employ their own judgement before proceeding by asking the following questions:

- Does such an action or matter go against law, peace and order, and morality?
If the answer is "Yes", please stop the action.

- Does such an action or matter go against corporate value, established policies, or any other Company's regulations?
If the answer is "Yes", please stop the action.
- Does such an action or matter negatively affect the Company's good image?
If the answer is "Yes", please stop the action.
- Is such action or matter detrimental to the Company's stakeholders?
If the answer is "Yes", please stop the action.
- Is such an action or matter acceptable or socially disclosable?
If the answer is "No", please stop the action.

In the event of uncertainty or doubts whether the decision is correct or not, personnel should discuss with colleagues or seek advice from hierarchical supervisor, depending on the case.

In case there is problem that personnel cannot comply with the practices specified in the Business Code of Conduct, but it is a case that requires urgent action or if it is allowed to delay, it may cause deadlock or damages to the Company's business, personnel may proceed their work without conflicting with the questions regarding the actions above and promptly report to supervisor in order to resolve problem. Any actions taken by the Company personnel shall be deemed legally valid.

Penalties for non-compliance with the Business Code of Conduct

The Company shall not take any actions that are illegal or violate rules, regulations, and the Business Code of Conduct.

The Company personnel who violate the Business Code of Conduct or suggest or encourage others to disobey to the Business Code of Conduct, or neglect or fail to whistle-blow when coming across violation or non-conformance to the Business Code of Conduct shall be subject to investigation and punishment under the Company's regulations, which may include dismissal. Legal action shall be also taken if such action is considered illegal or violates rules and regulations prescribed by government agencies.

4. Business Code of Conduct

4.1 Compliance with Laws, Rules, Regulations and Respect of Culture and Customs

Symphony Communication Public Company Limited is the company listed on the Stock Exchange of Thailand (“SET”) and operates telecommunication network services business. The Company receives licenses to operate business from the government and is regulated by the relevant government and regulatory agencies. Moreover, the business of the Company is considered as provision of public services to general people. As a result, the Company gives the importance to the compliance with laws, regulations, principles, orders, announcements, and requirements stipulated by the relevant government and regulatory agencies as well as avoid taking any actions that are contrary to good culture and traditions.

Practical Guidelines

1. Respect and strictly comply with laws, rules, regulations, work process, orders, announcements, and requirements prescribed by the relevant government and regulatory agencies.
2. Be aware of and give importance to the compliance with laws and regulations by studying and understanding laws and regulations related to responsibility and region, and strictly comply with such laws and regulations.
3. Observe and understand the culture and customs of each region before taking any actions to ensure that operations do not conflict with customs and culture of that region.
4. Consult with related units and discuss with supervisors for a proper solution before taking any action in case it is found that the Company’s rules and orders differ from the regulations that are enforced in certain regions.
5. Do not assist or support any actions that avoid compliance or violate laws, regulations, or the Company’s orders.
6. Report action or incident of violation or non-compliance with laws, regulations, or the Company’s order to superior or through the channels provided by the Company. If any action or incident that may have a significant impact on the Company is found, superior must be immediately informed.
7. Follow up changes in new laws and regulations as well as constantly review and revise the working process to ensure an effective conformity to those laws and regulations.
8. Monitoring and ensuring compliance with laws, regulations, and work process is a duty and one of the main responsibilities of every supervisor at all levels.

4.2 Respect of Human Rights

The Company believes that all human beings have value and are equal in rights and dignity; therefore, the Company places the importance on respecting and protecting human rights which are the basic rights of human, strives to conduct business in accordance with human rights principles, as well as promotes acceptance of diversity and living together based on dissimilarity equally.

Practical Guidelines

1. The Company shall uphold and comply with relevant laws, policy, regulations, including international human rights principles and standards.
2. The Company shall conduct its business with care and diligence to ensure that business conduct does not violate human rights and shall avoid any actions that may lead to human rights violations, both directly and indirectly.
3. The Company shall respect rights and treat all stakeholders fairly and equally, without discrimination regardless of race, color, gender, gender identity, age, religion, language, belief, social status, family of origin, disability, political opinion, or any other status, and shall provide equal opportunities to all.
4. The Company shall promote fair employment and labor treatment applying zero tolerance of all forms of child labor, slavery labor, forced labor and illegal labor.
5. The Company shall not do anything that limits rights and freedom of expression and joining activities, as long as it does not violate any laws or moral rules.
6. The Company personnel shall treat their colleagues, customers, suppliers, and any others with honor and respect; shall not do anything that is immoral or appears to be threatening or bullying of others, whether physically or mentally, including sexual harassment, whether by words or any actions, that may cause distress, annoyance, embarrassment, loss of morale or may violate human dignity.
7. The Company personnel have a duty to monitor and must not ignore when witnessing any actions that violate human rights. The misconduct must be reported to the supervisor and investigation must get cooperation from the Company personnel.
8. The Company has intention to encourage suppliers, business partners, and other relevant parties in the supply chain of the Company to uphold and operate business based on human rights principles.

4.3 Treatment of Stakeholders

The Company takes into account roles of stakeholders and places the important on fair and equitable treatment of all stakeholders, firmly believing that good relationship with all groups of stakeholders is vital for sustainable development which will lead to long-term success. The Company, therefore, provides that its personnel must treat all groups of stakeholders honestly, equally and fairly taking into account their rights according to laws and agreements with the Company as well as not taking any actions that violate rights of stakeholders.

4.3.1 Treatment of Shareholders

1. Perform duties with integrity. Make decision on a foundation of transparency, due care and prudence taking into account the best interests of the Company and shareholders.
2. Manage the Company for stability and sustainable growth to ensure that shareholders will receive proper returns from efficient operation and operating results.
3. Regularly report on financial status, operating results, material information, and business outlooks of the Company to shareholders in an accurate, complete, timely manner.
4. Treat and ensure that all shareholders are protected their rights and treat equitably.
5. Strictly conform to resolutions of shareholders' meetings.
6. Do not seek benefits for oneself or for related parties by providing any information of the Company that has not yet been disclosed to the public and/or disclosing the Company's confidential information to outsiders and/or taking any action in a manner that may cause a conflict of interest with the Company.

4.3.2 Treatment of Employees

1. Provide fair employment conditions to ensure that its employees receive proper remunerations according to their knowledge, ability and performance and can be comparable to other companies in the same business.
2. Provides a process of selection, appointment, transfer, welfare, awards, termination of employment, and punishment of employees based on transparency, accountability, honesty, and fairness.
3. Treat all employees at all positions in all work units without discrimination regardless of origin, race, sex, color, age, religion, disability, status, family, educational institutes, or any other status that is not related to duties performance.
4. Promote the development of employees' potential, knowledge, skill and experience thoroughly and regularly to enhance their work efficiency.
5. Place an importance on maintaining working environment to be safe for health, life, and property.
6. Promote unity and trust among employees. The Company's personnel must treat each other with courtesy and respect of human dignity.
7. Encourage dialogue between the Company and employees or representatives of employees to present information to the Company's decision-makers so as to improve the quality of the workplace in view of joint development.

8. Provide opportunities, support and encourage all employees to show their abilities fully; respect rights of opinions expression of all employees without intervention; as well as provide the process of hearings and complaints filing in a proper and fair manner.
9. Encourage employees to exercise their rights in accordance with laws. The Company shall not do anything that obstructs employees' activities in the establishment, unless such activity is contrary to the laws, rules, policies and work regulations of the Company or causes damage to the Company.
10. Promote and organize activities that support employees to have balance in their lives, whether work, education, recreation, or family care.
11. Do not disclose information or private information without consent, which may harm the image of employees or corporate reputation, except where disclosure is mandatory by law.

4.3.3 Treatment of Customers

1. The Company is committed to delivering excellent services and quality standards at fair and appropriate price and continually improving service standards to forging satisfaction and confidence among customers as well as maintaining good relationship with customers.
2. Study and truly understand the demands of customers before presenting products or services to customers in order to correctly meet customers' demands. Constantly seek new information and knowledge and gain more work experience in order to be more effective in increasing customer satisfaction.
3. Strictly follow conditions or agreements with all customers with honesty as well as provide good, fast, timely, quality and standardized services as specified in the contract. In case conditions informed to customers cannot be met, customers must be informed to jointly find solutions and avoid damage.
4. Treat customers with courtesy, respect, equality, fairness without discrimination.
5. Provide accurate and complete information about services; not advertise or do anything deceptive to mislead customers about the quality of the Company's services.
6. Respect decisions and opinions of customers; be willing to receive customers' complaints and solve problems in a timely manner. In case of limitations or more time is needed to solve the problem, customers should be informed of the details or current status at an appropriate time and should be regularly updated on the progress to solve the problem.
7. Not violate personal rights of customers as well as not disclose customers' information, whether received from providing services or from conducting business, unless consent is obtained from customer or information is disclosed in accordance with the law or necessary to correct or prevent damage that has occurred or may occur to the Company, as the case may be.
8. Provides communication channels for customers to contact the company in case they have inquiries about services or complain about problems in using the service. In this

regard, such channels must be convenient for customers to contact and have an appropriate data storage system.

4.3.4 Treatment of Suppliers

1. Conduct procurement with fairness, transparency, free from corruption and in accordance with the rules and regulations stipulated by the Company and relevant government agencies.
2. Set out clear and transparent criteria and procedures for selecting suppliers. The contract is prepared in an appropriate and internationally accepted form.
3. Treat all suppliers equitably and equally, without prejudice and discrimination. Provide accurate and same information and conditions to all suppliers as well as treat suppliers with courtesy.
4. Strictly follow promises or agreements with suppliers. In case conditions informed to suppliers cannot be met, suppliers must be informed in advance to jointly find a solution and avoid damage.
5. Do not engage in the procurement process with suppliers who have close relationships, such as family members, siblings, close relatives, etc.
6. Do not solicit, accept or offer any illegal benefits to any suppliers; Remain neutral and refrain from close association with any suppliers that might influence decision-making.
7. Maintain confidentiality of suppliers and do not use suppliers' confidential information for personal interest and/or interest of related parties unless consent is obtained from suppliers.
8. Promote and support business operation with suppliers who conduct business with fairness and honesty without violation of human rights and have awareness of social and environmental responsibility.
9. Support engagement and communication with suppliers to ensure that suppliers are aware of the Company's principles, policies and practices for conducting business, e.g., Supplier Code of Conduct, Anti-Corruption Policy, etc.
10. Strive to maintain long-term relationships with suppliers and create cooperation in the development of economic, social, and environmental sustainability.

4.3.5 Treatment of Business Partners

1. Respect the rights and maintain relationships on the basis of mutual trust, and not taking advantage of business partners by any means.
2. Strictly follow agreement and commitment to business partners.
3. Provide business assistance in a manner that facilitates mutual benefits for overall business results while taking into account the best interests of the Company and based on the fair returns to both parties.
4. Provide true information and an accurate report. Any negotiations must be executed based on business relationships.

5. Cooperate, share opinions and recommendations, and solve problem collaboratively with business partners, by harnessing the strengths and resources of each respective party for synergy to attain investment objectives and mutual optimal benefits
6. Strive to maintain long-term relationships with business partners as well as create cooperation in the development of economic, social and environmental sustainability.

4.3.6 Treatment of Creditors

1. Strictly follow conditions or agreements to creditors. Service debt in full, accurately and on schedule. In case conditions informed to creditors cannot be met, creditors must be informed in advance to jointly find solutions and avoid damage.
2. Manage finance and risk appropriately and transparently for building creditors' confidence.
3. Manage loans to meet the objectives; abstain from using the loan in a way that may cause damage to the Company.
4. Disclose information about operating results and financial information to creditors in a complete, correct, and timely manner.

4.3.7 Treatment of Trade Competitors

1. Conduct business on free competition. Consider and act within the framework of fair competition, not seek' trade secrets or inside information of trade competitors by illegal means, such as theft, espionage or violation of agreement, not disclose competitors' information, whether received from customers or other persons. In addition, the Company personnel shall not damage competitors' reputation by allegations or slander and shall not enter into agreements with competitors or other persons which reduce or limit business competition.
2. Promote beneficial cooperation with trade competitors for the benefits of customers. Cooperation between the Company and trade competitors must not be in the form of monopoly, trade cartels, decreasing the quality standards of products and services, or price fixing which will cause harm to consumers.
3. The Company personnel must study and comply with both local and universal laws governing trade competition and must not take any action that causes unfair competition, such as bid rigging, trade monopoly, setting unfair prices, etc. The Company personnel must also be careful in dealing with trade competitors and trade competitors' personnel in any cases and must not reveal the Company's confidential information to trade competitors or let the Company's confidential information falls into competitors' hand.

4.3.8 Treatment of Government and Regulatory Agencies

1. Strictly comply with laws, policies, notifications, orders, and requirements prescribed by government and regulatory agencies.
2. Disclose necessary information accurately, completely, and straightforwardly to regulatory agencies concerned.
3. Support the operation of the government and regulatory agencies.

4. Promote and support cooperation in the activities of government agencies in order to create stability and growth for community and society.

4.3.9 Treatment of Communities, Society and Environment

1. Strive to conduct business on the foundation of ethical standards and responsibility for communities, society and environment.
2. Strive to participate in the development of community and society, both economic, social and environmental dimension.
3. Strive to operate business by preventing and controlling environmental impacts along with managing environment efficiently in all aspects ranging from air quality management, waste and e-waste management to minimize negative impact to environment.
4. Foster awareness of community, social and environmental responsibility to its personnel at all levels continuously as well as encourages them to have voluntary mind and responsibility towards community, society and environment without expecting anything in return.
5. Spend a portion of its profit to support social and environmental activities that truly benefit community, society and environment under the following directions:
 - It is an activity that is in line with the Company's business direction.
 - It is an activity that can be implemented continuously and concretely.
 - It is an activity that truly benefits society, communities, and the environment in the long run.
 - It is an activity that promotes morality and ethics and preserves arts, culture, traditions and local wisdom.
 - It is an activity that promotes development of education and continuous learning.
6. Promote employment and skill development of local people, including conservation of art and culture of community where the Company operates business.
7. Support the networking of the people sector as well as monitors and participates in social activities, exchange and transfer of technology, as well as alleviation of hardship caused by natural disasters.

4.4 Vested Interest and Conflict of Interest

The Company is committed to conducting business taking into account the optimal benefit of the Company and of stakeholders as a whole. Therefore, good practices have been established to demonstrate the intention of the Company to operate business with integrity, transparency and auditability, and adhered to as duty of all personnel including those who are involved with the Company to avoid having vested interest or engaging in any actions that may cause conflict of interest with the Company.

Practical Guidelines

1. The Company has put in place a clear and transparent shareholding structure without cross-shareholding among major shareholders to prevent conflict of interests with any parties. The shareholding structure shall be disclosed in the Company's annual registration statement/annual report (Form 56-1 One Report).
2. The Company personnel must avoid or refrain from any actions that may lead to potential conflict of interest between oneself and the Company; and must not act in any manners that pose burdens to the Company and engage in potential conflicts of interest with the Company or seek benefits for oneself and/or related person, whether directly or indirectly, unless such interest is disclosed in writing in accordance with rules and regulations established by the Company before entering into the transaction and is specifically authorized or approved to do so.
3. The Company personnel shall not engage in any business in competition with the business of the Company including not being a partner, shareholder with management authority, director, or executive of other company which undertakes business in the same nature the business of the Company.
4. The Company personnel shall not use or allow others to use their position, whether directly or indirectly, and shall not exploit confidential information of the Company for personal gain or gain of related persons.
5. The Company does not have a policy to nominate members of its management team or employees to hold directorship in other companies or profit organizations, except for its subsidiary or associated companies. In the event where any executives or employees will become a board member in other companies and/or in other profit/non-profit organizations, the approval from the president or the Executive Committee must be received.
6. The execution of any private business or activities of the Company personnel must not affect performance and working hours. The Company's resources and location must not be used for personal benefit.
7. The Company personnel must not be involved in an approval of transaction in which they may have conflict of interest. In case it is necessary to get involved, the superior must be reported immediately for assignment to other to perform duties.
8. In attending a meeting to consider any agenda item in which personnel have vested interested, personnel having a vested interest shall abstain from being present on such

agenda item so that other attendees can consider, analyze, and provide opinions without influence of such personnel.

9. Each director, senior executive, and executive according to the definition of the Securities and Exchange Commission shall have duty to prepare a report on his/her interest and interest of his/her related person by disclosing information about directorship or executives position in other companies or juristic persons, both of their own and their related persons, and file with the company secretary within 30 days from the date of taking position as director or executive of the Company, and report every time when there is a change in the information so that the Board of Directors has accurate information for considering and approving the transactions of the Company and its subsidiaries.
10. The hiring of new employees who are related to the Company personnel must be transparent and fair to those with the same qualifications. The Company personnel must not interfere or use influence in assisting persons related to them to get employment.
11. The Company personnel shall be careful and must not let personal relationships with other parties or agencies harm the Company's best interests.

4.5 Prevention of Fraud and Corruption

The Company is committed to conducting business with integrity, transparency, compliance with laws, regulations and good corporate governance principles, and fair treatment to all groups of stakeholders. The Company shall not tolerate fraud and corruption in any forms and prescribe that its personnel must strictly adhere to policies, guidelines, and measures about prevention of fraud and corruption set by the Company.

Practical Guidelines

1. The Company shall not tolerate any forms of fraud or corruption and shall strictly comply with laws governing anti-fraud and corruption.
2. The Company personnel must not commit, engage in, or support any action that involves fraud and corruption, whether directly or indirectly.
3. The Company personnel must study, understand, and strictly comply with laws governing anti-fraud and corruption, including policies, guidelines, regulations, and the Business Code of Conduct of the Company.
4. Corruption risk assessment and internal control must be regularly maintained to ensure effectiveness and suitability for fraud and corruption prevention. Risks in corruption-prone operations must be reviewed and assessed at least once per year.
5. The Company provides communication channels for its personnel and stakeholders to file clues, suggestions, or complaints related to fraud and corruption as well as sets out measures for protection of whistleblowers.
6. The Company personnel must not neglect or overlook any incident that may involve fraud or corruption and shall report such incident to supervisors or person in charge including providing cooperation in the investigation process.
7. The Company strives to create and maintain its corporate culture on zero-tolerance on corruption as well as to campaign and cultivate awareness and culture of operating business with integrity, respect of laws, and adherence to ethical principles by provide continuous communication and training its personnel to foster a clear understanding of prevention of fraud and corruption.

4.6 Giving and Receiving Gifts or Other Benefits, Hospitality and Entertainment

The Company adheres to the principle of conducting its business with transparency and in accordance with good corporate governance principles. The custom of giving and receiving gifts or other benefits, hospitality and entertainment to express kindness, gratitude or care or to build and maintain good relationships with customers, suppliers, and stakeholders is acceptable. However, there must be precautions to ensure that these gestures of goodwill are sincere and without the intention to influence or appear to influence decisions on business or duties performance.

Practical Guidelines

1. The Company personnel are allowed to give or accept gifts or other benefits, hospitality and entertainment in a reasonable manner on customary occasions. However, giving and accepting must not contravene relevant laws and local customs. Moreover, gifts or other benefits to be given should be at an appropriate price, not in the form of cash or cash-equivalents (such as gift voucher), not against moral principles, not illegal, and should be in the form that enhances the Company's image.
2. Expenses for business hospitality, entertainment and other expenses that are directly related to the fulfillment of a business contract are acceptable, but it must be paid in a reasonable manner with no influence on business decision and without causing conflicts of interest.
3. Giving and receiving gifts or other benefits, hospitality and entertainment must be made in the name of the Company with righteous, transparent and open manner and in accordance with the established regulations of the Company and of government agencies, state enterprises and other relevant agencies.
4. Giving and receiving gifts or other benefits, hospitality and entertainment should be based on a single standard to avoid discrimination.
5. The Company personnel, their family members, and persons with close relationship with them are prohibited from soliciting or accepting gifts or other benefits, hospitality, entertainment or travelling expenses from customers, suppliers or any parties involved with the Company's business, whether directly or indirectly, that may lead to unfair judgments, impairment of decision-making, or conflicts of interest.
6. The Company personnel, their family members, and persons with close relationship with them are prohibited from offering gifts or other benefits as well as hospitality, entertainment to government officials, customers, suppliers, including spouse, children, and/or any persons related to government officials, customers, or suppliers, where it being considered receiving via an intermediary, even if it is made personally, unless giving is made within customary occasions and with no violation of laws.
7. Acceptance of an invitation to a meeting, training, seminar, or a visit to a business operation at the expense of a supplier is allowed if such a meeting, training, seminar, or

visit is part of an agreement earlier made. However, there must be no hidden agenda for leisure travel.

8. Invitation to a meeting, training, seminar, and a visit to a business operation at the expense of a supplier which is not part of an agreement can also be accepted provided that the acceptance is considered appropriate and beneficial to the business of the Company. The acceptance, however, is subject to prior approval under the regulations of the Company.
9. Support for travel expenses or other expenses to government officials can be offered as considered appropriate. However, such support must conform to the regulations of the Company.
10. The Company prohibits its personnel, their family members and/or persons with a close relationship with them from giving or receiving gifts or other benefits, hospitality or entertainment during business negotiations or signing period.
11. In the event where gift or other benefits, hospitality or entertainment are not in an appropriate form, The Company personnel must reject or return it to the giver. If the refuse or return is not appropriate or cannot be made, The Company personnel must report their superiors and persons in charge and must submit gifts to the Human Resource Division for further execution as deemed appropriate.
12. In case where The Company personnel have doubt or questions about giving and receiving gifts or other benefits, hospitality and entertainment, they shall ask or get advice from superiors or persons in charge.

4.7 Charitable Contributions and Sponsorship

The Company has a clear policy, criteria and regulations on charitable contribution and sponsorship. Charitable contributions and sponsorship must be made under the Company name with transparency and in accordance with policy, criteria and regulations of the Company as well as laws. This is to ensure that charitable contribution and sponsorship are used for the benefit of the public or meet the purpose of the contribution, not for any dishonest purposes.

Practical Guidelines

1. Charitable contributions and sponsorship must be granted to well-recognized or legally registered entities only.
2. Charitable contributions and sponsorship must be made in the name of Company with transparency through the procedures set forth by the Company's policies, guidelines, and regulations and in compliance with applicable laws. A process of following up, approving, reviewing and inspecting shall be put in place to ensure that effort is used for public benefit and/or truly meets the purpose of contribution.
3. A certificate of appreciation, receipt or other clear documentation is required to serve as evidence to ensure that charitable contribution is not a pretext for fraud and corruption.
4. Providing sponsorship to any entities or activities must be for the purpose of promoting business and/or a good reputation and image of the Company and must clearly specify the Company's name and/or logo. It must also be arranged in a transparent manner, complying with procedures and regulations prescribed by the Company and laws.
5. The Company clearly defines authority for approval of charitable contributions and sponsorship in terms of amount and hierarchy of approval. Evidence of approval must be kept and recorded by the Accounting Department and must be audited by both internal and external auditors to ensure that charitable contributions and sponsorship are made in a good faith and transparent manner.

4.8 Political Neutrality

The Company is a politically neutral organization, having no policy to help, support, participate or act in a manner that inclines to any political parties, political united fronts, politicians, persons with political power, political candidates, or person relating to politics whether directly or indirectly, at a local, regional, national, international or global level. Nevertheless, the Company supports any actions that are aligned with the regime of that country, including respecting rights and freedom of its personnel to exercise their political rights and participate in political activities as a good citizen according to the Constitutional Law and the Democratic Form of Government with the King as Head of the State.

Practical Guidelines

1. The Company realizes the importance of political impartiality and shall not get involved with or inclined to any specific political parties, political united fronts, politicians or persons with political power.
2. The Company has no policy to use the Company's capital, assets, personnel, or resources to support any political purposes and assist political parties and politicians, whether directly or indirectly, to benefit politicians or political parties or to benefit the Company or facilitate the Company's business operation.
3. The Company shall not participate in campaigning or make any advertisements to any political parties or any politicians within the Company's premises, including not allowing any political parties or any politicians to use resources and location of the Company for political activities.
4. The Company encourages its personnel to comply with laws and exercise their rights to participate in any political activities on their behalf under the conditions that such actions does not affect working hours and duties performance as personnel of the Company. In addition, The Company personnel must not express, by any means, that makes others misunderstand that the Company is involved with or supports political party or politician.
5. The Company personnel must not use the Company's assets or services to support or achieve any political purposes or not take any action, by any means, that cause the Company to lose its political impartiality.
6. The Company personnel must not use their authority or position to persuade, command, or force, by any means, colleagues or subordinates to support or participate in political activities, whether directly or indirectly.

4.9 Maintaining Confidential Information

Confidential information includes business plans, trade and business secrets, operating results, information of customers, suppliers, business partners and trade or business agreements, financial information, any information that may affect corporate image and corporate value, information that are legally required to be kept confidential, employees' personal data, security passwords, and/or any other information that, if disclosed, may result in damage or discredit to the Company, including its personnel, customers, suppliers or business partners.

Information is a valuable asset for the business operation of the Company. It contributes to efficient decision-making and strengthens competitiveness. Therefore, the Company places the importance on safeguarding information that may affect business operations of the Company from leakage as well as provides efficient data storage system to prevent risk from data loss and damage.

Practical Guidelines

1. Establish policy, criteria, and procedures regarding the retention and destruction of the Company's confidential information, including determining the levels of confidentiality to prevent confidential information from being abused or illegally exploited.
2. The Company personnel must study and understand the levels of confidentiality and applicable procedures for maintaining and destroying confidential information according to its level of confidentiality.
3. The Company personnel must maintain material business information as well as confidential information of the Company and all stakeholders with utmost seriousness and within a limited circle without informing, revealing or forwarding it to unauthorized insiders or outsiders even after retirement, resignation, or termination of employment with the Company, unless it is required by law, court order, or resolutions of the Board of Directors.
4. Do not use confidential information that know from position for own interest or for interest of others.
5. The Company personnel who know or possess the Company's confidential information must not make a copy of such information in any form.
6. Set a password for access to confidential information, including for electronic devices that store confidential information. A separate password must be provided when sending confidential documents electronically.
7. Outsiders with the opportunity to handle or have access to confidential information must sign a Non-Disclosure Agreement to ensure that they are careful to keep the confidentiality and inside information.

4.10 Safeguarding and Utilization of Company Assets

The Company provides tools, appliances, equipment and necessary assets to facilitate duties performance of its personnel. Therefore, the Company personnel must utilize such assets in a correct way with full efficiency and value as well as protect them from damage and loss or from exploiting for personal interest or interest of others.

Practical Guidelines

1. The Company personnel shall have duty and responsibility for taking care and maintain the Company's assets, keeping them in good condition and protect them from damage or loss, like a person safeguard his own assets, not exploiting the Company's assets for personal interest or interest of others, or using them in illegal way.
2. The Company personnel must utilize the Company's assets in performing duties with highest efficiency for maximum benefit of the Company, while taking into account environmental protection and energy conservation.
3. In the case where the assets under possession or responsibility of personnel are damaged or lost, such person must take joint responsibility with the company as stipulated by the Company's rules, regulations, and policies.
4. When terminating position or employment with the Company, the Company personnel must return all assets used for work, including information, results of work, and inventions to the Company in any form they are kept. Moreover, the Company's personnel must not record, copy, or photocopy the information for dissemination or for personal gains without the Company's consent.

4.11 Use of Information Technology System

An information technology system or IT system is a precious asset of the Company. Therefore, it is necessary to be governed systematically and efficiently. The Company has a policy for its personnel to use IT system efficiently and in compliance with applicable laws under adequate safety standards for the interest and effectiveness of the Company's business.

Practical Guidelines

1. The Company integrates IT systems into every work process along with developing its personnel to be technologically knowledgeable.
2. The use of the IT system of the Company must be for the purpose of business. The IT system is considered the Company's asset, so users cannot expect privacy and must avoid using it outside business operation.
3. Information owners must be responsible and ensure that information recorded in and disseminated through the IT system does not violate laws or infringe upon third parties.
4. The Company uses computer software which is properly licensed and have generally accepted technological standards.
5. The Company personnel must use licensed computer software. If it is necessary to install additional computer software for work, the installation must be approved and comply with the Company's regulations.
6. The Company personnel must not use the Internet in a way that may cause damage to the Company's computer system and the Internet system, including not using the Internet, computer system, or any materials to search, disseminate, or keep information which are inappropriate and contrary to morality, laws, rules, regulations, and relevant policies.
7. The Company personnel must keep the password to access the computer system and computer software confidential to prevent important information of the Company from outside excess and theft.
8. The Company personnel must strictly adhere to the information security policy and information security standards set by the Company, including law, rules, regulations, and relevant policies.
9. The Company personnel facing an emergency case that may affect business operation and stability of the IT system or encounter vulnerability of the system, whether technical or operational, or anything that may cause risk to the Company must promptly inform the responsible department.
10. The Company personnel must provide cooperation in monitoring, controlling, or any actions to ensure the security of the IT system.
11. In the event where temporary employees, interns, suppliers, business partners, contractors, advisers, customers, or any third parties are allowed to use the Company's information technology system, the use of the information technology system by such persons must be closely monitored by the head to relevant division to ensure that it complies with rules, regulations, and policies set by the Company.

-
12. The Information Technology Division has duties to establish regulations and measures for use and control of IT system, for instance, use of email, use and installation of computer software, information accessibility, as well as monitor to ensure that The Company personnel strictly adhere to the established regulations and that the use of IT system are efficient and generates maximum benefits to the Company. The duties also include the provision of security safeguarding system of accessing confidential or important information of the Company from irrelevant employees or external parties and from computer virus attack, and the provision of data backup and data recovery system in accordance with the provisions of relevant laws.

4.12 Respect of Intellectual Property

Intellectual properties are considered as one of the most valuable assets of the Company as well as are vital in maintaining the competitive advantage of its business operations. Therefore, it is important that the Company must protect such assets from violation or abuse, while respecting and not infringing on the intellectual properties of others.

Practical Guidelines

1. The Company conducts business and encourages its personnel to perform duties in compliance with laws or regulations governing intellectual property, whether trademark, copyright, patent, trade secret, and other intellectual properties governed by laws.
2. The Company personnel are prohibited from using the Company's intellectual property for personal gain or disclosing it to public without permission, whether exploiting, duplicating, or modifying. Disclosure of the Company's copyrighted information to the public, whether in a whole or some parts, must receive permission from the Company first.
3. The Company encourages its personnel to realize the importance of respecting intellectual property rights, both at work and in daily life, use products and services with genuine and legitimate copyright or patent or trademark and not support products or deed that infringe on intellectual property rights.
4. The Company encourages and supports its personnel to freely create work. The Company personnel can conduct research, study, write and publish articles for various publications, as well as develop computer programs and presentations via computer programs for dissemination of information, expression of idea, and education. Any returns from such work, as well as associated legal rights would belong to the creator. However, the Company shall hold the legal rights and returns from any work commissioned by the Company and/or based on the Company's information or knowledge within the Company.
5. Intellectual properties, such as reports, statistics, blueprints, trade information, computer programs, of the Company under the possession must be fully returned when the Company personnel terminate their position or employment with the Company.

4.13 Trade Competition

The Company is committed to conducting business in compliance with antitrust law, trade competition law, and relevant notifications of the Trade Competition Commission's announcements as well as supporting free and fair-trade competition, including not committing any behavior that is an unfair trade practice or that may cause competition restrictions.

Practical Guidelines

1. The Company shall study and make an understanding of the laws governing trade competition before taking any action.
2. The Company shall study and examine the laws relating to monopoly before proceeding to acquire and merge business or other related transactions that may reduce or significantly limit free competition in the market.
3. The Company personnel are prohibited from forming an agreement with characteristics that may reduce or limit trade competition or cause unfair competition with competitors or any person. Such characteristics include pricing, fraudulent bidding, marketing allocation, and agreements to restrict procurement.
4. The Company personnel must be careful when meeting or contacting trade competitors or must not participate in any agreement that may constitute an anti-competitive conspiracy.
5. The Company personnel are prohibited from exchanging sensitive information that may affect commercial competition with external parties.

4.14 Market Communication

Market communication is an important part in fostering value and a good image of the Company toward society. Market communication must be conducted in a truthful manner with complete and without distorting information as well as with due regard for fairness to all related parties and stakeholders.

Practical Guidelines

1. Marketing communications must be based on facts with due regard for fairness to related parties and all stakeholders
2. Refrain from giving information that is incomplete and incorrect or distorts facts as well as from undertaking advertising campaigns that are not truthful, or which may lead to misunderstanding.
3. Refrain from using images or content that may create bad attitude, social cleavage or inappropriate values, especially sexual and moral, for promotional activities.
4. Refrain from giving out information or news that is distorted, false, against good culture and morality, or false accusations about trade competitors, either directly or indirectly, to the press and media.

4.15 Prevention of Money Laundering

The Company is fully committed to protecting itself from being used as an intermediary in the money laundering process and funding illegal business practices, both of which can seriously damage the Company and its reputation.

Practical Guidelines

1. The Company is committed to complying with the laws governing prevention and suppression of money laundering and is firmly opposed to all forms of money laundering to prevent itself from being used as a tool or channel for transferring, concealing, or disguising source of proceeds or assets from illicit activities.
2. The Company is committed to engaging in business with trustworthy customers, suppliers and business partners which conduct their business by law and be careful in engaging in transactions with individuals or juristic persons suspected of illegal acts.
3. The Company personnel are required to carefully select and award suppliers and business partners by thoroughly their profiles and records in order to ensure that they engage in legitimate business activities and do not conduct any activities which may be suspicious of money laundering or support money laundering.
4. Employees must immediately notify supervisors of any abnormality of customers or suppliers' payment methods and behavior that implies dishonesty, for example, payment in currency other than that specified in invoice or contract, payment to or from other countries without clear origin, payment in cash or cash equivalent, payment to persons who is not related to the transaction, payment to or from account other than that of suppliers or customer's account, use of multiple checks without good reason, etc.
5. The Company personnel shall be willing to unconditionally cooperate with relevant agencies to prevent money laundering as well as strictly comply with the laws on the prevention and suppression of money laundering.

Symphony Communication Public Company Limited

Business Code of Conduct

ACKNOWLEDGEMENT AND CONFORMITY FORM

I received the Business Code of Conduct Handbook of **Symphony Communication Public Company Limited**. I studied, acknowledged, accepted, and shall strictly comply with, including adopting it as a guideline for performing duties.

I understand that violation of or non-compliance with the Company's Business Code of Conduct is subject to disciplinary measures or prosecution by law.

Signature:
(.....)
Employee ID:
Section:
Department:
Division:
Date: / /

If you require any further clarification and/or information regarding the contents of the Business Code of Conduct, please contact the Human Resource Division or the Company Secretary Department at Tel: 0 2101 1111 ext. 36010.