

CODE OF CONDUCT

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1. Business conduct principles

Siamgas and Petrochemicals PCL. ("the Company") intends that each employee recognizes and adheres to the standards set forth in the "Siamgas and Petrochemicals PCL. code of conduct book", which are consistent with the vision, purpose, and core values of the company. For it to be a clear policy.

Vision

Siamgas Group determines to be the world leader in energy business.

Mission

The Company has advantages and readiness to support business expansion, for instance, the growth of the market and gas floating price in the market. Regarding to creating of business competitive edge, the Company has developed potentials of upstream business and built effective products and services distribution networks with nationwide coverage and expanded business to the neighboring countries. For such development, the Company puts emphasis on the followings:

- Plan to increase facilities such as depot, terminal, filling plant, and gas stations as well as efficient logistics that cover all service areas.
- To continuously develop human resources for higher operational capability, effectiveness, and security.
- To place importance on policy regarding product security, service, and practices within the organization.
- To focus on well-being standard of people by providing premium products and services, especially security and convenience aspects, within a budget and a fair price.
- To emphasize environmental preservation, ethical business conduct, and responsibility towards society, shareholders, and other related parties.

8 Corporate Values

Management and employees have business ethics by adhering to the following guidelines for working as representatives of the company:

1. "Integrity" is honesty in the face of responsibility

Performing one's work with integrity and without corruption. Directly or indirectly

2. "Accountability" is responsibility for the fulfilment of duties

Accountability for performance obligations (positive or negative) after a decision has been made; mistakes are allowed but must be corrected. Because people are fallible.

3. "Morality" with morality and virtue

Using morality as a guide for life and business, working within morals and ethics in an acceptable manner

4. "Rule of law" conducting business in strict accordance with the law

Managers and employees must have a basic understanding of business-related legislation and comply with all applicable laws and regulations.

5. "Efficiency" is the efficiency and productivity at work

Focus on talents, knowledge, skills and openness to new things and new perspectives in order to gain expertise and profound knowledge and to successfully impart knowledge to others and bring out the best in oneself without being discouraged and afraid of hurdles. This is to increase the efficiency of teamwork to be standardized and have a system for optimal efficiency and generate a competitive advantage for the organization.

6. "Awareness" means having prudence and being careful

Prudence is necessary to consider the problem carefully. Planning to minimize errors and working with caution, understanding and a willingness to perform their duties effectively for themselves, the organization and those involved.

7. "Disclosure" means transparency and openness

To perform tasks with honesty, openness, and transparency and to make decisions and fulfil tasks in a way that is visible to the public. In addition to compliance with guidelines and resistance to corruption, compliance with regulatory and legal standards can also be assessed.

8. "Yield" focuses on performance and revenue

Operations to achieve objectives by measuring and evaluating results to emphasize that results are evident and to place a premium on achievement.

2. Anti-Corruption Policy

Siamgas and Petrochemicals PCL. (the "Company") has the ideology of conducting business ethically. The Company assumes social responsibility for all stakeholder groups in accordance with the principles of good corporate governance. In 2015, the Company participated in "Thailand's Private Sector Anti-Corruption Coalition" to express its intention to oppose all forms of corruption and to ensure that decisions and business activities that may involve corruption risks are scrutinized and addressed. The Board of Directors has therefore adopted the "Anti-Corruption Policy and Guidelines", which are intended to serve as a guide for conducting business and developing the company into a sustainable organization.

Anti-corruption policy

The Company has a policy that prohibits directors, officers, consultants, and employees of the Company from soliciting, offering, or accepting corruption in any form, either directly or indirectly. For the benefit of oneself, family, friends, acquaintances, or business interests this applies to all related departments. The company has established and regularly reviews anti-corruption policies. In order to be consistent with business changes, laws, policies, regulations, announcements, and rules and to protect the company's reputation, directors, officers, consultants, and all employees are committed to creating an organizational culture in which corruption is considered unacceptable and is practiced. Transactions with the government and government personnel. In addition, directors, officers, consultants, and employees at all levels must strictly adhere to the anti-corruption policy and guidelines. They must not be involved in any form of corruption, either directly or indirectly. This includes recognizing the importance of disseminating knowledge and understanding of anti-corruption policies and practices and discussing legal issues with others who have responsibilities related to the company and the company's stakeholders.

Definition

Company	Siamgas and Petrochemicals Public Company Limited
Company Director	Director, Siamgas and Petrochemicals Public Company Limited
Executive	Managing Director or the first four management positions after the managing director and all persons holding positions equivalent to those of the fourth management level, including those holding management positions in the accounting or finance department at the level of department head or higher or equivalent
Employees	Department managers, department heads, and employees of Siamgas and Petrochemicals Public Company Limited
Associate	Spouse, children, parents, siblings, uncles, aunts, cousins, or persons related by blood or registered by law, including friends and acquaintances
Business associate	Refers to brokers, agents, counterparties, intermediaries who do business with the Company.
Corruption	The use of positions/authorities/charges acquired, the use of existing property and the use of information obtained in the performance of the Company's work for wrongful acts against government officials, government agencies, private agencies or persons having duties, whether directly or indirectly for one's own benefit or for the benefit of other parties or to harm the interests of others, such as bribery, political support, charitable donations, sponsorship, gifts, entertainment and hospitality and other expenses, etc.
Bribery	The direct or indirect offering, contracting, or giving, including soliciting, or receiving, of anything of value in order to obtain business or to retain or recommend business for a particular company or to obtain any other advantage. Not suitable for business ethics.
Giving or receiving gifts	Give or receive something of value given by a person or company. A person/company without direct consideration. The gift can be an object or it can be in the form of other benefits.

Hospitality	Spending for business entertainment such as food and beverage entertainment and other expenses that are directly related to business practices or trade customs.
Hospitality welcoming	Participate in a social or cultural event with a public official or a person who has or may have a business relationship with the company or who may facilitate such a relationship.
Giving and receiving support	Giving/receiving money paid for the purpose of the business, brand, or reputation of the company. The risk is that it is a payment for a service or benefit that is difficult to measure and track.
Items or any other beneficial	Money, assets, or any other reward offered as a sign of good will or the granting of privileges as affection, relief, or as a favor, which are not a regular right to an ordinary person, or of discounts or entertainment privileges, as well as the giving of money for the cost of travel or transportation, lodging, food, or other things of an indifferent nature. Such as tickets or other things like credit cards or other receipts for advance payments or refunds, business offers, employment, etc.
Conventionality	Holiday or a significant day on which a gift can be presented, as well as an occasion to express congratulations. Expressions of gratitude, hospitality, condolences or help in accordance with social norms.
Political assistance	The use of funds, assets, resources, and time by the organization any supporting tools, equipment, communication channels or services of the corporation to make political contributions or to support a political party, politician, or candidate.
Charity donation	The voluntary giving/receiving of resources such as time, money, property, or labor to an organization or individual. The support of philanthropic initiatives such as religion, education, charity, etc. without expectation of financial gain.
Conflict of interest	Conflict between personal interest and public interest. Situation or Actions of persons, whether politicians, civil servants, government officials or executives, that prioritize personal interests over public interests to the point that they affect decision-making or the

performance of duties in the position for which that person is responsible. and affect the benefit of the public

Facilitation payment

Costs incurred by government personnel. Informal to expedite or minimize the process. The approach requires no discretion on the part of government officials. In addition, this approach is consistent with the duty of government officials.

Revolving Door

Hiring a former or current government official, legislator, or advisor to a government agency. It is prohibited to work for the Company relying on relationships or inside information to benefit the Company or to create conflicts of interest in the performance of duties. Government officials can seek improper business advantages or take political action for the benefit of the company.

Duties and responsibilities of the Board of directors, managers, and employees

1. The Board of Directors has the following duties and responsibilities:

- 1.1 Definition and approval of anti-corruption measures and practices
- 1.2 Oversee and support the fight against corruption by promoting anti-corruption policies and practices. to sensitize all employees of the company to the importance of fighting corruption and to comply with it.

2. The Committee for Good Corporate Governance has the following duties and responsibilities:

- 2.1 Assessing the appropriateness and sufficiency and reviewing anti-corruption policies and practices.
- 2.2 Providing advice, guidance and suggestions that are useful to the Board and management to develop good corporate governance.

3. The Audit Committee has the following duties and responsibilities:

- 3.1 Monitoring compliance with anti-corruption policies and practices to ensure that the company conducts its business transparently and does not fall foul of these policies.
- 3.2 Review of the audit report on the internal audit department's anti-corruption policies and practices.

4. The Executive Committee has the following duties and responsibilities:

- 4.1 Promote and support anti-corruption policies and practices

- 4.2 Review the adequacy of anti-corruption policies and practices to ensure that they are consistent with changes in business operations, policies, rules, announcements, regulations, and legal requirements.
5. **The Risk Management Committee** has the following duties and responsibilities:
 - 5.1 Consider the organization's corruption risks.
 - 5.2 Review the adequacy of anti-corruption practices in accordance with the changes in business, policies, regulations, announcements, rules and legal requirements
 6. **The Internal Audit department** has the following duties and responsibilities:
 - 6.1 Investigate and review operations in the various departments for compliance with the anti-corruption policy and guidelines
 - 6.2 Submission of an audit report to the Audit Committee.
 7. **The Human Resources department** has the following duties and responsibilities:
 - 7.1 Thorough communication of anti-corruption policies and practices to relevant stakeholders.
 - 7.2 Training to provide knowledge and understanding, advice and response to queries on compliance and anti-corruption practices for employees and associated persons.
 - 7.3 Track and store policy confirmation or compliance documents, including reports related to anti-corruption policies and practices signed by Company employees
 8. **Managers and employees** have the following duties and responsibilities
 - 8.1 Compliance with anti-corruption policies and practices not be involved in corruption in any case were directly or indirectly.
 - 8.2 Cooperation in providing information and facts to those charged by the Company with carrying out audits and reviewing the performance of the various departments

3. Anti-Corruption Practices

3.1 Bribery and Corruption

The Company is responsible for complying with the laws and anti-corruption policies of the country, including the laws of other countries in which the Company does business. In addition, the Company supports anti-corruption activities. Therefore, the guidelines on bribery and corruption are as follows:

- (1) Not to make promises or engage in bribery or corruption, regardless of whether the act is undertaken to benefit oneself or those involved, to obtain improper business advantages or to influence improper business decisions. This measure applies to all transactions with the government, the private sector, and state-owned enterprises.
- (2) Do not offer government officials money, items, or other rewards to facilitate or expedite procedures, to provide faster services, or to shift the action from the wrong to the right, which is an improper use of authority.
- (3) Avoid and do not promote business or transactions with individuals or organizations involved in corruption or corrupt activities, such as those that have been accused or identified by a government agency. Government agencies with oversight responsibilities and powers
- (4) In certain circumstances, the corporation may employ government officials to perform work or take actions that serve legitimate commercial interests and are not inconsistent with the official's duties, such as hiring a police officer to provide security, etc.

3.2 Gift and Hospitality

Hospitality is anything of value that a company receives or provides to individuals with a business relationship to promote goodwill or relationships at a reasonable cost and in accordance with custom and applicable regulations. To ensure that the giving or receiving of entertainment or hospitality gifts to public or private individuals or companies is lawful, it must be proper, transparent, and free from bribery and personal relationships that lead to cooperation with the company or the pursuit of future business benefits or anything else that could be labelled as corruption. Therefore, the Company has implemented internal control standards to prevent

corruption in high-risk situations involving the offering or acceptance of gifts. The hospitality and entertainment services are listed below.

1. The Company has a policy prohibiting employees from accepting or providing gifts, hospitality, entertainment, and other related expenses, including favors of any kind, to government officials or persons with business relationships with the Company for the purpose of obtaining business or inducing government officials to take unlawful actions. Duties for the benefit of the Company or to influence the Company's business.
2. The giving or receiving of gifts and other benefits is only permitted if they are in accordance with the Code of Conduct and tradition. They may give gifts to each other in accordance with the Company's customary etiquette and must act on appropriate occasions, but must not interfere with the Company's operations and business decisions, without any demand or request, without expecting any benefit or other consideration in return, and must ensure that the gift does not lead to a conflict of interest or corruption.
3. The giving or receiving of gifts, hospitality and hospitality must comply with the applicable laws, customs, policies, rules, regulations, and manuals.
4. The giving or receiving of gifts, hospitality and hospitality may only act on behalf of the company.
5. Giving or receiving gifts Entertainment and hospitality they must be appropriate and always approved by the authorized person.

Gift patterns and business hospitality that can be given or received are as follows:

- Ordinary objects of low value such as pens, notebooks, diaries, calendars, glasses, umbrellas, etc.
- Products used for the Group's public relations (corporate logo / corporate brand)
- Royal Project products Royal Project Community products in the company's field of activity or products for charitable purposes
- Gifts or baskets for various celebrations and special occasions
- Business hospitality as a meal for business meetings

Employees must follow the procedures for giving or receiving gifts. Entertainment and hospitality as follow:

1. Receiving of gifts

1.1 In the case of a recipient whose position ranges from employee level to department head or equivalent and who receives gifts worth no more than 3,000 baht (three thousand baht) each, proceed as follows:

- When receiving a gift, the employee receiving the gift must report it to the supervisor rank from the department manager or higher, always acknowledged in writing.
- Supervisors with the position of head of department or higher evaluate the gifts received regarding the achievement of objectives. Acceptance of gifts is appropriate under the criteria for giving or receiving gifts and company entertainment Given that employees can donate or use gifts to Human Resources.
- When giving a contribution to the Human Resources department, you should note the following: Employees who receive gifts must submit a gift report indicating the name of the recipient (employee), the contents and value of the gift, the date of receipt, and the name of the donor for his or her relationship to the company: 1. A supervisor with the position of Department Manager or higher submits a gift receipt report form to the Human Resources Department.

2. The Human Resources Department prepares a summary report on the receipt of gifts to the Managing Director.

1.2 In the case of a recipient who holds a position from employee level to deputy general manager or equivalent, those who receive gifts worth more than 3,000 baht (three thousand baht) must fulfil the following conditions:

- Employees who receive presents must complete a gift report form. By including the name of the recipient (employee), the nature and value of the present, the date of receipt, and the donor's identity and relationship to the business. in addition to the reason for contributing Nominate a supervisor with a division manager or higher post.
- Supervisors with a position of department manager or higher must review the Gift Receipt Report Form and the gifts received. Ensure that the purpose of the gifts received is consistent with the Gift Giving for Receiving Policy. Entertainment and Hospitality Consider signing the report and proceed as follows:

1. Supervisor with a position of Department Manager or higher sends a gift received along with a Gift Receipt Report Form to Human Resources.
2. Human resources department prepares a summary report on the receipt of gifts, which is submitted to the managing director.
3. The Internal Audit department analyzes the procedure for accepting gifts on an annual basis. This is to ensure that the procedure for accepting gifts is efficient and effective and is subject to appropriate internal controls.

2. Give entertainment and hospitality

- When distributing gifts or providing hospitality to business partners, the applicant shall submit a memorandum containing the name of the entity to be gifted, details, quantity and value of the gift or hospitality, and the purpose of the gift or hospitality, together with all supporting documents, to the authorized person for approval in accordance with the licensing authority.

Approval Limit	Authorized person
No more than 3,000 baht (three thousand baht)	Department Manager to Deputy Managing Director
More than 3,000 baht (three thousand baht)	Managing Director and above

- Authorized person to review the memorandum and supporting documents to ensure that the purpose of the gift entertainment is consistent with the company's business operations. and approve
- Applicant brings receipts for the provision of gifts or entertainment, such as thank you letters from the recipient of the gift or entertainment or photos of the provision, business cards, etc., to be sent to Financial Accounting for use in withdrawals and as evidence.
- The financial accounting department checks the receipts for the granting of gifts or hospitality, including the signature of the authorized person, before making the payment to the applicant and saves the data in the document files. The person making the request asks for additional information or clarification. If it is established that the provision of a gift of entertainment and hospitality is not in accordance with Company policy or is being used as a pretext or avenue for corruption. The Company will penalize offenders in accordance with the rules established by the Company.

- The Internal Audit Department examines the procedure for awarding gifts. Entertainment or hospitality services are provided annually to facilitate the gifting process. Internal controls are efficient, effective, and adequate with respect to entertainment.

3.3 Political Contributions

Political contributions refer to the provision of money, property, goods, rights, and other benefits or financial support, such as lending money, donating money, providing services, advertising in support of political parties' aid or support or other benefit to political parties, politicians, or persons with political functions, as well as political activities, whether direct or indirect

The Company operates with integrity, transparency, and political neutrality. In the course of the Company's business, there is a possibility of contact with government officials, politicians or related persons. Therefore, the company pursues a policy of maintaining political neutrality by not acting in favor of any political party and not supporting any political candidate, either directly or indirectly

Exercise of political rights

The Company is politically neutral and will not take any act that expresses enthusiasm for or supports any political party or person with political power. However, the company recognizes and respects the rights and freedoms of employees to exercise political rights, such as voting in elections or membership in a political party. Employees must adhere to the following:

- Exercise their rights as good citizens according to constitutional law and other laws related to
- Do not use company assets to support a political party.
- Avoid becoming a member of a political party committee. Representing political parties at various public events or being a member of a local government organization, such as a Provincial Administration Organization (PAO) or a Sub-District Administration Organization (SAO), in no way indicates that the Company is involved in, supports, or is interested in politics or political parties.
- Avoid speaking out at work or during working hours on political issues that could lead to differences of opinion.

Directors, manager, and employees have the right to freely participate in or support various political activities. This must be done outside of company business hours, but may not pretend to be an employee or bring company property, equipment, tools for any political gain

Caution

- Misunderstood as politically neutral or partisan relations with politicians or persons associated with politicians.
- Accepting money from a politician or a relative of a politician or doing business with a politician.
- Wearing the uniform of an employee or being dressed in such a way that others mistake you for an employee of the company when conducting activities related to a political or partisan party.

3.4 Donations and Sponsorship

The Company attaches great importance to social responsibility. It has engaged in a variety of social activities, both in terms of developing education and knowledge and promoting quality of life, cultural and religious arts, etc. Donations to charity are another way of supporting society.

Donations and sponsorships to charities the organization seeks to support social, economic, cultural, and educational endeavors to enhance the company's brand and improve business relationships The organization has a policy to monitor transparency. Not lawfully used as a channel for corruption the company has established the following policy:

1. Charitable donations must serve a charitable purpose and make a real contribution to society without expecting benefits or other consideration that could be considered corruption.
2. Funding must have a purpose. The project must achieve the objectives of the development of society, the economy, culture, and educational activities and genuinely benefit society or fulfil the objectives of social responsibility measures without expecting benefits that can be considered corruption.
3. Donations and sponsorship to charities May only act on behalf of the company through philanthropic contributions and sponsorship, it must be a contribution to a reputable charitable organization and may review.

4. Charitable contributions and sponsorship it must demonstrate the existence of actual charitable project activities and the verifiability of the charitable contributions and donations.

However, the following steps must be observed for donations and financial support:

- The application must be prepared as an "application memorandum or memorandum" stating the name of the donor or sponsor and the reason for the donation or support, along with any supporting documentation to be considered, and must be submitted to the authorized person according to the level of approval authority as follows:

Approval Limit	Authorized person
No more than 500,000 Baht (One Hundred Fifty thousand baht)	Managing Director
More than 500,000 Baht (One Hundred Fifty thousand baht)	Chairman of the Board of Director

- Person with authority to approve Review the "Request Memorandum(s)" to confirm that the purpose of the donation is consistent with the Charitable Donations and Grants Policy and accept if the request for donations or grants is consistent with the Company's requirements, the request is approved.
- The applicant submits documentation of charitable donations and grants to the Financial Accounting Department, such as a thank you letter from the donating or sponsoring entity, a thank you letter, a photo of the donation, a business card, etc., as proof of charitable donations and financial support. After the contribution or financial support, the donor receives a tax receipt.
- The Financial Accounting department checks the receipts for donations and grants and saves the information in the receipt file. It will ask the applicant for additional information or explanations if the supporting documents provided by the applicant are insufficient. If it can be demonstrated that donations and sponsorship do not comply with company guidelines or serve as a pretext or channel for corruption. The company will punish violations in accordance with its own regulations.
- Internal Audit monitors the charitable contribution and sponsorship process annually to ensure that the process is efficient, effective, and governed by appropriate internal controls.

3.5 Procurement

The Company has a procurement control process. This is an important process that promotes sustainability in the company's operations. It must be transparent, honest, and legal. and in accordance with procurement regulations the company has established the following guidelines for procurement:

- Purchasing products and services according to established criteria with efficiency and effectiveness in terms of quality, price, quantity, customer service, warranty, and payment terms.
- The objectives of procurement must be clearly defined. They must be submitted to supervisors for review for appropriateness, and approval must be in accordance with the company's approval authority.
- A transparent and fair comparison of prices and other circumstances among numerous suppliers or service providers can be investigated to acquire goods or services at competitive prices and appropriate terms of sale, including compliance with applicable laws
- Purchase products and services without taking advantage of sellers or service providers. Provide equally complete, accurate, clear, and appropriate information. There is also an open channel for hearing opinions. Suggestions from vendors or service providers.
- The Company does not intend to seek or accept, offer, or give any financial or other advantage to the seller or service provider. If you receive items or services that do not meet the quality criteria of the order or agreement, employees must report this through whistleblowing or complaints channels.

3.6 Sales and marketing

The Company has implemented a method for reviewing sales and marketing activities to ensure that sales and marketing activities are correct and transparent and do not lead to corruption. Customers, agents, and intermediaries are informed of the Company's anti-corruption policies and procedures, starting from the beginning of the business partnership and on an ongoing basis if necessary. The company promotes its customers, agents, and business partners commitment to anti-corruption The following sales and marketing practices have been established by the Company:

- Setting sales prices, various discounts, transportation rates, etc.
- Advertising and marketing
- Opening a new customer account and supporting documents for opening a customer account
- Determination of sales conditions such as credit term, credit limit.

3.7 Human resource management

The Company offers a personnel management process. From the recruitment or selection of staff to the promotion, training and performance evaluation of employees and the awarding of rewards. Supervisors at all levels are required to communicate with and understand the employees under their responsibility, and to control and monitor work processes in order to be efficient:

Employment The Company has determined the types and qualifications of employees for employment. Applicants who meet the criteria established by the company must not have a history of dereliction or neglect of duty or abuse of power or position. Seek undue advantage through corruption in any form. The company has the following procedures for screening and selecting individuals for employment:

- Applicants must apply to the Human Resources Department with the supporting documents required by the company.
- The Human Resources Department will review the requirements and, together with the managers of the various departments wishing to hire employees, will test the knowledge and skills deemed appropriate.
- If the Company has hired a person contractually for a position, he or she is considered a probationary employee for the Company until the probationary assessment for the salary or remuneration specified in the employment contract has been received. The rate of pay is determined according to knowledge, skills, experience, and competitive conditions in the labor market.

Performance appraisal The Company carries out the performance appraisal in 2 phases as follows:

- Performance appraisal during the probationary period Employees who start a new job must work during the probationary period. No more than 119 days from the start date.

- Annual performance appraisal for a common understanding of the employee's goals and performance improvements over the past year, including a workplace behavioral assessment, particularly behaviors that demonstrate a failure or neglect to perform duties or an unlawful exercise of power to obtain improper advantage through corruption in any form

Training and communication The Company disseminates information about its anti-corruption policy and practices to its directors, officers, and employees. At the time of induction, the anti-corruption and business ethics policy and guidelines are distributed to all new hires. In addition, they receive training to become aware of and understand these rules and procedures. All current employees are trained in the anti-corruption policy and procedures by requiring them to sign an acknowledgement attached to their employment contract. Promote knowledge and understanding of anti-corruption laws and practices, such as anti-corruption definitions and procedures, the risk of engaging in corruption, and reporting procedures when corruption is observed or suspected, etc.

3.8 Facilitation Payment

The Company does not have a policy of paying facilitation fees to government officials in any form, either directly or indirectly. Do not take any action. and/or accept any action in return for facilitating business activities This is because facilitation payments to government officials carry a high risk of leading to bribery or corruption it is an illegal expense.

3.9 Revolving Door

- (1) The company does not have a policy of appointing or hiring government officials who still hold positions in government agencies.
- (2) In cases where it is beneficial to the business and does not violate the law, rules or regulations and there is no conflict between the personal interests of government officials. Public benefit or government benefit with the Company's business interests the Company may appoint government officials as directors or advisors. They may work part-time on the company's business without interfering with the routine work of these government officials.
- (3) Hiring of persons who are or have been government officials Appointment or employment as a director, consultant, officer or employee may be made after a due

diligence review of such person's employment history and position as a government official to consider conflicts of interest between the Company and government agencies. Including the establishment of a 2-year period for the appointment of former government officials who have left their position or individuals who have previously worked for regulatory agencies directly related to the company

- (4) The Company discloses past and present positions and work experience of directors, officers, consultants and employees as government officials and sets out in the company's publications the reasons for the appointment of these individuals

3.10 Whistleblowing measures

The Company offers stakeholders both inside and outside the company opportunities for whistleblowing, complaints, and suggestions. In the event that stakeholders are affected by the Company's operations or the performance of duties by its directors, officers, consultants and employees, including illegal activities or conduct that may indicate corruption, the Company will implement a compliance program. In order to comply with the principles of good corporate governance and business ethics, it has defined how to receive reports and complaints and how to deal appropriately and fairly with whistleblowers or complaints.

3.10.1 Asking for advice

If anyone has questions or needs advice on how to comply with the anti-corruption policy and guidelines, they can contact the Human Resources Department or seek advice. The channels for contact and inquiries are as follows:

- **E-mail** : Sent to the Human Resources Manager
- **Letter** : Sent to Human Resources Manager

Siamgas and Petrochemicals Public Company Limited
553 The Palladium Building, 30th Floor, Ratchaprarop Road,
Makkasan, Ratchathewi, Bangkok 10400

- **Phone number** : Human Resources Manager 02-120-9999 ext. 3007

3.10.2 How to report a clue or complaint

Provide the full name, postal address and telephone number of the whistleblower or complainant. including the name of the offender Incidents for which reliable data is available Details of the offense, evidence, witnesses (if any) and other

relevant information. The following channels are available for reporting tips or complaints:

- **E-mail** : Sent to the Audit Committee Email (auditcommittee@siamgas.com)
- **Letter** : Sent to the Audit Committee
Siamgas and Petrochemicals Public Company Limited
553 The Palladium Building, 30th Floor, Ratchaprarop Road,
Makkasan, Ratchathewi, Bangkok 10400
- **Receive box** within the company or the company's branch office

The channels for receiving such reports or complaints were disclosed in the annual information form (Form 56-1 One Report) and on the company's website. Persons who can report reports or complaints of corruption include all groups of stakeholders, including shareholders, customers, trading partners, competitors, creditors, the state sector, communities, society, managers, and employees of the Company. It does not matter which method is used to report information, as mentioned above. The Company keeps the information confidential and does not disclose it to anyone who is not involved.

The report of information or complaints must be made in polite terms and contain at least the following information:

- Name/surname of the complainant
- Facts about the misconduct, evidence, relevant details along with supporting evidence (if any).
- Name/surname of the complainant
- Phone number of the complainant

3.10.3 The procedures for receiving notices or complaints are as follows:

Investigating when receiving a whistleblower or complaint

The recipient receives a tip-off or complaint, this may be processed via the complaint's coordinator. To collect information, facts and evidence and submit the matter to the Complaints Investigator in accordance with the procedures. Alternatively, complaints may be sent directly to the Complaints Investigator to consider and appoint a Complaints Investigation Panel. The Complaints Investigation Panel must not have a conflict of interest in relation to the complaint.

Processing time

The complaints officers will provide a summary of the complaints processed. Including a penalty order (if any) approved by the authorized person to the Complaints Coordinator within 30 working days from the date of receipt of the complaint. If the matter is a Complaints Investigation Committee matter, the findings will be reported to the Complaints Coordinator within 60 working days from the date the Complaints Investigation Committee received the order authorizing the establishment of the Complaints Investigation Committee. If necessary, an extension of the investigation period or a modification of the procedures may be requested if the Complaints Investigation Committee deems it appropriate.

Reporting

The coordinator or complaints coordinator is responsible for ensuring that the results are communicated to the complainant and the parties concerned as necessary and appropriate. If relevant, the findings will be communicated to the Managing Director and/or the Audit Committee and/or the Board of Directors.

If the investigation of the facts and found that the information or evidence that There is reason to believe that the accused has committed corruption. The company will give the accused person the right to be informed of the allegation. and give the accused person the right to prove himself by obtaining additional information and evidence showing that he has nothing to do with the alleged corruption.

If the accused has committed corruption, this is considered a violation of the anti-corruption policy. The accused will be subject to disciplinary action. in accordance with the rules established by the company and if the act is unlawful, legal sanctions may be imposed on the accused. The Managing Director is authorized to issue rules, regulations, notices, and related orders, including delegation of authority, as necessary and appropriate.

3.10.4 Matters receiving notices or complaints

- Matters related to corruption in which the Company is involved, both directly and indirectly, e.g., where individuals in the company give or accept bribes to government officials or private agencies

- Identified violations of the Company's rules and regulations or of the company's internal control system that give rise to suspicion that it may be a conduit for corruption
- Identified actions that may harm the company, affect the company's reputation, or involve conflicts of interest

3.10.5 Matters for which the company does not accept complaints

- Matters raised by the company's Investigation Committee accept them for consideration or have reached a final decision and there are no new findings relevant to the issue of the complainant's dismissal. You have been employed by the company for more than 3 years
- Matters that do not contain evidence or conduct of corruption that is clearly sufficient to enable the facts to be investigated

3.10.6 Measures to Protect Whistleblowers or Complainants and Related Persons

Whistleblowers or complainants and related persons will receive appropriate protection from the company, such as no change in position, type of job, work location, suspension, intimidation, termination of employment or other actions that constitute unfair treatment of that person, including information about complaints will be kept confidential and disclosed as necessary, considering the safety and harm of the whistleblower or complainant, unless disclosure is required by law. Disciplinary and/or legal action will be taken for willful violations of the disclosure policy.

3.10.7 Internal communication

- Risk Management Committee meeting is held to enable the Risk Management Committee to assess corruption risks and regularly review the adequacy of anti-corruption policies and practices. in line with the company's business context
- The Company's employees, including subsidiaries, affiliates, and other companies over which the Company has influence, must be made aware of the anti-corruption policies and procedures via electronic mail, notices, and training programs, etc.

- Allow the company's directors, officers, and employees to sign a written acknowledgement and acceptance of the anti-corruption practices and policy implementation.

3.10.8 External communication

- Preparation of anti-corruption policies and practices This is an annex to the contract between the company and the person acting on behalf of the Company. Company representatives Consultants Brokers Contractors Partners etc.
- Dissemination of information about the anti-corruption policy and practices on the Company's website.
- Disclosure in the annual registration statement (Form 56-1 One-Report) or through other channels as appropriate.

3.10.9 Sanctions in the event of a breach or non-compliance with the policy

In the event that directors of the Company violate or fail to comply with this Policy, the company will establish an Investigation Committee to promptly investigate the facts of such conduct. The Investigation Committee will be comprised of independent directors. throughout the organization there are independent directors who violate or fail to comply with this Policy if an investigation of the facts occurs at any time. These independent directors are prohibited from joining the Investigation Committee in such a situation. and disclose the results of the investigation, including the decision of the Board of Directors, for further review (except for directors who violate or fail to comply with the Anti-corruption Policies and Practices).will be penalized in accordance with the law.

- If it can be shown that the Director has breached or failed to comply with the said policy, the Investigation Committee shall determine an appropriate penalty based on the facts and circumstances of the individual case.
- In the case of officers or employees of the company, violations of or failure to comply with this policy will be subject to disciplinary action. In accordance with the rules established by the company this includes termination of employment in cases where the Company deems it necessary, by means of sanctions based on the facts and circumstances. However, if a violation of or failure to comply

with said policy constitutes an unlawful act. also be penalized as required by law

- The Company uses all internal communication channels to disseminate information about the penalties for non-compliance with the anti-corruption policy and practices and to raise awareness of this policy.
- The Company has created awareness among employees of the implementation of the anti-corruption policy and practices of employees, e.g., by commendation or awarding an award, etc.
- The Company does not have a policy of demoting, penalizing, or imposing negative consequences on employees who reject corruption. Even if the company would lose business opportunities as a result.

4. Conflict of Interest

4. Conflict of interest

Conflict of interest means a conflict between personal interests and the interests of the company. This means that managers or employees make decisions or perform duties in their positions the result is that the interests of the individual or persons associated with them are greater than the interests of the Company. As a result, the person is unable to make fair decisions because they are based on their own personal interests.

The Board of Directors has established a conflict-of-interest policy based on the principle that every decision and every business activity must be carried out solely for the highest benefit of the company, and to avoid actions that create conflicts of interest. By stipulating that those involved in or associated with the transactions under review must inform the company of their relationship or involvement in said transactions and may not participate in the decision-making process, including the fact that they are not authorized to approve such transactions.

The Audit Committee submits to the Board of Directors the related transactions and items with conflicts of interest that have been carefully reviewed for appropriateness and meet the criteria of the Securities and Exchange Commission (SEC) and the Stock Exchange of Thailand (SET). The relevant information is also disclosed in the Form 56-1 One Report.

In addition, the company has established guidelines on conflicts of interest for managers. Managers and employees at all levels adhere to the following practices:

1. Avoiding conflicts of interest is the duty and responsibility of managers. Managers and employees at all levels must understand Adhere and act correctly.
2. Avoid anything that could cause a conflict of interest or be perceived as such. When performing duties, the interests of the company must be respected in accordance with the law and business ethics.
3. Monitoring and controlling transactions that may involve conflicts of interest between themselves and the company. Including the correct use of the company's assets and primarily for the benefit of the company.
4. Fulfilling duties for the maximum benefit of the company, without seeking personal gain or taking no action directly or indirectly seeking personal benefit or the benefit of others more than the benefit of the Company in implementing or complying with Company policies.

5. Do not allow personal interests or the interests of people with whom you have a relationship to conflict with the interests of the company.
6. Do not rely on your position or allow others to rely on your position, either directly or indirectly, to benefit yourself or others in the company.
7. Keep company secrets and do not use secret information for your own benefit or the benefit of others.
8. Must disclose your interests in any organization or transaction that may conflict with the Company's interests and not be involved in decisions about activities in which you have an interest.
9. Do nothing. Neither directly nor indirectly in purchasing, procurement and hiring processes where there is a conflict of interest.
10. Do not appoint or assign persons who may have conflicts of interest to committees, working groups or other bodies.
11. The person reviewing the matter or the person involved in providing information gives opinions or is authorized to give instructions on the matter. When accepting or giving gifts, adhere to the guidelines for accepting or giving gifts established by the company. Accepting or giving gifts in cases where the company's guidelines are not followed is considered a sensitive issue.
12. Honestly report any practice that creates a conflict of interest or is suspected of conflicting with various principles. Or you may ask your line manager for advice first. It should be seen as the line manager's responsibility to monitor and advise on compliance with guidelines and policies specified by the company.
13. When in doubt about the guidelines for avoiding conflicts of interest, employees may first use their own judgement by asking themselves each time before considering the following points:
 - 13.1 Is the transaction consistent with the company's policies and objectives?
 - 13.2 Is the transaction illegal or contrary to business ethics?
 - 13.3 Is the item in question acceptable or may or may not be disclosed to the Company? What does the company think about this item?
 - 13.4 What is the impact of the decision to make the transaction, e.g., on the Company's image, reputation, or benefits?
14. Examples of points that are considered conflicts of interest are:

- 14.1 The intentional use of confidential company information for personal gain or to harm the Company.
- 14.2 Involvement in a partnership Company carrying on business related with the group of companies, or in entering a contract with the company
- 14.3 Soliciting or accepting benefits from contractors, entrepreneurs, product vendors or service providers, or from persons or organizations doing business with the company.
- 14.4 Working or serving on the board of another organization that is a competitor or in a business that has a conflict of interest with the company
- 14.5 Receiving or granting benefits in order to induce actions that are contrary to the interests of the company.

5. Treatment of Stakeholders

5.1 Shareholders Treatment

- The Company strives to be a good representative of shareholders and to conduct its business transparently. Creating maximum satisfaction for shareholders, considering the increase of the company's value and a sustainable good return, including full disclosure of information that is sufficient and reliable.

5.2 Customers Treatment

- The Company strives to provide prompt and reliable service. Build customer satisfaction and trust by providing excellent and reliable products or services provide adequate and accurate information Develop consumer communication channels that are convenient, fast, and accessible. Respond quickly and promptly to customer needs. Resolve problems promptly through an experienced staff.
- The Company treats all customer groups equally. in accordance with applicable regulations, including maintaining customer relationships and not using customer information for improper purposes.

5.3 Treatment of partners and contractual parties

- The Company treats its partners equally, based on fair consideration for both parties, including strict adherence to the contract or agreed terms.
- The Company strives to build and maintain lasting relationships with suppliers and contractors that have clear objectives in terms of quality of goods and services and value for money and are based on mutual trust.

5.4 Treatment of business competitors

- The Company treats its competitors according to the rules of free competition and respects the norms of competition by complying with them.

5.5 Treatment of employees

- The Company is aware of the importance of its employees. They are the company's most valuable resource and one of the factors that will lead to success.

- The Company encourages employees to participate in building a good corporate culture Teamwork Improve the working atmosphere Ensure quality of life, including health and safety in the working environment Encourage employees at all levels to develop their knowledge and skills Increase the potential for continued employment in line with the company's strategic direction Treat employees equally and equitably Ensure good remuneration and benefits Ensure opportunities and career advancement, including retaining potential employees in the company
- A pension fund has been set up. In addition, employees should help to create and maintain an atmosphere of unity and solidarity among employees and avoid any action that could damage the company's reputation or become a problem for the company. Employees should also uphold their honor in order to be accepted in society.

5.6 Treatment of creditors

- The Company strictly adheres to the contracts, agreements, and conditions with creditors. including contingent liabilities and liabilities and are responsible for various securities In the event that any of the conditions cannot be met or there is a reason for default, creditors must be notified immediately without concealing the facts and creditors must be notified in advance in order to find solutions together and avoid damage

5.7 Treatment of consumers

- The Company pays attention to a safe production process. The packaging is free from contamination. Hygiene in accordance with various standards the products are delivered to consumers via the company's packaging.

5.8 Treatment of community/social/environment

- The Company has a responsibility to the community, society, and the environment by sponsoring activities that benefit the public. Contribute to the development of communities, society and the environment and promote employees' understanding of the optimal use of resources and environmental protection.

5.9 Treatment of government agencies

- The Company's operations are governed by rules, regulations, laws, and policies. Various agencies that strictly monitor and support various government projects by liaising with them, coordinating them and being ready to share information Government agencies require news and reports that are exhaustive and accurate. With the aim of increasing social benefits and maintaining positive relations with the authorities

6. Ethics of treatment of company

The Company observes the statutory provisions. Relevant government and regulatory requirements and regulations, including company rules or mandates. Employees must refrain from actions that are illegal, against public policy or immoral. The use of company assets or personnel for illegal activities is strictly prohibited. In addition to complying with the law, all employees must perform their duties in accordance with the company's Code of Ethics. It is of critical importance to the company.

6.1 Laws and rules of the Company

- Employees must abide by the law. Strictly related terms and rules.
- Violations of the law. Shareholders' resolution Resolutions of the Board of Directors, Articles of Association, rules, or orders of the company Claiming that it is an act to increase profit for the Group or any other reason is not a reason to listen.
- Employees must perform their duties honestly and with due regard to the legitimate interests of the company, even if there are loopholes or loopholes in the company's regulations, rules, and directives.

6.2 Securities Law and disclosure of internal information

- Employees will comply with securities laws. Strictly comply with the regulations of the Securities and Exchange Commission (SEC), the rules and pronouncements of the Stock Exchange of Thailand (SET) and related laws. This also applies to the disclosure of information to shareholders and/or the public
- Use of inside information that has not yet been disclosed to the public or general shareholders by employees for the purpose of personal securities trading. This is considered unethical behavior by the company.
- Prohibit managers and employees who are involved in the preparation of financial reports and know information about them. Purchase and/or sell securities of the company 30 days prior to disclosure. For other important information, officers and employees who are aware of the information are prohibited from buying and/or selling the company's securities prior to the date the company reports such information to the Stock Exchange of Thailand.

- The publication of information affecting the company's business and securities prices must be authorized by the Managing Director. The Managing Director shall act or appoint a person responsible for the disclosure of such information.
- The central offices that disclose information to the public and investors are: Company Secretariat and the Investor Relations Department, with the person concerned being responsible for supporting the information.
- Employees should not comment on the trading of company shares. Unless it is in connection with the duties assigned by the company.

6.3 Protecting Company Assets

- The Company assets are real estate, technology, academic knowledge, information, rights, copyrights, patents, and all resources that belong to the company or to which the company is entitled.
- Employees have a duty and responsibility to use the company's assets economically and for the benefit of the company and to ensure that they are not damaged or lost.
- Business information and documents are important assets of the company. Each department must determine the retention period. Hierarchy of confidentiality of information and documents and keep these information and documents correctly. Completeness can be checked at any time.
- Employees must prepare business documents. Accounting and financial records and various reports delivered to authorities and others must all be recorded carefully and in good faith and in accordance with the company's accounting methods in accordance with established professional standards.
- Employees are required to strictly comply with accounting, financial and internal control regulations. Any errors must be reported to the Assistant General Manager of Accounting and Finance or the General Manager.

6.4 Computer Systems and Communications

- Employees must follow policies and instructions regarding the use of computer equipment and communications, including the Company's electronic data, solely for the benefit of the Company and must not do anything that violates the law or benefits the Company's own. The Company has the right to control the use of computer equipment. Electronic data or

information technology such as data transmission Data collection by No permission or notification required.

- Employees must avoid websites that the company considers to be illegal or against common decency and refrain from disclosing such information or websites to others and avoid unknown websites whose security is questionable.
- Only certain employees have access to the files. Unauthorized employees are prohibited from viewing, copying, distributing, deleting, destroying, or altering information, changing passwords, or taking other actions that could cause harm.
- Persons who use company computers. The software must be licensed by the company and used with the consent of the copyright holder. To avoid problems with intellectual property infringement.

6.5 Intellectual property

- The works created in the performance of the tasks are the intellectual property of the Company.
- The use of works or information of third parties acquired or intended for use within the Company It must be verified that they do not infringe the intellectual property rights of others.
- Upon retirement, employees are required to surrender various intellectual property rights. This includes all works, inventions, etc. belonging to the company, regardless of how they are stored in the form of information or on paper.

7. Procurement and Transaction ethics

7.1 Procurement

- The Company will operate in accordance with the following procurement policies and procedures:
 - Competition based on equally obtained information.
 - Criteria for the evaluation and selection of partners and contractors.
 - Creation of appropriate contractual conditions
 - Establish a management and monitoring system to ensure that contract terms are fully complied with and prevent corruption at every step of the procurement process.
 - Paying partners and contractors on time and in accordance with agreed payment terms
- Employees are prohibited from using information that has become known to them during procurement. Procuring for their own benefit, for the benefit of a partner, a specific contractual partner or another business partner not associated with them, such as family, close relatives or their own or partnered persons
- Procurement must be conducted in accordance with the procurement regulations and methods and strictly by the competent body in accordance with the approving authority.
- Employees will refrain from taking any action. Partners will not be required to pay taxes that must be remitted to the government.

7.2 Transactions between companies in the group

- Employees shall study the rules, procedures, approval authorities and follow the procedure established by the Company before acting.
- If they have tasks related to transactions with related parties, employees must inform their superiors of the conditions. Detailed rules or the nature of the transaction
- Projects or transactions between the parties must be carried out in accordance with the regulations and strictly comply with both the legal and regulatory procedures issued by governments or regulatory authorities and the company's rules and regulations
- If in doubt, ask your supervisor or the Deputy General Manager of the Accounting and Finance Department.

7.3 Transactions with third parties or companies

- The transaction must consider the quantity, value, price, quality, conditions of service in accordance with market mechanisms or fair prices. without discrimination or obstruction of business by unfair or unlawful means
- Employees should avoid transactions that could damage the company's reputation, even if the transaction brings business benefits
- Employees must not impersonate the company. Employees must not impersonate company employees, even if the transaction has no direct impact on the company

8. Employee ethics

8.1 Treatment of employees

- The Company will treat all employees with respect and dignity.
- The Company will select employees for various positions fairly, considering the qualifications of each position. The educational qualifications, experience, and other requirements necessary for the position will not be limited by gender, age, race, or religion.
- The Company determines compensation for employees fairly, according to the conditions and nature of the work, performance, and the company's ability to pay compensation;
- The Company encourages training and development of employees to improve work efficiency and enable employees to continue working
- The Company recognizes that good communication leads to efficiency and good working relationships. Therefore, the company will encourage employees to learn about relevant news as soon as possible.
- The Company will give employees the opportunity to use communication channels. Suggestions and complaints relating to work will be taken seriously and remedial action will be established for the benefit of all parties and to build a good working relationship
- The Company retains employees' personal information, such as personal history, health history, work history or other information. Disclosure or transfer of employees' personal information to the public can only be made with the employee's consent. Violation is a disciplinary offense unless it is done in accordance with company policy or the law

8.2 Behavior of employees and treatment of others

- Supervisors should behave in such a way that they are respected by employees, and employees should not do anything that is disrespectful to supervisors
- All employees should not take any action that is offensive or threatening, whether verbally or through actions against others based on race, gender, religion, age, physical or mental disability.
- Employees should perform their duties with honesty, integrity, and diligence to ensure quality, efficiency, and organizational development

- Employees will not defame management or other employees by making false statements.
- Employees will help to create and maintain an atmosphere of unity and solidarity among employees.
- Employees shall avoid any action that could damage the company's reputation or pose a problem for the company.

Epilogue

Business ethics cannot comprehensively address every situation or provide answers to every question that might arise. It is imperative that companies rely on employees to use their own judgment to decide what is right and when to consult with others to create appropriate behavioral guidelines

If there is uncertainty about what is "the right thing to do" Ask the following 5 questions.

1. Do these acts or omissions result in harm to the life, health, or safety of others?
2. Do these acts or omissions violate the law of the land, local laws, or other regulations?
3. Does this act or omission violate the company's approved policies and guidelines?
4. If such act or omission is known to supervisor or colleagues, will I be ashamed?
5. Is this action or inaction inappropriate, dishonest, or damaging to the company's image?

If the answer to any of the above questions is "yes", it is likely that your actions or not practicing it violate or violate business ethics or in case of doubt or uncertainty, should seek advice through the channels indicated by the company

Finally, you should keep in mind that compliance with business ethics is an ongoing process and the Company shall use its best efforts to implement and maintain compliance with the Code of Conduct in good faith and without further