

# **BUSINESS ETHICS**

**Of**

***SAMART***

**Samart Corporation Public Co., Ltd.**

(The Updated Version has been approved by the Board of Directors of the Company on February 26, 2026)

## Table of Contents

Messages from the Chairman	1
Business Code of Conduct	2
Corruption Prevention Policy	3
Employee policies	8
Employee life and health safety policies	8
Customer policies	9
Trade partners policies	9
Creditor policies	10
Counterpart / Competitor policies	11
Money Laundering policy	11
Tax policy	11
Sustainable Development policy	11
Human rights policies	13
Operating policy on non-infringement of intellectual property or copyright	15
Conflicts of Interest	15
Responsibilities to shareholder	16

### **Messages from the Chairman**

Samart Corporation is conducting the business with great awareness in ethical and moral issues. The Company distributed handbooks concerning business ethics for all members of the Board of Directors, managerial team and our employees of the Company and subsidiaries since 2005 and have been revised continuously. The handbook serves as a guideline for everyone to continue his/her duty with honesty, integrity, morality, and, of course, highest quality. It also reminds the Company to bring fair treatment in accordance with legal restrictions, to maximize shareholder value, and to prevent plausible conflicts of interest. Samart Corporation strongly believes that the propensity to apply ethical practices to the organization will certainly enhance growth within the Company and acceleration of societal progress and country's economy.

- Signature -

(Mr. Seri Suksathaporn)  
Chairman

## **Business Code of Conduct**

Vision : “Ssmart Group” A leader in providing high quality technological solutions of international standards, creatively responding to service users’ needs while upgrading the quality of life, society and the environment in promoting the country’s sustainable development.

Ssmart Corporation Public Company Limited and its subsidiaries adhere to the code of conduct. Directors, managements, and employees must abide by the code of conduct as follows:

1. Perform duties in accordance with the related laws, regulations, and policies related with the Company.
2. Perform duties with professionalism, honesty, integrity, prudence, and express independent opinions with the facts.
3. Dedicate time to perform duties with the utmost determination and ability.
4. Treat colleague, superior, subordinates, customers, shareholders, and related persons with humility, honor, respect for rights, and being a good example.
5. Keep business information confidential at all times even after leaving the status of being an employee of the Company or related companies.
6. The Company is politically neutral and does not act in a way that is biased or supportive in financial or other forms to political parties, political coalition groups and people with direct and indirect political power. However, the Company respects the political rights of its personnel as good citizens according to the constitution, for example, exercising the right to participate in expressing legitimate political opinions or voting in elections, exercise of personal political freedom that does not affect one's image or cause damage to the Company, etc.
7. Do not act or be involved in receiving or give property or any other dishonest benefits.
8. Donations to help and charity or public must be for public charitable purposes only and must include supporting documents.
9. The Company discloses information based on facts, adhering to the principles of fairness, transparency, and accountability.

## **Corruption Prevention Policy**

Samart Corporation Public Company Limited and its subsidiaries operate business in accordance with the corporate values, business code of conduct and the principles of good corporate governance, including compliance with laws related to the prevention of corruption and all forms of direct and indirect corruption. To ensure that Samart Corporation Public Company Limited and its subsidiaries have a policy to define the responsibilities, practices and requirements for appropriate operations to prevent corruption. Therefore, a written corruption prevention policy has been established for the directors, managements, employees and all relevant stakeholders to seriously comply with the corruption prevention policy.

### **Definition**

**Fraud** means committing an act in order to procure, for himself/ herself or another person, any advantage to which he/she is not entitled by law, which includes the following actions;

1. Asset Misappropriation means possessing property belonging to another person, or of which the other person is a co-owner, and dishonestly converting such property for himself/herself or a third person.
2. Embezzlement means the act of deceiving a person with the assertion of a falsehood or the concealment of facts which should be revealed with honestly causing such deception obtain property or the person who has been deceived or a third person to execute, revoke, or destroy any document of right.
3. Corruption means demanding, accepting, or agreeing to accept, offering, requesting, or promising to give property or other benefits to government officials, government agencies, private sector officials, private agencies, to allow individuals or agencies to use their existing powers to act or not act, to hasten or delay an action that is inappropriate for their duties. These cause the acquisition of improper benefits, whether for oneself or others, or the maintenance of improper business or benefits.

**Property** means money, things, gifts, or other benefits that may be calculated in monetary terms, including the granting of special rights that are not reserved for the general public in the matter of receiving discounts on goods, receiving services or entertainment, and paying for travel or tourism, accommodation, food, providing employment, or anything of a similar nature, whether given in the form of cards, tickets, or other evidence, advance payment, or refund later.

**The Company** means Samart Corporation Public Company Limited and its subsidiaries

**Personnel** means directors, managements, employees and stakeholders of Samart Corporation Public Company Limited and its subsidiaries.

## **Duties and Responsibilities**

### **1. The Board of Directors**

- 1.1 Consider and approve the Corruption Prevention Policy
- 1.2 Supervise to ensure that there was an effective corruption prevention support system.
- 1.3 Promote and support an organizational culture of operating with honesty.

### **2. The Managements**

- 2.1 Set the rules and measures for employees, including disciplinary punishments.
- 2.2 Arrange the working system that promotes and supports the prevention of corruption. As well as, review the appropriateness of the system and various measures.
- 2.3 Support and communicate this policy to the employees and concerned persons from all departments for understanding.
- 2.4 Provide channels for whistleblowing, also the measures to protect the whistleblower.
- 2.5 Report the operating results to the responsible committees.
- 2.6 Review / improve the various concerned policies about the corruption prevention.

### **3. The Compliance**

Review, monitor and consider the compliance with the corruption prevention policy, annually and report the operating results to the Board of Directors, regularly.

### **4. The Employees**

Understand and follow the corruption prevention policy which must not be involved in the corruption, both directly and indirectly.

## **Guidelines for practice**

1. The procurement must be conducted in accordance with the criteria or procedures specified in the regulations, which must be fair and transparent in the operation, taking into account the reasonable price, quality, and after-sales service, as well as taking into account the standards that the seller of the goods or services should have. In addition, the staffs must not engage in business that may lead to personal benefits by relying on their position in procurement, whether directly or indirectly, also must not use the information obtained from the procurement to seek personal benefits or others.
2. The Company has no policy of paying facilitation fees in any case, both directly or indirectly. It will not engage in fraud and will not accept any action in exchange for facilitating business operations.
3. The Company has the policy to conduct business with political impartially and compliance with the laws as well as democratic form of government with the King as Head of State. The directors, the executives, and employees shall have political rights and liberty pursuant to the law, however, they shall not perform any act which can make the Company lose impartiality or damage from involvement in the political activities as well as usage of any resources of the Company for such act.

4. The Company supports for community and social development for better quality of life including enhancement of economy of the community and society through business processes or donation for charity of which the proceed shall be used for public charity only as well as supports for the Company's business with clear evidences and in line with the Company's regulations.
5. Receiving or giving any benefits as tradition and morality to express gratitude or maintaining business relation as usual should be done with appropriateness. The Company will not encourage or expect the receiving person to ignore his/her duty and/or return favor from giving inappropriate present, property or other benefits with the following practices:
  - 1) Receiving and giving property or other benefits that could improperly influence decision making:
    - The employee of Company shall not receive or give money, property, merchandise or any benefits involving anyone whose intention is to persuade the employee to commit or omit anything contrary to duty.
    - Receiving present or property shall be compliance with morals, and shall not be illegal as well as such gift or property shall not be illegal.
    - Paying for business expenses such as meals and other forms of hospitality that are directly connected to performance of business commitments is acceptable, but such expenses must be reasonable.
    - Giving present, property or other benefits to government officer in Thailand and other countries must be sure that it shall not against the law and local tradition.
  - 2) Receiving or giving present and the memento:
    - Receiving or giving present or memento, should make sure that such an action does not violate the law, and the Company's rules and regulations.
    - Avoid receiving or giving present or memento that could unfairly influence a decision in the performance of one's duties. If it is necessary to receive a gift of unusually high value from someone doing business with the Company, report the matter to the superior.
    - Keep records of expenses as evidence of the value of present or memento given, so that can be examined later.
    - If the employee has been assigned or permitted by the superior to assist an outside agency, the employee may receive money, item, or present according to the guidelines or standards that agency has set.
  - 3) Transactions with the government sector:
    - Conduct properly and honestly when in contact with government officials or agencies.
    - Always remember that the laws, rules, and customs of each place may have diverse conditions, procedures, or methods of proceeding.
    - Comply with the laws of each country or locality in matters pertaining to hiring government employees as consultants or employees of the Company. Such hiring must be transparent and appropriate.

6. The Company has the risk assessment and risk management by Internal Audit Department to audit operations which may tend to have risks of all departments of each company, including the risks from corruption to ensure that all departments have appropriate internal control system in place, both on preventive control and detective control. If it is found that any department does not have adequate internal control system or there is a corruption case, such matter shall be reported to the Audit Committee and the high level executives. Preventive guidelines must have also been reported in order to improve the internal control system.
7. The Company considers employees' remuneration fairly to ensure the remuneration provided to the employees is adequate, focused on creation of consciousness and it must not be the source for corruption. The Human Resource Department shall compile the survey results report on wage adjustment in each year from the well-known institutes, both domestically and internationally as well as exchange information with the Human Resource Department of other companies in the telecommunication and computer businesses. The information gained shall be used for consideration on provision of remuneration to the employees.
8. The personnel must strictly comply with the Company's Corruption Prevention Policy.
9. The personnel must not ignore any acts when encountering to the act that may be caused corruption by informing to the Managements or responsible person and cooperate in the investigation of the facts.
10. The personnel must avoid any act that may lead to the conflict of interest. If any act or behavior occurs that may lead to the conflict of interest with the Company, such personnel are required to report such conflict of interest through the specified channels.

#### **Publication of the Corruption Prevention Policy**

In order to be aware of the corruption prevention policy of the personnel, the Company will take the following actions as below;

1. Announce the Corruption Prevention Policy in an observable place for everyone in the organization's acknowledgement.
2. Publish the Corruption Prevention Policy through various channels of the Company, such as, the intranet system, the Company's website, and the Annual Registration Statement / Annual Report (Form 56-1 One Report), etc.
3. The Corruption Prevention Policy has reviewed annually or when there are significant changes.

#### **Training**

Provide orientation, training, meetings or various activities that are appropriate regarding the Corruption Prevention Policy and related knowledge for the Company's Directors, managements, employees and stakeholders, continuously.

### **Whistleblowing or Complaints**

The Company adheres to good corporate governance principles and encourages the staffs and the stakeholders to examine and oversee any action which is illegal fraud or any action which might cause damages to the Company. As well as violating the rules, regulations, and code of conduct or violating this policy both directly and indirectly. The employees and stakeholders can notify the clue on misconduct behavior to the Company by sending information and/or document and/or concerned evidence to the Internal Audit Department. If the name and surname of the informant is specified, it will be more beneficial to the Company for convenience on enquiry and/or contact for more information. Those channels consist of direct mail or E- mail as informed at the Company' s website ([www.samartcorp.com](http://www.samartcorp.com)) under "Contact Us" with the following details:

Mailing Address : **Head of Internal Audit Department**

Samart Corporation Public Company Limited  
99/1 Moo 4, Software Park Building, 35<sup>th</sup> floor, Chaengwattana Road,  
Klong Gluar, Pak-kred, Nonthaburi 11120

or E-mail address : [pathompong.c@samartcorp.com](mailto:pathompong.c@samartcorp.com)

The Head of Internal Audit Department will collect the information of whistleblowing or Complaints, then, inspect and analyze the information according to the following procedures :

The Head of the Internal Audit Department is initially responsible for investigating the alleged misconduct using documentary and witness evidence. If there is sufficient grounds for wrongdoing, the matter will be submitted to the Executive Chairman for consideration the appointment of the investigation committee.

The investigation committee consists of supervisor or representative from Internal Audit Department, Legal Department, and Human Resources Department, responsible for investigating the facts, including collecting all evidences in order to know details of the damage and impact to the Company.

The investigation committee will propose the results of the investigation to the Executive Chairman to consider and proceed and then the Internal Audit Department will propose the matter to the Audit Committee and the Company's Board of Directors for acknowledgement, respectively.

However, the whistleblower or complainant will be protected by the Company and the information will be kept confidential by not disclosing the name of the whistleblower to any person and does not affect the position during the investigation and after the end of the process.

### **Penalties**

Personnel who do not adhere to this policy must be considered for disciplinary punishment as determined by the Company. In addition, legal penalties may apply if the action is illegal.

### **Employee policies**

The Company highly regards all of the employees as invaluable resources and indispensable factor that propel the Company to meet all objectives and future successes. Henceforth, the Company is responsible to provide just opportunity, reasonable remuneration, promotion, transfer and development of potential by:

1. Treat every employee with respect to his/her right, honor and privacy.
2. Maintain conducive working atmosphere to promote better safety for their lives and properties.
3. Promoting, transferring, awarding and punishing, of employees are conducted with sincerity, and based on each employee's knowledge, potential, and appropriateness.
4. Pay importance on developing skills and potential of employees by constantly organizing various activities, for instance, seminars, training, and handing out scholarships for employees.
5. Avoid all unfair actions that may cause instability of employee's position.
6. Propose reasonable remuneration packages according to market situations, business competitions, job descriptions, work qualities including assessment of company's performance on short term and long term based on Company's capability to pay for that remuneration packages.
7. Provide the appropriate compensation such as medical fee, life insurance, annual checkup, reserve allowance fund, accommodation, subvention in case death of employees or employees' family, bus, fitness, and discount for the Company's products.
8. Provide opportunities for employees to express opinions and file complaints related to their jobs. Those suggestions and complaints will be seriously taken into consideration for formulating solutions. This important policy is meant to draw benefits to all parties and spawn camaraderie in the office.

### **Employee life and health safety policies**

1. The Company is committed to developing and creating safety and health of employees in accordance with the requirements of the law.
2. The Company will perform all necessary measures to ensure the safety of life and health of employees.
3. The Company seeks to control and prevent losses caused by fire, accidents and illness from working and maintain a safe working environment for employees as well as promoting and raising awareness of health care workers.
4. The Company will support adequate and appropriate resources in accordance with the requirements of the law and commit to develop human resources with knowledge and awareness of safety and health of employees.
5. The Company is aware that a safety and health of employees is very important, as duties and responsibilities of executive, supervisors at all levels and employee to comply with the rules and the requirements of the law.

### **Ethics of the Employees**

The Company trained and informed the prudent operating guidelines standards with regards to good manner and ethics of the employees via the orientation of the new employees, Employee Manual and HR website ([www.samarthre.com](http://www.samarthre.com)). Such ethics have been written in the working regulations of the Company for the employee's adherence as follows:

1. The employees must respect and comply with the rules and regulations specified by the Company.
2. The employees must respect and comply with the legally orders and recommendations of their superior as well as the persons designated by the Company.
3. The employees must devote themselves and perform their duties and the assigned works with their utmost competency.
4. The employees must protect the Company's benefits.
5. The employees must work on time and on regular basis.
6. The employees must perform the work with integrity.
7. The employees must have good disciplines as well as good morality.

### **Customer policies**

The Company strongly believes in building confidence and bringing satisfaction to all of the customers. Since their trusts are critical to our business, the Company promotes the following policies:

1. Determine to provide and produce commodities and services that are trendy to satiate customers' needs.
2. Provide high-quality and safe products and services at reasonable price.
3. Provide accurate information without any exaggeration that may cause misunderstandings on product's quality and quantity, or special conditions for each product and service.
4. Formulate procedures that permit customers to inform about drawbacks of the products or improper services, because those complaints are valuable for the Company to come up with immediate remedy and improvement for problematic products and services.
5. Provide effective after-sale services for customer's convenience.
6. Guard all customers' information as confidential and refuse to use them for personal benefits.
7. Support all activities that will strengthen, as well as maintain, lasting and good relationship between Company and customer.

### **Trade partners policies**

The Company must instigate fair treatment and mutual benefits to all trade partners because they are essential in contributing success to the Company. The Company has duty to:

1. Systematically provide products and services with the highest standard under these principles:
  - Must clearly specify conditions and regulations about purchase, hire and other related procedures.
  - Must compete based on congruent information.
  - Must have clear-cut rules in evaluation and selection for trade partners.
  - Require business partners to adopt a code of conduct or operate in compliance with corporate governance, social, and environmental principles, including;
    - Compliance with applicable environmental laws, standards, and regulations.
    - Compliance with laws and regulations relating to human rights.
    - Establishment of fair employment and working condition requirements.
    - Establishment of health and safety requirements are in place.
    - Adherence to business ethics requirements.
  - Must formulate fair agreements with trade partners, proceed as trading condition, contract and treat all related partner fairly
  - Establish a system to manage and monitor suppliers' performance and compliance with the business code of conduct or operations covering corporate governance, social, and environmental aspects, in order to ensure full compliance with contractual terms, prevent fraud and misconduct at every stage of the process, and align with sustainability principles.
  - All payments for business partners must be issued with punctuality and accuracy according to all conditions stated in the agreements.
2. Develop and maintain good relationship between all partners with trust and confidence. Keep in touch with customer in order to share each other opinion.
3. Refuse to accept any personal benefit offered by partners.
4. Refuse to fabricate or falsify information that will cause misunderstandings to partners.
5. Do not deal business with partner who may be involved in illegal and immoral activities.
6. Avoid purchasing product and/or service from business partners who violates human rights, intellectual property rights, or applicable environmental laws and monitor relevant information regarding such violations. If any such misconduct is identified, the Company shall avoid purchasing the products and/or services from such partner who is deemed to have an illegal behavior.
7. Do not disclose any partner's information except getting consent from that partner.

#### **Creditors policies**

The Company sticks to operate the business principled and orderly for reliance of creditors. The Company has duty to:

1. The Company is conforming to its Principle of Business Operation in order to the respect and admission of the Creditors and strictly, transparently and equally complied with terms and conditions agreed upon in the agreements.

2. In case of the contract cannot be fulfilled or tend to be unable to pay the debt or having financial problems, the Company will prior inform to the creditors and seeking mutual accepted solution.
3. The Company formulates a financial solution plan with regard to fairness of stakeholders, including creditors, as well as, monitoring the problem solving by requiring the management to report to the Executive Committee, regularly.
4. Consideration and resolve the financial problems of the Company carefully and reasonably.

#### **Counterpart / Competitor policies**

The Company conducts all business affairs under just rules and competitions, support free trading by holding the following principles:

1. Refuse to search for rivals' confidential information by all means, dishonestly or inappropriately.
2. Refuse to ruin counterparts / Competitors' reputations by accusing them of wrongful actions.
3. Refuse to violate intellectual property rights of business' counterparts / competitors.
4. Not intervene or have a concealed transaction that give negative impact to competitor and give benefit to the company.

#### **Money Laundering policy**

The Company realizes the importance of and adherence to criteria and laws relating to anti-money laundering. The Company will strictly adhere to the laws and regulations and Anti-Money Laundering Act B. E. 2542 including its amendments.

#### **Tax policy**

The Company's tax practices shall be fully and correctly pursuant to the laws as follows:

1. Tax planning and management by paying tax correctly and completely as per specified by the laws.
2. Remit tax within the period of time specified by the law.
3. Conduct risk assessment which may impact to tax payment correctly.

#### **Sustainable Development Policy**

The Company realizes the importance on sustainable development that shall lead to sustainable growth of the business, so it has to be developed together with the social responsibility, environment and corporate governance as well as specified the Sustainable Development Policy as follows:

1. To commit to develop the organization based on good governance by supervising the affiliated companies to conduct business with transparency, fairness, and effective risk management. Finding the opportunities for business expansion and investing in the new businesses, and returns benefits to the stakeholders effectively and sustainably.

2. To promote business operations with responsibility to customers, partners, communities, society, as well as employees of the organization by setting policies and practices to treat all parties in the business value chain with fairness and comply with human rights principles.
3. To promote environmental conservation and the efficient use of resources, as well as encourage affiliated companies to develop and present the technologies which are friendly to the environment.

The Company's specify responsibility to society, community and environment practices as follows:

- **Responsibility to society and Community**

The Company recognizes that sustainable business operations require the support of society and communities. The Company is therefore committed to conducting its business while creating value for society, communities, and stakeholders across all sectors, based on the principles of social responsibility. The Company has established the following guidelines and practices:

- 1. Participation in Social and Community Development**

The Company places importance on continuously contributing to social and community development by supporting social activities in various forms, including financial contributions, donations of goods, construction and renovation of public facilities, as well as the provision of technological tools and equipment, including information, communication, and digital technologies. These efforts aim to enhance the quality of life, safety, and environment of society and communities. In addition, the Company encourages participation in activities that preserve good traditions and cultural heritage and acts as a good adherent in supporting religious activities on a regular basis.

- 2. Promotion of Education, Capacity Development, and Support for the Underprivileged**

The Company recognizes the importance of supporting education, academic and professional development, the promotion of sports skills, and assisting underprivileged groups in order to enhance quality of life and create opportunities for individuals in society to develop their potential.

- 3. Strengthening Relationships and Cooperation with Communities**

The Company strives to build strong relationships with surrounding communities, including government agencies, private sector organizations, and community leaders at various levels, in order to promote cooperation in sustainable and tangible social and community development.

- 4. Disaster Relief and Assistance**

The Company is committed to consistently providing assistance to those affected by disasters and other incidents by mobilizing resources, financial support, and necessary supplies, including the provision of equipment and tools to facilitate the work of relevant agencies and to assist affected communities.

## **5. Promotion of Technological and Business Innovation for Society and/or the Environment**

The Company encourages the development of innovations in communication, information, and digital technologies, as well as business innovations, to create value for the Company's products and services while improving people's quality of life and/or reducing environmental impacts. The Company also supports the dissemination of beneficial innovations to promote learning within society and communities.

## **6. Promoting Awareness of Social and Environmental Responsibility**

The Company promotes and instills awareness of social, community, and environmental responsibility through education, training, internal communication, and various activities on an ongoing basis to ensure that the Company's operations are conducted responsibly and in alignment with sustainable development.

## **7. Management of Negative Social and Environmental Impacts**

The Company manages social and community impacts by assessing risks and monitoring potential negative impacts arising from business operations, and by implementing preventive, corrective, and mitigation measures to effectively avoid and reduce adverse impacts on society and communities.

### **● Responsibility to environment**

The Company recognizes the importance to operate the business by considering about environmental protection, using resources wisely and knowing their value as well as developing and introducing technology that is beneficial to the environment. The Company has supported various environmental projects and raising awareness among the employees seriously and continuously to create participation in keeping sustainable environmental. Therefore, the Company set the environmental policy for affiliated companies to adhere and comply with as follows:

1. Policy for managing the use of resources with the most value and benefit covered to the use of water supply, electricity, office equipment and vehicle fuel, etc.
2. Policy for the products development and technology services to promote sustainable conservation of natural resources and the environment.
3. Policy for cultivation of environmental sustainability awareness among the employees and the stakeholders of the Company's value chain through media and activities continuously.

### **Human rights policies**

The Company adheres and follows with human rights policy in business operations in accordance with the Universal Declaration of Human Rights ("UDHR") to ensure that the Company's operations are free from human rights violation. The Company deems it appropriate to formulate policies and guidelines to prevent human rights violation in all business activities of the Company including business partner in business value chain and business associates are aware of the policies in the same principles and practices as follows:

### **1. Employees treatment with equality**

- The Company treats employees with equality and non-discrimination regardless of race, nationality, language, religion, sex, age and education.
- The Company do not support or affiliated ourselves with child labor-under the legal age or forced labor within the Company or our supply chain.
- The employees show respect to and acceptance of others, and acts appropriate with job as the Company's regulation and tradition without disgrace to the image of the Company.
- The Company gives employees the opportunities to demonstrate their full abilities by determining appropriate compensation in accordance with the Company's regulation. The Company also provides employees with the opportunities for self-improvement such as higher education, short-term / long-term training.
- Employee assessment will be assessed purely on merit and the process must be done in proper and unbiased method.
- When performing the work, the employees must avoid from comments in regard to difference of physical, mental, race, nationality, language, religion, sex, age, education, or any matters that could lead to cause conflict.
- The employees should monitor and reinforce the working environment free from discrimination and injustice.
- The employees show respect and tolerance for each other's opinions.

### **2. Equal treatment and indiscrimination of the Company's stakeholders**

The Company conducts business activities which will not affect both directly and indirectly on human rights of the Company's stakeholders such as employees, communities, suppliers, business partners, customers and treat them equally without discrimination.

### **3. Human Rights Risk and Impact Assessment**

The Company shall continuously develop and conduct human rights management due diligence process to identify human rights risks and impacts and potentially affected stakeholders in order to plan for corrective and preventive actions as well as provide appropriate mitigation plan towards affected groups.

### **4. Suggestions and complaints of human rights violation**

In order to encourage knowledge, understanding of human rights code of conduct, as well as allowing employees and stakeholders to have a channel of voicing their concerns and comments. Employees and stakeholders can send mail or emails toward the Company's website ([www.samartcorp.com](http://www.samartcorp.com)) under "Contact Us" in case there are incidents or misconduct or violations of human rights.

## **5. Monitor and follow up**

The Company shall monitor and follow up on the process of human rights violation management in accordance with the Company's guideline as well as supporting and mitigating the affected groups from the Company's actions.

## **6. Penalty**

Any person who violated this human rights policy are considerate violating against the Company's business ethics and shall be disciplined in accordance of the Company's regulation. In addition, violators may be penalized legal punishment if such action is illegal.

### **Operating policy on non-infringement of intellectual property or copyright**

The Company has an operating policy on non-infringement of intellectual property or copyright. The method employed by the Company regarding this matter is that all employees are required to sign their names in memorandum of understanding to not commit any computer crime and to not infringe any intellectual property. The Company has specified the policy on usage of information technology system of Samart Group of Companies and software program of the employee shall be inspected to prevent any usage of piracy software and software which is unrelated to work.

### **Conflicts of Interest**

To prevent conflicts of interest, the Company has drawn out guidelines for directors, managements and employees to follow.

1. Avoid all actions that may cause conflicts of interest with the Company;
2. In case that directors, managements or employees commit any action related to the Company, the particular director, managements and employee will be treated like an outsider, and will play no part in decision-making process;
3. Refuse to use Company's information obtained in their posts for an opportunity to derive personal benefits by creating rivalry with the Company or involving in related businesses;
4. Refuse to use Company's information to buy shares for personal benefits or to leak Company's information to outsiders for their benefits;
5. Refuse to reveal Company's classified information e.g. electronic information, financial situation, work's plans, business information and Company's future plans during and after their posts.

If the conflict of interest is happened, the Audit Committee will consider and propose to inform the Board of Directors about conflict of interest and connected transaction. The Board of Directors should consider carefully and comply with the Securities and Exchange Act. Despite price and condition will be accounted like an outsider (Arm's Length Basis) and disclosed the detail, size, partner of contract, and reason in Annual Registration Statement / Annual Report (Form 56-1 One Report) as well as notes to financial statements for

consideration of connected transaction. Any consideration of the connected transaction, the directors who may have conflict of interest will neither participate nor vote in such meeting both in the Board of Director's and the Shareholders' Meeting.

**Responsibilities to shareholder**

The Company upholds a principle to treat every shareholder without any discrimination.

1. Operate all business affairs with moral conducts. All decisions are carefully made with fullest attention to accomplish fair deal and maximum benefit to every shareholder.
2. Monitor and operate to ensure that appropriate transactions from financial management to administrative strategies are properly carried out to protect and raise benefit for shareholders.
3. Determine to maintain sustainable growth and stability of the Company, thus all shareholders can enjoy long-lasting benefits due to Company's superb performance and its efficiency and effectiveness in delivering all tasks.

Respect shareholder's right to information for evaluation purposes. Oblige to truthfully reveal annual income, financial status with other supporting documents with accuracy. Such practice is mandated by the Stock Exchange of Thailand and the Office of the Securities and Exchange Commission.