



**-Translate-**

## **Business Code of Conduct**

### **Sky ICT Public Company Limited**

Sky ICT Public Company Limited has established this Code of Conduct to serve as the correct course of business. The company's associated personnel include directors, executives, employees, employees, as well as representatives of the company (collectively, "Company Personnel") and subsidiaries and associates or companies. Other than that the Company has control, must study, understand, respect, do not violate, and strictly perform the duties of the laws, regulations, directives, declarations, and regulations of the Company, including the criteria, requirements, and regulations of the relevant government agencies, as well as respect the customary customs and culture of the locality, as well as provide complaints and clues when they see violations or do not comply with the law.

This Code of Business reflects the values and spirit of the Company to operate with integrity with regard to its social, legal and moral duties and responsibilities, shareholder responsibility, relationships with trading partners and competitors, employee responsibility and environmental responsibility. For its subsidiaries and associates, affiliates or groups, it is appropriate to consider applying them to the business context through the internal approval process of each company.

This Code will be reviewed and updated regularly at least once a year to bring its content into line with the Company's operations and internationally accepted practices. The Company has announced and informed all relevant personnel to acknowledge and sign and strictly follow the Guidelines to lead the Organization to further achieve its goals of stability and sustainable growth. The following details are given:

#### **The Company's Code of Business Conduct**

##### **Integrity and responsibility for business**

###### **1. Legal, Regulatory, and Company Policy Compliance**

###### **Code of practice:**

- (1) Company personnel shall thoroughly study and understand the laws, regulations, rules, orders and declarations as well as the procedures relating to their own duties and responsibilities and comply with them in a strict manner without neglecting or ignoring or causing any damage to the Company, their colleagues, as well as any person associated with the Company.
- (2) The customs, traditions and cultures of each area or country in which the company is engaged must be respected.



- (3) Do not provide assistance and do not encourage acts that avoid or contravene compliance with the laws, regulations, rules, orders and announcements of the Company.
- (4) In case of a breach or non-compliance with the company's laws, regulations, regulations, orders and notices, report to the supervisor or complaint channel in accordance with the policy of immediately reporting clues.

## 2. Conflict of Interest

### Code of practice:

- (1) The Company's personnel shall avoid any action contrary to the Company's interests, whether due to contact with the Company's commercial related parties, such as partners, customers, competitors, or using the opportunities or information obtained from being a director or employee in their personal or personal exploits.
- (2) Company personnel shall not engage in competitive or similar business with the Company and shall not perform other than the Company's work which affects the work of the Company or negatively affects the operation of the Company.
- (3) Company personnel shall omit shareholding or decision-making or management in a competitive undertaking or competitor of the Company. If the employee acquired the shares before the employee or before the company entered into the business or acquired it by inheritance, including unavoidable cases, report the information through the channel according to the form and procedures prescribed by the Company.

## 3. Anti-Corruption

### Code of practice:

- (1) Company directors, executives and employees of the Company must strictly comply with the Anti-Corruption Policy and the Code of Business and not encourage corruption or corruption, including bribery, in all its forms, directly or indirectly.
- (2) Charitable donations, donations to political parties, giving business gifts and sponsoring the activities of outsiders, require transparency and no covert intent to convince public or private officials to take improper action.
- (3) Company personnel must avoid giving or receiving gifts, gifts, receptions, and any other benefits in order to ensure independence of duty if any person is found to receive benefits exceeding the traditional or customary value of not more than 3,000 baht, otherwise they may be questioned or punished according to the company's policies and regulations.



(4) If an act is seen that engages in corruption, improper, or corrupt practices, the sightseer must not neglect or ignore such behavior by promptly notifying the supervisor or through a company-designated channel.

#### 4. Gift and entertainment

##### Code of practice:

- (1) The Company's personnel shall not call, receive or consent to receive any money, things, or other benefits from any contractor, partner, venture capitalist, customer, or business related to the Company in any case whatsoever, whether to motivate the recipient to treat or refrain from such practices, including any acts committed against it, and shall not give any bribes or benefits of similar nature to the employees together or to any outsiders, especially government officials.
- (2) Company personnel may accept or provide gifts, or property, or any other benefit in accordance with festivals or traditions, or to maintain friendship, including good relations between individuals, but shall not exceed 3,000 baht in price or value, and shall not be cash or cash equivalent. By receiving or giving gifts, it shall not affect any business decision of the recipient.
- (3) The giving of gifts, property or any other benefit to outsiders including government officials, both in Thailand and abroad, shall not be contrary to local laws and customs.
- (4) If the personnel of the Company receive gifts or property or any other benefit on traditional occasions of exceeding normal value from a business associate with the Company, they shall report to the supervisor in the hierarchy. If the supervisor considers that it is not appropriate to return it immediately to the giver, the entity having contact with the partner, client, venture capitalist, or person who is involved in the business of the Company shall regularly inform the relevant person of the Code.
- (5) If any of the Company's personnel or superiors intentionally or neglects or does not comply with this practice, he shall be deemed to be in non-compliance with the regulations prescribed by the Company and may be investigated or punished in accordance with the Company's policies and regulations.

#### 5. Anti-Trade Competition

##### Code of practice:

The Company is intent on promoting free and fair trade competition to benefit consumers and society as a whole by adhering to good trade practices in accordance with the Trade Competition Act 2017 as follows:

- (1) Not to conduct business by unfairly exercising power over the market, viz.
  - Unfairly determine or maintain the level of the purchase or sale price of goods or service charges.



- Define conditions in an unfair manner for another business operator whose partner is to restrict the service, production, purchase or sale of goods or to restrict the opportunity to purchase or sell goods, obtain or provide services, or to procure loans from other business operators.
- Suppress, reduce or restrict the services, production, purchase, sale, delivery, import into the Kingdom without reasonable cause, destroy or damage the goods in order to reduce the quantity below market demand.
- Interfere in the business of others for no reasonable reason.

(2) Do not make any trade agreements that are monopolies, or reduce competition, or restrict competition, i.e.

- Determine the purchase price or sale price or any trade conditions affecting the price of goods or services.
- Limit the amount of goods or services that each business operator will produce, buy, sell, or service as agreed.
- Define agreements or conditions in a uniform manner so that a party receives an auction or tender for goods or services, or that a party does not compete in the auction or tender for goods or services.
- Divide the locality to be sold or determine the buyer or seller in that locality.

This is except where a law or regulation of the civil service shall exclude or provide, for example, an act between business operators with a policy or command relationship, or an act intended for the development, production, distribution of goods and the promotion of technical or economic progress, or as an agreement or business model as permitted in a ministerial law.

(3) Not to commit any act which causes damage to other business operators viz.

- Unfairly discourage the business practices of other business enterprises.
- Unfairly exercise superior market power or bargaining power.
- Define trade conditions as an unfair restriction or obstruction of the business of others.
- Act in such other manner as the Board declares.

## 6. Clue reporting (Whistleblowing)

### Code of practice:

(1) Company personnel, shareholders, customers, partners, stakeholders or other persons engaged in business with the Company can report to the Company any wrongdoing, official rules, unethical acts, embezzlement, corruption by employees or other persons, both actual acts and suspicious incidents that can damage the Company both financially and unfinancially.



- (2) The complainant or whistleblower will be protected rights, the company will not discipline and allow bullying, retaliation against the complainant in good faith, all monitoring procedures will be supervised only by those involved and the information will be kept confidential.
- (3) Where it is proved that the complaint received is false information, with the intention of misrepresenting the facts, or in defamation of another, the complainant or whistleblower is deemed to be unethical to the business of the company and shall be punished according to the regulations or according to the relevant law.
- (4) Reporting can be done through 3 channels, namely
  - By email. By sending it to: [whistle-blower@skyict.co.th](mailto:whistle-blower@skyict.co.th)
  - By mail, by sending a letter to the Audit Committee of Sky ICT Public Company Limited, No. 55, A.A.Capitol Ratchada Building, 6th-7th Floor, Ratchadapuk Road, Red Din District, Red Din District, Bangkok, 10400.
  - Online. By sending it to <https://www.skyict.co.th/whistle-blowing>

### **Proper use of information and property**

#### **1. Treatment and use of Company's Information and Assets**

##### **Code of practice:**

- (1) The Company's personnel have the duty and responsibility to maintain the property of the Company not to be corrupted, lost, and to use the property effectively to benefit the Company fully and not to use the property of the Company for the benefit of themselves or others. This property refers to both tangible and intangible property such as real estate, real estate, technology, academic knowledge, rights documents, patents, copyrights, as well as confidential information that is not made public including business plans, financial estimates, human resources information.
- (2) Company personnel are responsible for maintaining confidential information of the Company, not leaking it to external parties, which may cause damage to the Company or to interested parties, even after the expiration or termination of their work with the Company. This shall include any information relating to the Company which is not made public, and whether it is listed as confidential or not, if reasonable, it can be regarded as confidential information.
- (3) In addition to information made available to the public, the information of the Company shall be considered to be internal use only. All its personnel shall use it under the duty and responsibility framework assigned to them. It shall not be used or disseminated to any other person or for their personal benefit.
- (4) Company personnel shall carefully preserve the personal data obtained and use the personal data only within the scope of the law and for the purpose of keeping, using, collecting such personal data. They shall comply with the personal data protection policy and security measures of the Company's information technology systems.



## 2. Insider Information

### Code of practice:

- (1) Company personnel shall avoid using insider information or information that has not been made public to their advantage in buying or selling shares of the Company or providing insider information to other persons for the benefit of buying or selling shares of the Company.
- (2) Directors and executives, by the definition of the SEC, are responsible for reporting the company's securities trading within 3 business days of the company's securities trading operation, to prevent the purchase or sale of shares using insider information, and to bypass allegations about the appropriateness of buying or selling shares of individuals.
- (3) Directors and executives, by the definition of the SEC, should refrain from buying or selling shares of the company during the 30 days prior to publishing financial statements or publishing the status of the company, including other important information, and should wait at least 24 hours after the disclosure to the public before buying or selling shares of the company.

## 3. Information and IT Security

### Code of practice:

- (1) The Company has established an information technology security policy to enable the information technology systems of the Company, its subsidiaries and associates to be appropriate, efficient, stable, secure and able to continue their business activities in accordance with Cyber Security Comprehensive Standards, with the IT Security Working Group to supervise the implementation of the policy and administer information security incidents.
- (2) The company is committed to the adoption of information technology as part of its strategy and operations to advance its work and increase business opportunities with prudence and caution, with appropriate security measures being established.
- (3) The company's personnel must strictly comply with the company's laws, policies, and practices on the use of information technology to prevent problems that may arise from incorrect use of information technology systems and from being threatened by threats.

## Treatment of colleagues and work environment

### 1. Employee Conduct and Treatment of Colleagues

#### Code of practice:



- (1) Always perform your duties with professionalism, determination, integrity and transparency.
- (2) Refrain from giving gifts to superiors or accepting gifts from subordinates.
- (3) Respect the rights of other employees, value and treat colleagues politely and fairly.  
The company encourages a good working environment, open to communication, cooperation and mutual support.
- (4) The supervisor shall behave in the respect of the employee, and the employee shall not commit any act of disrespect to the supervisor.
- (5) Be disciplined and follow the rules of the organization and its fine traditions, whether written or not.
- (6) Not to commit any act that engages bullying, harassment, discrimination, or behavior that constitutes an inappropriate or hostile atmosphere for work, differences of opinion should be expressed with politeness, and resolved through constructive talk.
- (7) Avoid any action that may affect the reputation and image of the company or be a problem to the company later.

## **2. Safety, Occupational Health and Workplace Environment Code of Practice:**

- (1) The company will continue to develop occupational health safety and work environment management systems to prevent occupational injuries and diseases in accordance with various laws and requirements related to hazardous risks of the establishment and practitioners on behalf of the establishment.
- (2) The Company is engaged in occupational safety, health and work environment activities, with the responsibility of all personnel required to participate in the activities of such establishments.
- (3) The Company evaluates and improves risk prevention to standards to prevent potential incidence at work, as well as other related activities on an ongoing basis.
- (4) The Company continues to campaign to strengthen the quality of life and good hygiene for its personnel.
- (5) The company has adequately and appropriately contributed resources to strengthen operational consciousness to meet certain standards and methodologies in occupational safety, health and the work environment.



## **Responsibility to stakeholders and society**

### **1. Customer Treatment and Product Quality**

#### **Code of practice:**

- (1) Deliver quality products that meet or exceed customer expectations. Under fair conditions.
- (2) Provide customers with accurate and timely information about products and services in order to provide customers with sufficient information to make decisions without exaggerating either in advertising or in other channel communication with customers, causing customer misunderstanding of the quality, quantity or condition of the goods or services.
- (3) Maintain customer confidentiality and not apply it for their own benefit; or those wrongfully involved.
- (4) Meet customer needs quickly and provide a system and channel for customers to effectively complain about the quality of goods and services.

### **2. Conduct Toward Business Partners and / or Creditors**

#### **Code of practice:**

- (1) Treat partners and creditors equally and fairly and are based on a fair return to both parties. Strictly comply with agreed contracts or conditions. If one of the conditions cannot be met, the partners and / or creditors must be notified in advance to jointly consider a solution.
- (2) In business negotiations, any dishonest benefit in trade with partners and / or creditors shall be omitted. If information is available that any dishonest benefit has been called, received or paid by an employee, the Company shall disclose details through the Company's whistleblowing channel or complaint in order for the Company to investigate the facts and continue to take the steps specified by the Policy for Reporting Clues.

### **3. Conduct Toward Trade Competitors**

#### **Code of practice:**

- (1) Behave within the framework of the rules of competition fairly, transparently, unexploited.
- (2) Do not seek confidential information of commercial competitors by dishonest or improper means, such as paying wages to employees of competitors, etc.
- (3) It does not damage the reputation of commercial competitors by making malicious accusations, making false news or attacking competitors.



- (4) It does not agree with any competitor or individual in a manner to reduce or restrict commercial competition.
- (5) In dealing with competitors, company personnel must not disclose or neglect the company's secrets into the hands of competitors.

#### **4. Sustainable enterprise development in accordance with the ESG (Environment, Social and Governance) approach**

##### **Code of practice:**

All directors, executives and employees of the Group are responsible for supporting, driving, promoting and following the established policies for the sustainable development of the Organization according to the established guidelines to build a sustainable society to grow steadily together in the environmental, social and corporate dimensions throughout the value chain. This will bring the best benefit to all stakeholders as follows:

##### **(1) Environmental aspects**

- Maximize the use of resources, including seeking ways to reduce resource and energy consumption, as well as to prevent pollution and reduce greenhouse gas emissions.
- Choose to use machines and production processes that produce the least waste, as well as seek innovative ways to enhance management efficiency and control quality. An even better environment meets generally recognized standards.
- Conduct a business with a focus on energy conservation along with environmental responsibility. All employees are required to follow the company's environmental and climate policies or other relevant policies, including various standards and environmental laws related to the Kreen Krug.

##### **(2) Social aspects**

- Mindful of human rights and human dignity, oversee and treat all groups of stakeholders, including employees, surrounding communities, and society, fairly and equally, without discrimination of race, color, religion, sex, age, nationality, gender, or anything else. Strictly abide by the company's human rights policy and have a regulatory process to trust that the company does not engage in direct or indirect human rights violations.
- It oversees hygiene, and the safety of employees and employees of the Group, with a focus on respecting employees' rights and labour protection laws as required by law.
- Promote in developing the company's personnel potential at all levels, with an evaluation system that meets company-defined criteria, adheres to good corporate governance principles and aligns with the Group's development approach, to achieve the delivery of value to the community and society, along with the delivery of quality products and services in accordance with international standards.
- Give priority to community and social action to achieve the continuous development of conglomerates, communities and societies.



**(3) On corporate governance.**

- Conduct business in accordance with good corporate governance and governance, as well as provide relevant policies, regulations, announcements for company personnel to adhere to and comply with.
- It upholds a moral and transparent code of conduct in business and operations, along with complying with the laws, regulations, regulations, methods and standards that regulators have established and in accordance with the international standards generally observed.
- Encourage and encourage business development, together with partners, partners and stakeholders throughout the business value chain, to be accurate, transparent and verifiable in order to enable business practices along a sustainable development approach.
- Priority is given to adhering to the Business Code and Anti-Corruption Code of Conduct, with a focus on promoting corporate culture for all levels to recognize the harmful effects of corruption, as well as to create values correctly, so as to encourage relevant stakeholders to adhere strictly.

**Discipline and penalties**

All directors, executives, employees, employees, as well as representatives of the Company shall strictly acknowledge, understand, and comply with this Code of Business. If any wrongdoing, contravening, or acting contrary to this Code of Business shall be subject to disciplinary action in accordance with the regulations relating to the work, regulations, announcements, or decrees prescribed, including termination of employment, in serious and necessary cases. In addition, those who commit a business code of conduct may receive legal penalties if the act is also an offence under the law.

If you see any suspicious, probable, or contravening of the Company's Code of Business, the Company shall notify you of any wrongdoing in accordance with the channel established by the Company under the Policy for Immediate Reporting of Clues.

To take effect from 14 November 2025 onwards.

-SOMKIT LERTPAITHOON-

(PROF. DR. SOMKIT LERTPAITHOON)

Chairman

Approved by the Board of Directors Meeting No. 9 / 2025

On November 13, 2025



The book acknowledges and holds compliance with the Business Code of Conduct.

I, Mr. / Mrs. / Ms.....

Company.....

I realized that if I acted in violation of this "Code of Business," I would receive appropriate company discipline.

Sign.....

(.....)

Staff number.....

Day..... / Month..... / year.....