



**Code of Conduct**

**Sammakorn Public Company Limited**

Approved by the Board of Directors' Meeting No. 1/2024

On 20 February 2024

## **Message from the Chairman of the Board**

Dear All Directors, Executives and Employees

Sammakorn Public Company Limited (“Sammakorn”) recognizes the paramount importance of conducting business with honesty, accuracy, transparency, straightforwardness, morality, and responsibility to society and all stakeholders. Adhering to the principles of corporate governance, the Board of Directors has enhanced this Code of Conduct to instill in all directors, executives, and employees a heightened awareness and understanding. They are urged to apply it as a guiding framework in the performance of their duties. Sammakorn places emphasis on balanced development across economic, social, and environmental dimensions, believing that this approach will lead to stable and sustainable business growth. This, in turn, fosters acceptance, trust, and confidence from all stakeholders.

The Board of Directors has documented policies and practices concerning the Code of Conduct and regularly reviews them at least every one or two years. In the event of any significant changes, the aim is to enhance policies and practices, making them comprehensive and aligned with the guidelines of the Stock Exchange of Thailand and other relevant agencies. This is done to adapt to evolving business circumstances and to ensure alignment with the anti-corruption policy and guidelines established by Sammakorn.

Sammakorn sincerely hopes that all directors, executives, and employees at every level will cooperate diligently in strictly adhering to this Code of Conduct

( Mr. Bibit Bijaisoradat )

Chairman of the Board

Sammakorn Public Company Limited

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## 1. Vision, Mission, and Core Values

To serve as the principle and guideline for all employees, fostering a collective commitment to lead Sammakorn Public Company Limited towards sustainable development.

### Vision

*“Sammakorn Public Company Limited is dedicated to crafting high-quality real estate for the well-being of the Thai people at affordable prices. We aspire to establish a sustainable business, cultivate an effective workforce, and remain an organization that prioritizes the welfare of customers, employees, and society.”*

By 2025, empowered through the provision of infrastructure (areas, systems, strategies, personnel), instilling strong work values, and providing guidelines for personal development, Sammakorn is poised to confront changes or obstacles. With the ambitious goal of reaching a centenary milestone, Sammakorn aims to become the foremost designer of living spaces, deeply understanding the lives of Thai people. We are committed to delivering quality homes, creating comfortable sleeping areas for Thais to rest fully, and be ready to face life the next day.

### Mission

#### Thai Family

Over the course of 50 years, Sammakorn has navigated through era changes and societal transformations, enabling us to develop a profound understanding of the Thai way of life. We are committed to delivering comfortable homes for every family member, designing living spaces based on a deep understanding of life, and prioritizing quality. Sammakorn aspires to play a significant role in providing Thais with spaces for an enriched life at cost-effective prices.

#### Sammakorn Family

Sammakorn aims to be a sustainable home for continuous employee growth, conducting business with honesty. We strive to provide a space for family members to thrive, promote self-development to create quality members of society, believe in what we do, and demonstrate determination and dedication. Our goal is to maximize benefits for the residents, and we are always ready to adapt to changing situations.

### Core Values

- Excellent Management
- Efficient Personnel Development
- Best-quality Product Development
- Service Beyond Expectations

### Business Ideology

Sammakorn Public Company Limited has been engaged in the residential business for an extended period, consistently adhering to the business ideology encapsulated in the philosophy of ***"Sammakorn - Building based on Life Understanding - with over 50 years of experience."*** Executives and employees at all levels have consistently embraced this business ideology. The key guidelines include:

**Committed to developing quality**

We undertake construction projects in various patterns and standards, while improving project quality, services, sales management, and pre- and post-sale services to enhance efficiency, ensuring continuous responsiveness to customers' needs.

**Committed to emphasizing personnel**

We provide our personnel, a highly valuable resource of the Company, with opportunities for development, fostering knowledge, competency, morality, and determination in performing duties for the progress and success of the organization.

**Committed to strengthening society**

We provide individuals, organizations, educational institutions, and related parties with assistance and support, working collaboratively to create a good and quality society, community, and environment.

In addition to the mentioned business ideology, the Company's Board of Directors is well aware of its mission to foster a corporate culture that emphasizes ethical values. This is a crucial factor in building confidence among customers, investors, and stakeholders. Therefore, the Code of Conduct and good practices are documented for the Board of Directors, executives, and employees at all levels. This documentation enables them to understand the ethical standards applied by the Company in conducting business, serving as a correct and morally consistent guideline for the mutual and sustainable benefit of all stakeholders.

**Corporate Culture**

**I - CARE**

- C : Can Do**                      *"If there is a possibility, we will try and do it."*
- A : Active**                      *"Eager to understand and solve problems"*
- R : Resourceful**              *"Seek for knowledge and find solutions"*
- E : Empathetic**              *"Understand how to live life and empathize our customers"*

**Company's Concept and Goal**

*"Building based on Life Understanding" – Sammakorn, a home that sleeps comfortably, without worries*

## **Code of Conduct**

Sammakorn has prepared this Code of Conduct in writing to serve as a guideline for the Board of Directors, all executives, and employees at all levels who all represent the Company. It is essential for them to understand and strictly adhere to the organization's code of conduct. This Code of Conduct is a commitment to responsible operations, benefiting all stakeholders. The Board of Directors, supervisors, or those assigned by the Company to oversee must diligently monitor employees at all levels to ensure strict adherence. This approach promotes a corporate governance system that primarily adheres to the principles of honesty, fairness, responsibility, and transparency. Any violation will result in disciplinary action in accordance with the Company's regulations.

Sammakorn has compiled and collected important policies and procedures for all directors, executives, and employees. This initiative aims to promote actual practice throughout the organization until it becomes ingrained in the organizational culture and core values.

## **Ethics for Directors and Executives**

### **Practices and Responsibilities**

1. To dedicate time to managing the organization with full commitment and capability, exercising care and caution, and always prioritizing the best interests of the Company.
2. To perform their duties in accordance with laws, rules, regulations, and policies related to business with honesty and integrity. Decisions shall be made with transparency and fairness to all stakeholders, prioritizing the utmost benefit of the shareholders as a whole.
3. To regularly report the performance and status of the organization completely and truthfully according to the schedule, adhering to ethical standards in performing duties.
4. To disclose data and present information, such as consistently accurate, complete, and timely financial reports, including both annual and quarterly budgets prepared according to accepted accounting standards.
5. To perform their duties to the best of their knowledge, contributing to the development and sustainability of the organization.
6. To manage and maintain the organization's assets, protecting them from depreciation and illegal loss, and to use the Company's assets and resources economically for the utmost benefit.
7. To ensure efficient management, treat all those related to the Company, including stakeholders, equally, and avoid conflicts of interest that may occur, both directly and indirectly.
8. To refrain from accepting bribes, gifts, entertainment, or any other benefits from involved parties, except for the benefit of the Company's operations, and ensuring that such transactions involve righteous deeds at a reasonable value.

9. To refrain from using their own power to seek benefits for themselves and others involved, utilizing any information from the organization that has not yet been disclosed to the public or outsiders. Additionally, to abstain from leveraging the opportunities or information obtained as a director or executive to engage in business competition with the Company. Also, to have no interest or stake in business dealings with the Company, either directly or indirectly.
10. To refrain from taking any action in a manner that may cause a conflict of interest to the organization.
11. To maintain their honor, be accepted by society, and position themselves appropriately in their roles, duties, and responsibilities.

## **Ethics for Employees**

### **Practices and Responsibilities**

1. To perform duties in accordance with laws, rules, regulations, and orders of the Company, including policies related to business, with honesty and integrity. To behave in accordance with the principles of law, tradition, and morality, refraining from any actions that may damage the Company's reputation.
2. To be responsible for their own duties; perform work responsibly, attentively, and with dedication, prioritizing the best interests of the Company.
3. To perform their duties with determination, honesty, self-dedication, time dedication, and the best knowledge and abilities to ensure the Company's achievement of set goals and effective task completion.
4. To use the Company's assets for maximum benefit and value, to refrain from using or allowing anyone to use them for personal gain, both directly and indirectly, or diminishing the benefits of the Company, and to assist in maintaining the Company's assets to prevent any improper loss.
5. To treat others with respect for individual rights and mutual consideration
6. To maintain the confidentiality of Company, customer, and business partner data, taking care not to leak or disclose it to others or for personal gain, even after the end of duty with the Company.
7. To refrain from behaving in a way that damages the Company's reputation and to exercise caution in expressing opinions to outsiders on matters that may affect the Company's reputation and operations.
8. To refrain from using information obtained from the performance of duties in an improper way or disclosing such information to any person not involved, with the intent of receiving a reward.
9. To refrain from any actions conflicting with the interests of the Company, engaging in competition with the Company, or tarnishing the Company's reputation, even outside of



working hours, which may result in the Company losing benefits or customers misunderstanding.

10. To refrain from receiving property or demanding benefits from others related to the Company, except on specific occasions or festivals, and at an appropriate value.
11. To always be willing and united in developing themselves, their work, and the organization for efficiency and progress.

## **Recommendations and promotion of compliance with the Code of Conduct**

1. All directors, executives and employees at all levels must understand the essence of the Code of Conduct and strictly adhere to it as a guideline.
2. All supervisors at all levels must be leaders and role models in compliance with the principles of the Code of Conduct. They should provide knowledge and encourage subordinates, as well as employees at all levels, including stakeholders related to the Company, to understand that compliance with the principles of this Code of Conduct is correct and should be strictly followed to avoid any impact on the Company and stakeholders.
3. Whenever in doubt or having inquiries, and upon observing any action that indicates or violates the Code of Conduct, consult or notify the supervisor/individual/function assigned by the Company through designated channels.
4. To cooperate and agree for the investigation of facts with the individual/function authorized by the Company to conduct the investigation.
5. To consistently review knowledge and understanding of the essence of the Code of Conduct.

## **2. Practices**

To provide clarity and convenience for directors, executives, and employees in performing their duties in accordance with the framework of laws and regulations and aligned with the principles of the Code of Conduct, Sammakorn has established a policy for directors, executives, and employees to adhere to. This ensures that operations are transparent, fair, clear, and verifiable. The details are as follows:

### **Organizational Management Policy**

#### **Anti-Corruption Policy**

The Board of Directors recognizes and emphasizes conducting business with honesty and integrity. They give serious importance to anti-corruption efforts by supporting the Company's participation in a Collective Action Coalition. This initiative encourages all directors, executives, employees, and stakeholders to collaborate in combating corruption across all sectors. Everyone, from directors to employees at all levels, is encouraged to refrain from giving or receiving bribes for business

benefits. Therefore, the Company has established the following guidelines to collectively prevent corruption, promote corporate governance, and foster cooperation and loyalty to the organization, ultimately benefiting all stakeholders.

- To refrain from demanding or agreeing to receive money, gifts, or entertainment, including all forms of bribes or any other benefits from those involved in business with the Company. Additionally, to abstain from giving bribes to government officials and stakeholders associated with the Company to induce them to act in a way that is contrary to the law.
- To perform duties with responsibility, overseeing the use of the Company's assets for the maximum benefit of the Company, and refraining from using them for personal gain or the benefit of others.
- To refrain from discriminating against customers.
- To refrain from having a vested interest in or personally involving in a transaction or activity. If such a case occurs, notify the Company for acknowledgment and withdraw from being a related person.
- To have a centralized agency responsible for monitoring and evaluating practices, and imposing penalties according to the regulations or other rules of the Company in the case of failing to comply with the specified policy and guidelines.

#### **Policy on giving or receiving gifts or any other benefits**

The Company has established policies and guidelines regarding giving or receiving gifts or any other benefits to benefit operations and build credibility for the Company. The guidelines are as follows:

- Giving gifts may be allowed according to tradition. The gift must not influence the recipient's business decisions and must be of reasonable value, not exceeding 3,000 baht, and must not be in cash.
- Giving or receiving gifts may be allowed if done with transparency and disclosed in a clear manner, free from any wrongdoing.

#### **Policy on Conflict-of-Interest Prevention**

The Board of Directors places importance on managing transactions that may involve conflicts of interest, improper connected transactions, or related party transactions. A policy has been established to ensure fair transactions, similar to those with the general public, in accordance with general competitive trading conditions, subject to approval from the Board of Directors. The guidelines are clear, meticulous, fair, and include complete and transparent data disclosure in accordance with the principles of corporate governance or the criteria set by the Company or related regulations. Directors and executives annually certify that they have taken no actions that would cause conflicts for the Company.

Any conflicts of interest must be reported for consideration. In cases involving related stakeholders, they must not attend the meeting; or if they do participate, they will abstain from voting, and such abstention will be recorded in the meeting minutes. Therefore, the guidelines are summarized as follows:

- To avoid any acts conflicting the interests of the Company
- If any transaction is necessary for the benefit of the Company, treat that transaction as if it were a transaction with a third party. Consideration and approval must be made by those who are not stakeholders in the respective transaction.
- To refrain from using the opportunity or the Company's data for personal gain, and to avoid conducting business that competes with the Company or conducting related business.

### **Policy on reporting the stake holding of directors and executives**

The Company has monitored and complied with laws, rules, and regulations related to methods for reporting stakeholding by directors, executives, and related individuals in accordance with Section 89/14 of the Securities and Exchange Act (No. 4) B.E. 2551 (A.D. 2008) and the Notification of the Capital Market Supervisory Board No. TorChor. 2/2009. This involves directors and executives reporting their own stakeholding or that of related individuals with interests connected to the management of the Company's or its subsidiaries' business.

To facilitate the Company's compliance with regulations pertaining to related transactions that may give rise to conflicts of interest and potentially result in the transfer of benefits from the Company and its subsidiaries, directors and executives are obligated to fulfill their fiduciary duties. This necessitates decision-making free from any direct or indirect interest in the matters under consideration. Directors and executives are required to complete and submit a form disclosing their personal stakeholding or that of related individuals. Additionally, they are expected to undertake the following actions:

- Initial report: submit report within 15 days from the date of appointment
- Report of changes in stakeholding-related data: Submit the report without delay within 3 working days from the date of changes in data, specifying the revision number of the changes

The Company Secretary is tasked with compiling reports on the stakeholding of directors and executives. A copy of these reports is to be submitted to the Chairman of the Board of Directors and the Chairman of the Audit Committee within 7 working days from the receiving date. These reports will be retained and disclosed in Form 56-1 (Annual Report).

In addition, for the Stakeholding Report section when considering agenda items, any stakeholder with vested interests must not attend the meeting. If they do attend, they must abstain from voting, and this abstention should be recorded in the meeting minutes.

### **Policy on disclosure and use of inside information**

The Company has a policy to disclose information and news about the Company to investors and individuals related to the Company, including all stakeholders, in a correct, adequate, appropriate, transparent, timely, and reliable manner. A designated function or individual responsible for investor relations is appointed, acting as a representative to provide information and communicate with investors and analysts. They also organize press conferences for the media and facilitate opportunities for them to meet with executives as appropriate. This function will disseminate information and news through various channels such as the Company's website, the Stock Exchange of Thailand, and other public relations media. Key data is regularly updated, and it is crucial for shareholders, investors, and all stakeholders to keep abreast of these updates. The guidelines are outlined as follows:

- To distribute a circular letter to employees at all levels for their acknowledgment, emphasizing that directors, executives, and employees who are related to or have access to inside information of the Company must maintain the confidentiality of such information. It is strictly forbidden for them to utilize inside information related to the Company for personal gain. Additionally, they are prohibited from trading securities, particularly within 1 month before the public release of financial statements, as this could impact changes in the trading prices of securities.
- The Company has disclosed essential information in both Thai and English languages by posting it on the Company's website and other media channels. The information must always be kept up-to-date.
- Directors and senior executives, as defined by the SEC Office, are required to be responsible for preparing a report on the Company's securities trading. This report is presented at the Board of Directors' meeting for acknowledgment, with notification through the Company Secretary.
- Directors and senior executives, as defined by the SEC Office, are required to notify the Board of Directors or those assigned by the Board about the Company's securities trading at least 1 day prior to the trading.
- Directors and senior executives, as defined by the SEC Office, are notified to understand the obligations in reporting changes in securities holdings within the Company for themselves, their spouses, and minor children to the SEC Office, as stipulated in Section 59 of the Securities and Exchange Act B.E. 2535 (A.D. 1992). Penalties for non-compliance are in accordance with Section 275 of the Securities and Exchange Act B.E. 2535 (A.D. 1992). A copy of this report must be submitted to the Company on the same day as submitting a report to the SEC Office.

- To consider and determine penalties for executives and employees who use inside information for personal gain.
- If any action violates the above-mentioned regulations, the Company will deem it a disciplinary offense, applying appropriate punishment based on the specific case.
- Controls and measures are in place to prevent third parties from accessing the Company's inside information. Employee access to information at various levels is determined based on their authority, duties, and responsibilities.

#### **Policy on internal control, internal audit and financial reporting**

Sammakorn has assigned a function to audit the internal control, internal audit, and financial reporting systems, ensuring confidence among all stakeholders that the Company complies with relevant standards and laws. The guidelines are outlined as follows:

- An efficient internal control system and a conducive environment are established for the organization under the audit of internal auditors and the review of the Audit Committee. The Company implements risk management measures to control management operations, as well as information and data communication systems.
- The Company's management is responsible for preparing accurate, complete, and timely financial reports, both for annual and quarterly financial statements. These reports are prepared in accordance with appropriate accounting policies to comply with financial reporting standards and related regulations.
- All employees of the Company contribute by providing information and supporting the work of the internal audit unit and the financial auditor. They are required to report any errors or abnormalities immediately when discovered.

#### **Policy on security for the use of information technology system**

Sammakorn has established a policy for the use of a modern, standardized, and secure information technology system. This policy serves as the basis and guideline for the operations of all executives and employees. The following guidelines are established to ensure efficient operation and compliance with relevant laws, rules, and regulations:

- Perform tasks in accordance with the Computer-Related Crime Act B.E. 2550 (A.D. 2007)
- Computers and information technology, including peripheral equipment used for Company-related tasks, are considered the property of the Company. All employees must take care of them and are not allowed to use them for personal gain.
- It is prohibited to change, duplicate, delete, or destroy any information of the company without permission.

- It is prohibited to disclose confidential information, system information, or any other Company-related information without permission.
- Any action disruptive to the Company's computer or internet systems is not allowed.
- Employees should carefully maintain and use their accounts. Co-use with others is prohibited, and it is also forbidden to share, publish, distribute, or disclose usernames and passwords to others.
- To use the internet for searching information and acquiring knowledge beneficial to work.
- To avoid visiting illegal websites and those that violate good morals, including those that may harm the Company's computer and information technology systems.
- Using the Company's email address for personal matters is forbidden. Additionally, forwarding emails with inappropriate or illegal content is prohibited. The Company's email address must be used exclusively for the benefit of the Company's business.
- Downloading any files or programs unrelated to work without passing through the Information Department is forbidden.
- Installing and using computer programs without passing through the Information Department are forbidden.
- Modifying, installing, or removing any hardware devices, in addition to the equipment installed by the Company, is forbidden.

**Policy on maintaining business secrets and protecting intellectual property**

Sammakorn conducts business and encourages employees to perform their duties in compliance with laws and regulations regarding intellectual property rights, including trademarks, patents, copyrights, trade secrets, and other areas as required by laws. This includes using licensed computer programs with inspection and installation by the Company's Information Department only. This is based on the policy regarding the Computer-Related Crime Act B.E. 2550 (A.D. 2007), and employees at all levels have been informed in writing. The guidelines are set out as follows:

- To refrain from encouraging employees to commit acts that infringe on the intellectual property or copyright of others without permission.
- To perform work using licensed computer programs, and the installation and use of computer programs without passing through the Information Department are forbidden.
- Compensation, rewards, or anything acquired from the creation of public relations media, printed media, including media or other materials released to the public, or works created by the assignment of the Company, are considered compensation for those works, and the copyright belongs to the Company.

### **Policy on maintaining and using the Company's assets**

Sammakorn encourages employees at all levels to use the Company's resources and assets wisely, maximizing their efficiency. The guidelines are set out as follows:

- All employees are responsible for preserving and maintaining the Company's assets to prevent damage or illegal loss.
- Campaign for using assets wisely, effectively with maximum benefit for the Company.
- The Company's assets are prohibited from being used for personal gain or any operations unrelated to the Company's work.
- The Company's inside information that has not yet been released to the public is prohibited for personal gain.

### **Policy on whistleblowing and complaints**

Sammakorn encourages employees to oversee the Company's operations and to blow the whistle or report any abnormalities, incorrect, or improper performances contrary to legal practices, rules, and regulations that may cause harm to the Company. All employees, stakeholders, or those associated with the Company can report or blow the whistle through channels designated by the Company. Informants will be protected to instill confidence among all stakeholders, employees, or whistleblowers, especially in cases where they are unfairly treated by the Company's actions, witness illegal or unethical conduct, or experience bullying, threats, disciplinary punishment, or discrimination through unfair employment practices. The guidelines are set out as follows:

- The Company has channels to get report from all stakeholders. Reports or complaints can be filed in cases that may cause damage to the Company, including instances where rights have been violated, through the Company's website at [www.sammakorn.co.th](http://www.sammakorn.co.th).
- If whistleblowers and complainants wish to report directly to the independent directors, they can do so by emailing all three independent directors at [Whistleblower@sammakorn.co.th](mailto:Whistleblower@sammakorn.co.th).
- Independent directors will always consider all obtained information first and then contact the informant directly.
- Independent directors will initially screen the information to determine its reliability. Subsequently, they will investigate and summarize the facts related to the received complaints, deciding on measures to prevent, improve, and take appropriate corrective action.
- The Company protects informants and keeps the complainant's information confidential, refraining from disclosing their name, address, or any other details that can identify the

complainant. However, if any event causes discomfort to the informants, they can request protection or fact-finding from an independent committee.

- Whistleblowers and complainants are expected to report accurate information. If, upon verification, the provided information is found to be false, it may cause harm to the Company and will be considered a violation of the Company's work regulations.
- The Company has appointed individuals or functions responsible for receiving whistleblowing and complaints as follows: an independent committee, direct executives, an ad hoc committee, and the Board of Directors or an authorized person.

### **Policy on environmental conservation**

The Company promotes education and cultivates awareness of environmental conservation among employees at all levels. It is also conscious of the potential impacts on nature. Internal guidelines have been established to demonstrate environmental responsibility as follows:

- To always educate employees about the value of natural resources.
- To support employee activities aimed at reducing the use of natural resources or using them for optimal benefit.
- To cultivate awareness among employees at all levels, encouraging them to be responsible for the environment.
- To promote awareness of the impacts that may occur if we do not contribute to the conservation of our limited natural resources.

### **Policy on safety, occupational health, and environment**

The Company is aware of the safety, occupational health, and working environment for employees at all levels. All employees must be safe, maintain good hygiene, work under optimal conditions, and be provided with effective tools, appliances, or work equipment that are ready for use and safe. The Company promotes knowledge and understanding in using tools for work or action. The guidelines are set out as follows:

- To strictly comply with laws, rules and regulations related to safety, occupational health and environment.
- To take care of and maintain a clean working environment with good hygiene and safety for the lives and properties of the Company's employees.
- To provide training and promote understanding of practices that need to be controlled and prevented, ensuring the avoidance of loss or damages resulting from accidents, fires, or work-related injuries. The Company also takes careful measures to protect its assets and prevent any loss or damage.



- To seriously and continuously focus on and give cooperation in social responsibility regarding safety, occupational health and environment. This includes the appreciation and best use of natural resources, realizing the importance of the environment and safety for relevant stakeholders in line with the principles of sustainable development.
- Employees at all levels should be aware and cooperate in all activities organized by the Company to enhance the quality of safety, occupational health and working environment.

### **Policy on respecting laws and principles of human rights**

The Company supports and respects the protection of human rights, refraining from conducting business operations that affect or cause any action harassing or against the principles of human rights, including refraining from engaging in forced child labor or employing illegal foreign workers. Sammakorn gives respect and treats all stakeholders with fairness based on human dignity and without discrimination, irrespective of birthplace, race, gender, age, skin color, religion, physical condition, or any other factor. The Company guarantees that employees at all levels will have the right to secure their personal data, work in a place that is hygienic, clean, safe, and free from harassment or any form of bullying. The guidelines are set out as follows:

- To strictly adhere to and consider the principles of human rights, and to be consistently aware of any necessary actions.
- To supervise and prevent the Company's business from being involved in any form of human rights violation, and to ensure that the Company refrains from supporting activities that violate laws and contravene the principles of human rights.
- To provide employees at all levels with knowledge and understanding of human rights principles to apply them as a foundation for their work.

### **Policy on employee behaving to other employees**

The Company has established a policy regarding employee behavior and interactions with colleagues. This policy aims to promote careful conduct and prevent actions that may violate rules or regulations, thereby avoiding any issues during their work within the organization. The guidelines are outlined as follows:

- To be considerate to colleagues and perform duties with determination, full capability, honesty, integrity and transparency.
- To exercise their right to express opinions politely, appropriately, and according to the occasion.
- To respect the rights of other employees at all levels.

- Supervisors should conduct themselves in a manner that earns the respect of employees, and employees should refrain from any behavior that is disrespectful to their superiors.
- Employees should adhere to discipline and conduct themselves in accordance with the organization's rules, regulations, and good traditions.
- To create and maintain a positive working atmosphere with unity among employees
- Employees should avoid any actions that may impact the Company's reputation and image or potentially cause problems for the Company.

### **Policy on exercising political rights**

Sammakorn encourages employees at all levels to exercise their rights as good citizens in accordance with the law. However, the Company does not have a policy to support or align with any political party. The Company maintains neutrality in politics. The guidelines are outlined as follows:

- To exercise rights as good citizens according to Constitutional Law and other related laws.
- To be entitled to participate in political activities on their own behalf, but such activities must occur outside of working hours. Participation in the name of the Company is forbidden.
- To refrain from using their authority to lead, direct, or force colleagues and subordinates to support any political activities, either directly or indirectly.
- To refrain from using the Company's resources or assets to support political activities

## **Stakeholders**

### **Policy on treatment and responsibilities for shareholders**

The Company is committed to operating its business to generate continuous returns for shareholders, with honesty and integrity. It pledges equal treatment to both major and minor shareholders. The guidelines are outlined as follows:

- To respect the rights of all major and minor shareholders and treat them equally without discrimination.
- To perform duties with honesty, integrity, and transparency, including exercising caution and care in actions for the best interests of shareholders.
- To disseminate news and information beneficial to shareholders via the Company's website at [www.sammakorn.co.th](http://www.sammakorn.co.th)
- To report financial status, performance, and additional information accurately, completely, sufficiently, and in a timely manner for shareholders' decision-making.

### **Policy on treatment and responsibilities for the government sector**

Sammakorn adheres to and ensures strict compliance with the spirit of the law, including general laws or specific laws related to the Company's business, such as real estate, etc.

In addition, the Company collaborates with government agencies to conduct activities that benefit society, communities, and the environment regularly. This is aimed at improving the quality of life for people in the communities where the Company operates projects or has offices for business operations. The Company also collaborates with other private sectors.

### **Policy on treatment and responsibilities for employees**

Sammakorn recognizes the significance of employees at all levels, considering them as valuable resources crucial to the Company. The Company values their honor and dignity, treating them with politeness, equality, and fairness without discrimination. Moreover, when hiring, appointing, and transferring employees, the Company considers fairness as a fundamental criterion. The guidelines are outlined as follows:

- To treat all employees with respect, honor, and dignity according to the principles of the human rights policy, without discrimination.
- To recruit and select all candidates for various positions with fairness, considering qualifications suitable for the roles based on their qualifications, experience, and other necessary requirements, without any restrictions such as gender, race, religion, etc.
- To determine fair remuneration for all employees and provide equitable compensation.
- To promote, transfer, and reward employees based on fairness, with knowledge, competency, and suitability as criteria. Any punishment will be in accordance with the rules set by the company or relevant laws.
- To regularly communicate the organization's guidelines and practical methods to employees, ensuring consistent standards throughout the organization under the framework of the Company's Code of Conduct.
- To emphasize the development of employees' knowledge and competencies, providing them with training and continuous development opportunities, enabling them to work more efficiently and acquire appropriate knowledge and skills for their job positions.
- To listen to employees' opinions and suggestions regarding questions and problems.
- To equally and equitably listen to complaints from employees at all levels, providing them with channels to report such matters to the Company, with the informant's data kept confidential
- To ensure compliance with the provisions of labor law, Thai labor standards, and other regulations related to labor, and to uphold the rights and benefits of employees according to labor laws.

- To take care of and encourage employees to have a good quality of life at work, ensuring a safe environment for life and property, and maintaining good hygiene in the workplace.
- To fairly evaluate the performance of all employees based on their competencies and job performance.

### **Policy on treatment and responsibilities for business partners**

The Company aims to provide products and services and select business partners with standards of fairness, transparency, and equality, regardless of scale—be it small or large—while considering the maximum benefits for the Company. The Company also ensures fair compensation for both itself and its business partners. The Company is committed to developing and maintaining sustainable relationships with business partners and contractual parties. Therefore, the guidelines have been established as follows:

- To strictly adhere to the terms of trade contracts with business partners, ensuring fairness and mutual benefits to both parties.
- To establish standards and criteria for selecting business partners and procuring materials in business operations, considering the best interests of the Company and fairness for business partners.
- To refrain from disclosing data regarding the secrets and benefits of business partners to other business partners, preventing them from reducing prices or eliminating opportunities to offer commercial services.
- To build good relationships with business partners, considering long-term mutual benefits.
- If there are cases that cause problems, promptly notify and disclose them to business partners, working together to solve problems fairly and quickly.
- To refrain from demanding or receiving any dishonest benefits from business partners.

### **Policy on treatment and responsibilities for customers**

The Company prioritizes customer satisfaction and needs, striving to provide fair services to achieve the highest level of customer satisfaction and build strong relationships. Customers play a crucial role in the Company's success in its business operations. The guidelines are outlined as follows:

- To ensure polite treatment of customers, establish credibility and foster trust with them.
- To treat customers equally and fairly, without discrimination regardless of scale—whether small or large.
- To refrain from demanding or receive any benefits from customers.
- To provide customers with advice on selecting and purchasing the Company's products and services effectively, ensuring the highest level of satisfaction.

- To provide customers with sufficient and accurate information, both verbally and in writing, ensuring their correct acknowledgment and understanding of the Company's products and services. This includes details such as duration, conditions, promotions, rights, and obligations, without exaggeration that may lead to customer misunderstanding about the quality, quantity, or any conditions. However, if it is found that the customer has misunderstood, promptly explain the correct information to them.
- To establish an after-sales service unit to maintain a positive environment in the project and provide repairs for customers' homes during the warranty period.
- To maintain customer confidentiality and refrain from disclosing customer information or using it for personal gain or the gain of those not involved.
- To establish a system and channel for customers to lodge complaints about the quality of products and services, and to respond to complaints, suggestions, and resolve problems for customers quickly and efficiently.

#### **Policy on treatment and responsibilities for creditors**

The Company has established a policy regarding fair treatment and responsibilities for creditors. This policy focuses on all categories of creditors based on existing conditions and aims to strictly comply with agreements or contracts, ensuring fair treatment for both parties. The Company takes into account its highest interests based on fairness and avoids actions that may cause conflicts of interest. The guidelines are outlined as follows:

- To strictly comply with contracts, agreements, or conditions with creditors.
- To utilize loans according to the intended purpose as stated in the intention and notified in the contract or agreement with creditors or financial institutions providing the loans.
- To instill confidence among creditors, ensuring their trust in the Company's financial status and its ability to repay debts.
- To fully disclose information to creditors without distorting facts or amending any documents for one's own benefit.
- To repay debts to creditors according to the agreed-upon conditions and on time.
- When any important or significant event occurs that may affect the financial status, impacting debt repayment with creditors, promptly notify creditors or financial institutions providing the loans. Collaborate to seek ways to prevent or resolve problems, minimizing damage or impact. Consider the highest interests of the Company and fairness to both parties.
- To develop and maintain good and sustainable relationships with creditors.

### **Policy on treatment and responsibilities for competitors**

The Company aims to operate its business to achieve sustainable success and long-term survival with morality and ethics. Therefore, a policy has been established to treat business competitors within the legal framework regarding the principles of trade competition and to avoid the infringement or acquisition of competitors' trade secrets through any means that are dishonest, illegal, or unethical. The guidelines are outlined as follows:

- To behave within the framework of good competition rules.
- To refrain from seeking competitors' confidential information by dishonest or inappropriate means to acquire competitors' trade information.
- To refrain from destroying the reputation of competitors with malicious and baseless accusations.
- To refrain from creating false news that may cause misunderstandings through allusions and comparisons, or launching attacks by means that are morally degrading, leading to damage to competitors.
- To promote free and fair trade competition without trade monopolies.

### **Policy on treatment and responsibilities for society and community**

Sammakorn is committed to developing the organization for sustainable growth under corporate governance. We aim to act as a responsible part of society, contributing to the development of communities for a good quality of life. This commitment enables the Company to operate sustainably in tandem with the development of communities and society. The guidelines are outlined as follows:

- To establish a Sustainability Policy that takes into account the economic, environmental, and social dimensions, providing all employees with guidelines for aligning their practices in the same direction.
- To conduct any business or activity of the Company with care and responsibility, minimizing impact on communities and society, and considering the quality of life of people in that area.
- To respect the customs, traditions and culture of each locality where the Company has entered into business development operations.
- To continuously foster an understanding of community and social responsibility among employees at all levels.
- To consistently organize activities to promote and develop communities and society, and collaborate with the government sector or other related agencies to provide tangible benefits for communities and society.

### **Policy on treatment and responsibilities for environment**

The Company is dedicated to conducting its business with a long-term perspective, focusing on responsibility and awareness of potential environmental impacts. Strict attention is given to environmental considerations. The guidelines are outlined as follows:

- To consistently cultivate a sense of social responsibility and environmental awareness in employees at all levels, enabling them to understand how to care for nature and the environment.
- To select and utilize resources as necessary.
- To prevent accidents, control operations, and regulate the release of waste to ensure they stay within standard values and comply with laws.
- To develop guidelines for the proper management of waste materials in accordance with academic principles, ensuring the mitigation of potential environmental impacts.
- To adhere strictly to environmental laws and regulations.
- To organize activities to co-create society, communities, and the environment by providing assistance and support to individuals or organizations in solving problems and fostering the development of society and the environment.
- In housing development projects, the Company incorporates green spaces in compliance with the law.

### **3. Monitoring to ensure the compliance**

1. The Company has determined that the Board of Directors, executives, and employees at all levels are responsible for acknowledging, understanding, and strictly complying with the policies and practices set forth in this Code of Conduct.
2. Executives at all levels must assume responsibility and consider it crucial to ensure that employees under their supervision are aware, understand, and adhere to the Code of Conduct.
3. The Company's regulations determine appropriate disciplinary measures in case of violations. The Company regularly organizes training sessions and monitors compliance with the policy. It also praises and rewards those who perform well to encourage a commitment to adherence.
4. The Company has established various channels for inquiries and reporting complaints. In the event that employees or stakeholders have questions or wish to report a violation of the Code of Conduct, they can use channels such as reporting to the employee's trusted supervisor in the hierarchy, the Audit Committee, a central email for receiving complaints, and the Company's website.

## Reviews

Sammakorn has established a periodic review of the Code of Conduct, occurring at least every year or every two years in the event of any significant changes. This is undertaken to further enhance policies and guidelines, ensuring consistency with regulators and appropriateness for evolving circumstances, changes in the business environment, and compliance with applicable laws.

## Guidelines for dealing with problems and complaints

The Board of Directors has provided all stakeholders with channels to contact or lodge complaints regarding matters that may cause damage to the Company or the Board of Directors. Anyone wishing to blow the whistle in cases of unfair treatment by the Company, or having suggestions or concerns about being affected by the Company's business operations, or by the performance of duties of the Company's executives and employees, can use these channels.

If any employees or stakeholders witness actions suspected of violating rights or failing to comply with the Code of Conduct, laws, rules, and regulations of the Company, as mentioned above, they can ask questions, lodge complaints, or notify the responsible person by reporting to the Chairman of the Board, directors, the Audit Committee, or through the Internal Audit Department. This allows for the verification of data, investigation of facts, and implementation of punishment according to the process set by the Company.

All stakeholders can choose to blow the whistle or lodge complaints using the following details:

- Notice to the Audit Committee
  - Address : 188 Spring Tower, 21<sup>st</sup> Floor, Phaya Thai Road, Thung Phaya Thai Sub-district, Ratchathewi District, Bangkok Metropolis 10400
  - Telephone : 02 106 8300
  - Email : [whistleblower@sammakorn.co.th](mailto:whistleblower@sammakorn.co.th)
- Notice through the Company's Website at [www.sammakorn.co.th](http://www.sammakorn.co.th) click 'Other Sections', then fill in the form.
- Notify your trusted supervisors in the hierarchy

## Penalties

Directors, executives, and employees at all levels, including employees in subsidiaries, are responsible for adhering to and strictly following the Code of Conduct. Any person violating or failing to comply will be subject to disciplinary action according to the regulations of the Personnel and Corporate Culture Department.



**4. Disclosure of the Code of Conduct**

Sammakorn has published the full version of the Code of Conduct on its website, available at [www.sammakorn.co.th](http://www.sammakorn.co.th), and it is disclosed in both Thai and English in the Annual Report/Form 56-1 One Report.

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Note: The revision of this Code of Conduct has been considered and approved by the Board of Directors at meeting No. 1/2024 on 20 February 2024.

## **Acknowledgement and Consent Form**

I have been made aware of this Code of Conduct. I agree to study and accept the guidelines, committing to strictly adhering to this Code of Conduct as a guiding principle in my operations.

Signed .....

(.....)

Position.....

Date..... Month..... Year.....