

# *Code of Conduct*

Tycoons Worldwide Group )Thailand (Public Co., Ltd. conduct business under good corporate governance by adhering to the principle of responsibility, transparency according to the law, honesty adhere to morality. Develop products and services that focus on creating product value and business value in the long term. Have equal responsibility to all involved parties. Take care and be responsible for society and the environment, by requiring directors, executives, and employees at all levels to strictly adhere to the Code of ethics as follows.

## **Customer**

The Company adheres to and strictly complies with business conditions with customers. Present sufficient product information for customers to make decisions in order to provide reliable quality products and services, along with giving advice and work together to innovate services and new innovations to add value to products and create added business value including maintaining good and sustainable relationships with customers.

## **Shareholders**

The company adheres to and maintains honesty and integrity. Using the principles of carefulness, prudence and fairness in conducting business. To create the highest returns for shareholders in a sustainable way. Create transparency and disclose information of Company performance report to shareholders equally, regularly and completely according to reality.

## **Employee**

The Company has established a policy to treat all employees equally according to the principles of respect for human rights according to international principles and have employees treat all co-workers with respect for honor, dignity, and personal rights. The Company will collect and maintain the personal data of employees only in those areas that are necessary for the performance of their jobs. and as required by law. It is considered a secret and disclosure of such information will be made only if the person legally entitled to know is required to know.

## **Partners and Contractors**

The Company places importance on treating trading partners and contracting parties according to trade conditions or agreements between each other, avoiding situations that may cause conflicts of interest. Including the criteria for evaluating and selecting partners or contracting parties fairly. Intension to develop and maintain sustainable relationships.

## **Trade competitors**

The Company should conduct business according to the rules of free and fair competition. Do not destroy reputation or distort information to cause wrongful damage to business competitors and do not use social issues as a competitive advantage.

## **Community, Society and Environment**

The Company gives importance to development and responsibility to the community, society and the environment. Along with running a business, promoting public activities for the community and society as a whole. Seriously implement policies to conserve natural resources and preserve the environment both inside and outside the organization. Including cooperation and strict compliance with laws related to the environment.

## **Confidentiality**

Employees must maintain the confidentiality of information in the performance of business duties or in doing anything with customers or business partners by taking care to keep confidential information safely, be careful not to expose the Company's confidential documents or information or related partners. Leaked or falls to unrelated people, which causes an impact to the Company or other persons, including using such information to seek illegal personal benefits and others. Even when retire, resign or end working with the Company, unless such disclosure has been properly assigned by the Company or disclosure required by law.

## **Disclosure of internal information**

Disclosure of any information of the Company. It should be done only by those with authority as assigned by the Company and information should be disclosed based on truth, accuracy, thoroughness and equality, according to the requirements of government agencies and laws.

## **Having a stake and conflicts of interest**

Directors, executives, and employees should perform their duties by considering the benefits of the Company's in mind. Without personal desires or influence from those close persons. Including always being aware that there will not have any vested interest or conflict of interest in work. Whether it is money, property or any other benefits and do not engage in business that is in conflict with the Company's interests.

## **Preventing and Anti-Corruption**

Directors, executives and employees should perform their duties with carefulness and honesty, which complies with the principles of good corporate governance and the requirements of the law strictly. Directors, executives, and employees will not participate in corruption both directly and indirectly. Do not consent and resist giving or receiving property, gifts, bribes, or any other form of benefit that exceeds what is necessary according to customs and traditions and do not do anything to seek illegal benefits.

## **Use of information technology and intellectual property**

The Company encourage the use of information technology in business operations and as a communication tool. Taking into account the benefits of the Company as important. Directors, executives, and employees have duties and responsibilities to perform their jobs carefully, be careful in using information, respect personal rights, not infringing intellectual property rights or against good morals, including complying with laws, regulations regarding the use of information technology.

### **Orientation for new directors**

In the event that new directors are appointed who has never held the position of director or senior executive of the Company before. New directors must undergo orientation by senior executives or the Company secretary to be aware of important Company's rules, regulations, articles and information. Nature and policy of business operations good corporate governance policy, Code of ethics and other important information of the Company. In addition, the Company has guidelines promote and support directors and senior executives attend training in related courses, allocated adequate budget has been set aside in order to use the skills, knowledge and experience gained to continuously develop the Company.

### **Exercise of political rights**

The Company is politically neutral. Directors, executives, and employees can exercise their political rights under the provisions of the constitution. But must not pretend to be a Company employee or bring any property, equipment, or tools of the Company to use for the benefit of any operation in politics and should avoid exercising rights or political activities that are considered illegal or create divisions in the workplace and in society.

### **Respect human rights**

The Company supports and respects human rights principles, without being involved in against human rights, including not supporting or promoting such human rights violations.

### **Using resources and maintaining Company assets**

Directors, executives, and employees have duties and responsibilities in using resources and maintaining the use of Company assets to get the most benefit and do not use the Company's resources or assets for personal benefit or third parties, including misuse in the wrong way.

### **Internal control and internal audit**

The Company has a policy to have a good internal control system. There is an assessment and management of risks to an appropriate level along with an internal audit system with an audit committee to closely supervise and allocate efficient personnel for internal auditing. Directors Executives and employees attach importance to the internal control system and internal audit.

### **Compliance with laws, rules and regulations**

Directors, executives and employees must conduct themselves within the framework of the law, rules and articles regulations and must not be involved in or assist in any actions, which is against the law, rules and articles regulations, including following traditions, good culture, morals and ethics.

### **Conflict of interest**

The Company expects all executives and employees to make business decisions taking into account the maximum benefits of the Company and the Company's customers. They must not allow their personal reasons or their family to influence decisions that cause them to deviate from the above principles and has the nature of seeking personal benefits that conflict with the interests of the Company and its

customers. The executives and employees must not do anything to seek benefits or misappropriate property which is or should be owned by the Company or the Company's customers. The management and employees should avoid the situation or having personal activities and having financial benefits which may conflict with the duties that executives and employees are bound by. If the positions, duties and responsibilities of executives and employees have an effect that will benefit them both directly and indirectly or family members and relatives or outsiders, such executives and employees should not be involved in any action decisions and must notify line supervisors immediately. The Company will avoid delegating responsibilities to executives and employees in the event that it may lead to a situation that may cause a conflict of interest of the Company or contrary to the interests of the Company's customers. The involvement of executives and employees in carrying out activities outside the organization or holding a position outside the organization, such as being a director, consultant, representative, or employee in another organization, such activities must not cause conflicts of interest with the Company and its customers, either directly or indirectly and must not cause damage to the Company including it must not affect the performance of that person's duties. Executives and employees are prohibited from joining or accepting any position, in the organizations that conduct similar to the Company business and competes with the business of the Company and affiliated companies or businesses that may have conflicting interests with the Company.

#### **Advance notification before trading securities**

Directors, executives, persons designated by the Company and any other employees who know and/or are in possession of the Company's internal information who wish to buy or sell the Company's securities must notify the Company secretary or the person assigned by the Company's board of directors at least 1 day in advance before trading.

#### **Ensuring compliance with Code of conduct**

Directors, executives, and employees of the Company have a duty to acknowledge, understand, and strictly follow the code of conduct. Executives and supervisors must be good examples in following the business ethics and have a duty to monitor, supervise, and encourage subordinates to strictly comply with the prescribed code of conduct.

In requesting exemption from compliance with this code of conduct must be approved by the Board of Directors.

#### **Reporting non-compliance with the Code of conduct**

Those who witness wrong doing through violations against or intentional failure to comply with the code of conduct specified in this manual must be reported directly to your supervisor or report to following related persons:

- Line Supervisor which the offender belongs
- The highest authority in the human resource management
- Company Secretary
- Board of Directors through the Company secretary, Mr. Wen Chun Feng, it can be sent to [wen@tycons.com](mailto:wen@tycons.com) or Company secretary address Tycoon Worldwide Group (Thailand) Public

Company Limited No. 99 Moo 1, Nikhom Phatthana, Nikhom Phatthana, Rayong, 21180.  
Telephone 033 -658558 ext. 1301

The Company has a policy to well keep confidential information and information of whistleblower. The Company takes into account safety and damage that may occur to the whistleblower or related witnesses.

**Disciplinary punishment**

The Company's Code of ethics is considered a form of discipline. If found to be in violation violate or do anything that is contrary to compliance with the Code of ethics set forth herein, the Company will consider punishment according to the nature of the offense as appropriate to the case.

Board of Directors Resolution No. 1/2024

Effective from: 27 February 2024