

## **TSFC Securities Public Company Limited.**

### **Business Ethics Policy**

---

TSFC Securities Public Company Limited. aspires to operate its business according to the highest standards of best practices. The company is committed to ensuring that its employees adhere to the principles of business ethics, including compliance with laws and good moral values that benefit society. By doing so, the company aims to achieve sustainable growth amidst the changing business landscape.

Employees at all levels have the responsibility to be aware of, read, understand, and genuinely embrace the business ethics guidelines. They are expected to diligently follow these guidelines as a framework for their work. The content of this business ethics policy encompasses the actions of employees and their relationships with external individuals.

#### **1. The announcement of the implementation of the business ethics policy**

The Business Ethics Policy version was announced on 16 May 2014, of TSFC Securities Public Company Limited. is hereby cancelled. This cancellation shall not affect the validity of any activities that have been carried out in accordance with the previous version of the Business Ethics Policy announced on 16 May 2014. This Business Ethics Policy has undergone a review and has been officially implemented as of 25 August 2022. Employees who were employed prior to the date of this Business Ethics Policy shall be required to comply with and adhere to this Business Ethics Policy, effective from the date of its announcement onwards.

#### **2. Definitions**

The term "**employees**" refers to all levels of staff within TSFC Securities Public Company Limited.

The term "**company**" refers to Securities for TSFC Securities Public Company Limited.

#### **3. Conducting business with honesty, integrity, and fairness to maintain the reputation, credibility, and trustworthiness of the company as well as the capital market.**

The company's reputation in terms of business integrity is considered the most valuable asset. Employees have a responsibility to maintain this reputation by fulfilling their duties with honesty and integrity as their fundamental principles. This will contribute to the trust and maximum benefits for customers. Employees should not misuse any important information of customers or the company for personal gain.

#### **4. Comply with laws, regulations, and relevant rules, as well as adherence to customs, traditions, and good moral values**

Any actions taken by employees (both in their personal capacity and on behalf of the company) and the company itself must be within the framework of the law, regulations, and other applicable requirements. This includes compliance with national laws, rules, regulations, as well as professional codes of conduct set

forth by government agencies. Employees must not participate in or engage in any activities that violate or contravene any laws or regulations.

If an employee becomes aware of suspicious behavior or actions by individuals responsible for the company's operations that may be in violation of laws, regulations, cultural practices, or ethical standards, the employee should provide truthful information regarding the observed incidents to ensure that the relevant departments or supervisory authorities are informed in a timely manner.

#### **5. The use of intellectual property and technology**

Intellectual property and technology are crucial factors that contribute to the success and efficiency of business operations. It is the responsibility of employees to take care of the company's intellectual property and technology assets and prevent their loss, damage, or unauthorized use. Employees must handle intellectual property and technology assets with caution and comply with applicable laws and contractual obligations. They should use these assets responsibly, ensuring that they are not misused or used in an unethical manner. Furthermore, employees must respect the rights of intellectual property and refrain from using technology assets owned by others without proper authorization.

#### **6. Effective and Accurate Documentation and Reporting Practices**

All relevant information pertaining to employees' job duties in each area must be accurately collected and documented. Key information should be complete and readily accessible for use at any time.

#### **7. Provision of Accurate Information**

Employees are responsible for providing information to customers and other individuals related to the company, whether in the form of documents or verbal communication on behalf of the company. It is imperative that employees provide accurate, clear, and relevant information that reflects the truth.

#### **8. Maintaining Customer Confidentiality**

All information related to customers should be limited to employees who have a direct involvement. It should be carefully considered and treated as highly confidential, and must not be disclosed without permission from the customer or authorized individuals. In cases where customer information needs to be shared with external parties, employees should consult their superiors, legal departments, and regulatory agencies to ensure compliance with regulations and laws.

#### **9. Adequate Customer Data Management**

Employees have a responsibility to collect and maintain customer data in a thorough and complete manner to ensure confidence that such information can be used for accurate analysis and decision-making in line with the company's business operations.

#### **10. Customer Asset Management**

The trust that customers place in the company is a valuable asset that employees must collectively safeguard. The assets of customers must be clearly distinguished from the assets of employees or the company, both in terms of accounting and storage. Employees responsible for customer asset care and protection must demonstrate honesty, integrity, and consistent vigilance.

### **11. Conflict of Interest Mitigation**

The company, customer benefits, and personal benefits must prioritize in a way that puts the interests of customers and the company ahead of personal gains. Employees must fulfill their duties impartially, free from biases that may arise from conflicts between their own benefits and those of customers and/or the company. Employees should conduct themselves in a manner that ensures no conflicts or even the appearance of conflicts between their personal interests and their responsibilities towards the company or its customers. Employees must avoid any actions that may result in conflicting interests and adhere to the following guidelines.

- Employees shall not accept any compensation from customers that is derived from their regular job responsibilities.
- Employees shall not seek personal benefits by burdening customers with expenses.
- Employees shall not use information obtained from their job duties to seek personal gains.
- Employees shall disclose any significant interests they or their families have as owners or stakeholders in the benefits of customers or competitors of the company.
- Other provisions as determined by the company and/or Securities and Exchange Commission (SEC).

If there is any suspicion that such actions may result in conflicts of interest, it is advised to seek direct feedback from supervisors or internal monitoring and auditing departments.

### **12. Professional Work Performance through Skills, Knowledge, Abilities, and Professionalism**

Employees are expected to make continuous efforts to maintain professional standards of knowledge and skills in their work performance. They are responsible for understanding various factors that impact their job responsibilities, in order to uphold their level of competence and ensure the benefits of the company's clients. This includes delivering high-quality services and treating clients fairly and ethically.

### **13. Social, Community, and Environmental Responsibility**

The company recognizes the importance of creating sustainable value for its business and has integrated social, community, and environmental issues into its management practices. It supports employees in valuing and promoting environmental stewardship, respecting local customs and traditions in the company's locations, as well as contributing to philanthropic activities, community development, and responsible environmental practices as deemed appropriate. Furthermore, the company actively participates in improving the quality of life for its employees and the surrounding community.

### **14. Respect for Human Rights**

The company is committed to creating and maintaining an organizational culture that upholds the respect for human rights. It supports and promotes actions to protect human rights by treating everyone with dignity and equality, regardless of gender, race, religion, language, age, skin color, education, social status, or any other differentiating factor.

### **15. Compliance and Commitment to Anti-Corruption Policy**

The company is dedicated to adhering to the anti-corruption policy and establishes that all employees will not tolerate any form of corruption for the benefit of the company, themselves, their families, relatives, friends, or acquaintances. This includes demanding or accepting bribes in any direct or indirect form. The company is steadfast in creating and maintaining an organizational culture that strongly opposes corruption. Employees are expected to demonstrate honesty and serve as role models in their conduct, including subsidiaries, affiliates, or related companies. They are also encouraged to participate in anti-corruption measures related to the company's business partners.

### **16. Internal Control and Collaboration with Regulatory Authorities**

All employees must understand and recognize the importance of internal control in all aspects of the company's activities. Employees are encouraged to actively participate in the development of work standards and contribute to the enhancement of appropriate internal control measures. This includes continuously improving their knowledge and understanding of their job responsibilities and promptly addressing any identified deficiencies by notifying the relevant departments. This collaborative effort aims to prevent harm to themselves, their departments, and the company as a whole.

Employees are expected to cooperate with regulatory authorities, both internal units within the company and government agencies, in disclosing information as required by law.

Announcement as of 25 August 2022

(Mr. Udomkarn Udomsab)

Managing Director