

## Code of conduct and ethics of the Company and subsidiaries

### Stark Corporation Public Company Limited

In order to comply with the best practices regarding the ethics and morals of the Company and its subsidiaries, Stark Corporation Public Company Limited (the "Company") and subsidiaries to conduct business in accordance with ethical and ethical practices is an important basis for enhancing and upgrade good corporate governance and are the cornerstone of stability and sustainable growth. As well as something that will support the group to achieve set objectives. Therefore, the Company encourages the business operations and performance of the relevant parties of the Company and its subsidiaries to comply with the ethical and ethical practices as follows:

#### Code of Conduct and Business Ethics

##### 1. Treatment of Stakeholders

The Company and its subsidiaries adhere to the code of conduct and business ethics. Therefore, guidelines for treating stakeholders are as follows:

###### 1.1 Ethics to shareholders

Directors, executives and employees of the Company and its subsidiaries perform their duties with honesty, transparency, and reliability. As a representative in conducting the business of shareholders by providing disclosure or reporting of important information, situations and future trends of the business of the Company to shareholders in its entirety, consistently, taking into account the maximum benefits that shareholders will receive. Under regulation Requirements and relevant laws strictly. Providing an opportunity for shareholders to propose the agenda of the annual general meeting of shareholders and nominate qualified individuals to be nominated as Company directors in advance every year. Through the Company's website, which the Company has notified through the news system of the Stock Exchange of Thailand for the shareholders to be informed including the rules on those matters on the Company's website.

###### 1.2 Ethics to employees

Employees are an important resource to drive successful business operations, so the Company attaches importance and prescribes practical guidelines and responsibilities to employees as follows:

- 1.2.1 Treat all employees equally and fairly. Respect for individuality and respect the privacy of employees by not disclosing the employee's information without permission, unless disclosed in accordance with the provisions of the law including complying with labor laws and other laws strictly related.

1.2.2 Providing fair compensation that is suitable for the knowledge, capability and duties assigned by each employee. And focus on continuous development of knowledge and capability, including providing appropriate welfare for employees.

1.2.3 Pay attention to the working environment by considering the safety and occupational health of the employees.

### 1.3 Ethics to customers

The Company is committed to maintaining a good long-term relationship with customers. Therefore, has established guidelines and responsibilities to customers as follows:

- 1.3.1 Deliver quality products and services that meet customer needs at a reasonable price.
- 1.3.2 Disclose news, information about products and services completely, accurately and without concealing, distorting facts.
- 1.3.3 Treat customers fairly and allow customers to make complaints about products or services as appropriate.
- 1.3.4 Keep confidentiality and do not disclose customer information without permission, unless disclosed in accordance with the provisions of the law.
- 1.3.5 Follow the terms and conditions with customers fairly. If unable to comply with the terms or conditions, must notify the customer to find a joint solution.

### 1.4 Ethics to business partners and creditors

To make the Company's business run smoothly and continuously, it requires support and good relations with business partners and business creditors. The Company takes into account the equality of business operations and mutual benefits. Suppliers must be honest, fair, transparent, verifiable, and avoid situations that may lead to conflicts of interest. In addition, the Company adheres to all contractual agreements and conditions with trade partners and creditors in the payment or reimbursement in accordance with the specified time, including the overseeing of various collaterals. In the event that it is unable to comply with the terms and conditions of the contract with the customers and creditors, the negotiation with the partners and creditors will be expedited to find a joint solution.

### 1.5 Ethics to competitors and trade competition

The Company supports and encourages free and fair trade competition, adheres to good competition rules and does not use any methods. In the pursuit of confidential information of competitors in order to disclose, to reduce any credibility or to damage the reputation of competitors or to violate the business ethics of the Company and its subsidiaries.



#### 1.6 Ethics to society community and environment

The Company instills awareness among employees to feel responsible to society, communities and the environment by encouraging the directors to executives and employees behave as good citizens and abide by the laws and regulations of the society. Maintain good traditions, culture and traditions, as well as encourage employees to participate in various activities that are beneficial to society, communities and the environment, as well as encourage directors, executives, and employees to have good awareness of environmental preservation both inside and outside the organization. To have awareness of using resources or materials and equipment that are cost-effective and maximum efficiency. And strictly abide by the laws, regulations regarding safety, occupational health and environment.

#### 1.7 Ethics regarding quality, safety and occupational health

The Company gives importance to the quality of safety and occupational health by providing knowledge to the directors, executives and employees regarding the safety, occupational health and the environment, especially in the operating area. In such area immediately and report the relevant department to remedy the said danger condition before continuing to work, including studying and rehearsing various emergency plans to reduce or prevent damage in case of various emergency

### **2. Conflict of Interest**

Directors, executives or employees of the Company and its subsidiaries are responsible to protect the maximum benefits for the Company and the shareholders by avoiding actions that may cause conflicts of interest which can occur in many forms. Therefore, there are policies and guidelines to prevent conflicts of interest that everyone should abide by as follows:

#### 2.1 Receiving money or benefits

Directors, executives and employees of the Company and its subsidiaries must not accept any personal money or compensation. Whether directly or indirectly from customers, business partners or any other person due to working on behalf of the Company, including not allowing loans or soliciting funds from customers, business partners, or those who do business with the Company, except for loans from banks or institutions financial status as the customer of the said bank or financial institution.

#### 2.2 Other business operations

Directors, executives and employees of the Company and its subsidiaries are able to operate their own businesses, but they must not affect the performance of their duties and working hours. And

prohibiting to conduct business or participate in businesses of the same condition or being a competition with the business of the Company and its subsidiaries, whether directly or indirectly.

### 2.3 Doing any business with the company

Directors, executives and employees of the Company and its subsidiaries must disclose the conflict of interest to the Company before doing any business or transaction with the Company, both in the personal, family, or on behalf of any entity on its own stakeholders. And must not involve in the decision-making or approval of entering into the transaction or acting on behalf of the Company and its subsidiaries.

In this regard, the person making the transaction on behalf of the Company and subsidiaries. Must check the relationship of the trade partners that are related to the directors, executives or employees before entering into the transaction to prevent any conflicts that may occur. The definition of the relationship is in accordance with the announcement of the Stock Exchange of Thailand.

Subject: Disclosure of information and the operations of listed companies in connected transactions

## 3. Offering Money, Incentives or Special Benefits

The Company has no policy to offer money, incentives, gifts or special benefits in any form to customers, business partners, external agencies or any other persons in order to obtain business. Except commercial discounts project for promotion of the Company and its subsidiaries and traditional gift giving under the conditions specified in the Company and its subsidiaries' anti-corruption policy.

## 4. Labor and Human Rights

The Company respects human rights and labor rights by treating employees at all levels with equality and fairness, without discrimination, race, religion, gender, age, education or other matters. And will not tolerate any type of human rights violation in the Company, including strictly abiding by labor laws and other relevant laws, whether it is hiring, labor protection, compensation or working period etc.

## 5. Political Activities

The Company is politically independent by not providing financial support or acting as a political party. However, does not block the rights of directors, executives, and employees to participate in political activities under the provisions of the state law. However, they must not impersonate employees or use any assets of the Company and its subsidiaries or that represent the Company and its subsidiaries to use for political benefits and should avoid activities that may lead to an understanding that the Company and its subsidiaries have supported or supported a political party.



#### 6. Donations to Charities and Funding

The Company provides oversight of donations or grants by having a written letter or memorandum and considering the implementation of the approval authority. This is to confirm that donations or financial support are correct, complete and transparent. Must have a receipt and/or a thank you letter and / or a letter of acceptance and / or a photograph for reference.

Donations may be in the form of money, items, or participation in activities such as scholarships, research and development funds, educational donations, or participation in various social activities. However, all forms of donations or providing financial support, must not act as an excuse for corruption in any way.

#### 7. Protecting and Maintaining Company Assets

Directors, executives and employees have a duty and a responsibility to take care of Company property with care and with the best interest of the Company not be used for personal benefit or other activities not related to the company without permission. In this regard, the Company has documented and recorded complete assets of the Company for the convenience of inspection.

#### 8. Use of Inside Information and Trading of Company Securities

Directors, executives and employees at all levels including those who know inside information about the operations of the Company and its subsidiaries. Must not use such internal information to trade the Company's securities from the date of knowing the information until the information has been disclosed to the public, and prohibiting the disclosure of insider information in order to create a price for the Company's securities

The Company has no policy to disclose any information before the financial statement is disclosed through the information disclosure system of the Stock Exchange of Thailand.

Directors, executives and employees of the Company and subsidiaries have the right to invest and trade the Company's securities but to prevent any conflicts of interest. Therefore, trading is prohibited during the 30 days before the financial statements are publicized. And will be able to trade at least 24 hours after the information has been disclosed. If the trading of the Company's securities other than the said trading hours, the trading must be reported to the Office of the Securities and Exchange Commission (SEC) within 3 working days after the transaction.

#### 9. Information Disclosure

The disclosure of any information about the Company and its subsidiaries must be based on truthful information, correctness, and carefully handled. The person responsible for the disclosure of the Company's information must be assigned only by the authority of the Company in order to prevent the information disclosed to the public to affect the reputation and business of the Company.

Directors, executives and employees must properly control confidential information and must not communicate any material information that has not yet been disclosed to the public, regardless of the perceived information from their duties or channels. And make the utmost effort to protect the confidential information, including the storage of confidential information as well.

#### 10. Related Party Transactions

The Company has a policy to enter into related party transactions or connected transactions of the Company and its subsidiaries in order to be a guideline for supervising the operations of the Company and its subsidiaries.

In the event that there is a connected transaction, whether within the Company, every person or juristic person that is connected with the Company and that subsidiary company, must comply with the criteria and procedures for consideration and approval, taking into account the best interests of the Company. Is important and must be done with the same business conditions as those done with third parties.

#### 11. Money Laundering Prevention

Directors, executives and employees of the Company and its subsidiaries will not transfer or changing property conditions or supporting the transfer or changing of property related to the offense to prevent people from using the Company's business channel for transferring conceal or disguise the source of unlawful property, regardless of whether it causes damage to the Company and / or various stakeholders of the Company.

#### 12. Intellectual Property

Directors, executives and employees of the Company and its subsidiaries must abide by the laws, regulations, and must not be involved. Assisting or acting in violation of intellectual property rights, including copyrights, patents, trademarks, trade secrets, which are considered important in maintaining business advantage. It is also responsible for protecting the intellectual property rights of all companies and subsidiaries, including respect for the intellectual property of others.

#### 13. Compliance with Laws, Rules and Regulations

Directors, executives and employees of the Company and its subsidiaries must comply with laws and regulations, and must not be involved in any violation of the law, rules and regulations, including the case that they must perform their duties in foreign countries must study and comply with the laws, regulations of that country strictly.

#### Management and Maintenance Code of Conduct and Business Ethics

- 1) Directors, executives and employees of the Company and its subsidiaries have a duty to know, understand and strictly comply with the code of conduct and business ethics. If found to be a violation or any action that violates the business ethics, will consider and take action by a verbal or written warning and in the event that it violates the rules and regulations of work and will consider.



Punish according to the nature of the offense as appropriate to the case such as suspension or termination without compensation or legal action.

- 2) Directors, executives and employees must not take any action that avoids the maintenance of business ethics or is shared with members of the family, relatives, or close ones, to take any action that avoids code of conduct and business ethics for indirect personal benefit too.
- 3) Executives and supervisors must be good role models in adhering to the code of conduct and business ethics, and have to oversee and encourage subordinates to comply with the code of conduct of the Company.

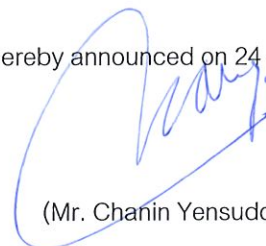
#### Reporting Non-Compliance with the Code of Conduct and Business Ethics

Directors, executives and employees of the Company and its subsidiaries are responsible for reporting practices that may violate the Code of Business Conduct of the Company. In case of being seen or being pressured / forced to take any action that is against the business ethics, immediately report to the supervisor or senior management or report complaints through the channels specified by the Company as follows:

- Listen and opinion box at specific points within the office
- Send a letter to Stark Corporation Public Company Limited, "Report a complaint"  
Address: 518/5 Maneeya Center Building 16<sup>th</sup> Floor, Ploenchit Road,  
Lumpinee, Pathumwan Bangkok 10330
- E-mail: [info@starkcorporation.com](mailto:info@starkcorporation.com)
- Telephone: +66 2680 5800

In this regard, the Company has a policy to protect the confidentiality and protect the person reporting the information in order to prevent the impact from reporting or reporting the said clue.

Hereby announced on 24 July 2020



(Mr. Chanin Yensudchai)

Chairman