

- Translation -

**Code of Conduct**

The Board of Directors of Sahathai Terminal Public Company Limited, hereinafter referred to as the "Company" and its subsidiaries collectively referred to as "the Group" has established this Code of Conduct which is an integral part of the Good Corporate Governance Policy as a guideline for directors, executives and employees of the Group. This Codes of Conduct provides guidelines on the following issues:

1. Compliance with applicable laws and regulations.
2. Recognition of human rights.
3. Conflict of interest.
4. Confidentiality and Securities data storage.
5. Treatment of customers and service quality.
6. Treatment of business competitors.
7. Procurement and fair treatment of business partners.
8. Responsibility to the community, society and environment.
9. Treatment of employees / labor.
10. Treatment of creditors.
11. Internal control and audit and financial reporting.
12. Occupational safety, health and environment.
13. Intellectual property, use of information and communication technology and appropriate use of the Group's asset.
14. Business opportunities.
15. Securities trading of the Company's shares and use of inside information.
16. Receiving/giving gifts, property, or any other benefits.
17. Anti-corruption.

Moreover, the Board of Directors already has reviewed the Code of Conduct, and has a resolution to pass this policy which is enforced from 18 December 2025 onwards.



(Mr. Yuth Vorachatthan)

The chairman of the Board of directors

**ALL THE RIGHT CONNECTIONS**

**1. Compliance with applicable laws and regulations.**

Directors, executives and employees of the Group have an obligation to strictly comply with the applicable laws, regulations, policies, and operation manuals of the Company as a common practice and to refrain from any activities that would jeopardize the Group's reputation and credibility. Personnel at all levels shall uphold and obey all applicable laws and insist on acting in a morally and legally responsible manner.

**Good practices**

- 1.1 Directors, executives and employees shall thoroughly study and understand and strictly comply with the laws and regulations relating to their operations, both locally and internationally, directly related to their duties and responsibilities.
- 1.2 Directors, executives and employees shall comply with the laws and regulations of the Stock Exchange of Thailand and the Securities and Exchange Commission.
- 1.3 The Company should compile all relevant laws and regulations for its directors, executives and employees to understand and provide its personnel with appropriate training on relevant laws.
- 1.4 Directors, executives, and employees may not engage in any illegal behavior such as embezzlement, fraud, and giving or receiving bribes of any type.
- 1.5 In the event that any director, executive, and employee becomes aware of any operation or action that is suspected to be an illegal or immoral act, such person shall promptly report such behavior to its supervisor as deemed appropriate.
- 1.6 Directors, executives and employees shall not violate any regulations/announcements regarding anti-corruption policy.

**2. Recognition of human rights.**

The Group recognizes the international human rights principles and respects the dignity and personal rights of its directors, executives and employees. The Group provides equal employment opportunities, compensation and promotion, child labor is not tolerated in any form and does not tolerate discrimination, employment discrimination, harassment or intimidation based on nationality, race, class, gender, age, religion, beliefs, and social status, including supporting employment for the disadvantaged to create opportunities, careers and stable incomes.

Executives and employees have equal opportunities to receive appropriate support and training in order to develop their knowledge and abilities according to the needs of each level of position.

**Good practices**

- 2.1 The Group shall strictly comply with international human rights and creating knowledge and understanding of human rights for its employees to put into practice as part of operations and shall not support businesses that violate human rights
- 2.2 Directors, executives and employees should treat colleagues with respect for their honor, dignity and personal rights.
- 2.3 Directors, executives and employees should treat people politely and equally without discrimination regardless of nationality, race, class, gender, age, religion, beliefs, social status, etc. As well as taking care of the rights of employees to comply with the law in various aspects such as compensation, occupational safety and health, freedom of association and collective bargaining, etc.
- 2.4 Directors, executives and employees should respect the cultures and traditions of Thailand and the countries in which they conduct business activities and conduct their activities in a manner that is acceptable to the social and economic conditions of such countries.

**3. Conflict of interest.**

Directors, executives and employees of the Group should not engage in any act which may result in conflict of interest with the Company by taking into account the Company's interests, without being influenced by personal needs or pressure from those close to them. This includes accepting benefits in the form of special privileges or reciprocal benefits that may have harmful effect to the Group. Therefore, all directors, executives and employees should strictly comply with the Company's measures for preventing conflict of interest and disclosure of conflict of interest.

**Good practices**

- 3.1 Directors, executives and employees are prohibited from engaging in a business which is competitive to the Company's business or create conflict of interest with the Company unless specifically authorized by their supervisors.
- 3.2 Directors, executives and employees are prohibited from using their influence or power to enter into any transaction between the Company and the person or legal entity in which they hold shares or person with a blood connection or any other means other than the benefits they are eligible, unless their interests have been disclosed and approved by the authorized person in writing for consideration according to the procedures before the Company enters into such transaction.
- 3.3 Directors, executives and employees should make decisions regarding business operations in the best interest of the Company without being influenced by personal needs or pressure from those close to them, whether by blood or any other means, using fair and appropriate prices as if it is a transaction with a third party. If there is any transaction with possible conflict of interest, the directors, executives and employees shall report it to the authorized person in writing for consideration according to the procedures before the Company enters into such transaction.
- 3.4 In order to give other attendees a chance to consider, analyze, and critique the agenda without the stakeholders' influence, the stakeholders on such agenda who are present during the meeting are required to leave the meeting for a brief period of time and shall not be provided with the relevant agenda documents.
- 3.5 Directors, executives and employees shall carefully consider conflict of interest regarding connected transactions between the Company and its subsidiaries and associates with honesty, reasonableness and independence within the ethical framework, taking into account to the best interest of the Company.
- 3.6 Directors, executives, and employees who have doubts or are unsure whether as to whether a perceived or actual conflict of interest exists in their action should immediately inform such matter by submitting the Company's Conflict of Interest Disclosure Form with details attached to the authorized

person for approval and sending a copy thereof to the Company Secretary for further consideration.

- 3.7 Directors, executives and employees, including their family members, shall refrain from having financial involvement and/or relationships with other third parties which may result in loss of benefit to the Company or conflict of interest.
- 3.8 Directors, executives and auditors of the Company are required to disclose any conflict of interest related to the management of business operations of the Company, its subsidiaries and associates as well as the holding of the Company's shares by them or their related persons according to the regulations set forth by the Stock Exchange of Thailand.
- 3.9 Directors, executives and employees shall comply with the rules, procedures and disclosure of information on connected transactions in accordance with the rules of the Stock Exchange of Thailand, the Securities and Exchange Commission and the Public Limited Companies Act.
- 3.10 Directors, executives and employees shall refrain from giving/accepting entertainment, gifts, presents or gratuities from those doing business with the Company as such actions may cause unfairness in making commercial decisions.
- 3.11 Any unacceptable and inappropriate compliment or gift shall be returned to the giver immediately. If it cannot be returned, the employee shall give such item to the Company for further use as the Company deems appropriate.
- 3.12 Recruitment of any new employee who are related to directors, executives and employees shall be transparent and fair to those with the same qualifications. Directors, executives and employees shall not interfere or use their position to seek employment for family members.

**4. Confidentiality and Securities data storage.**

Directors, executives and employees of the Group shall maintain the confidentiality of information acquired while performing their duties, especially information that may have an effect on the Group or its stakeholders. This includes any and all information that partners and clients have entrusted the Group with. It is the responsibility of the Group to keep such information confidential and disclose it on need-to-know basis. It is therefore the responsibility of the person in charge of or in possession of the information to strictly maintain its confidentiality, unless such disclosure is duly authorized by the Group or is required by law.

**Good practices**

- 4.1 Directors, executives, and employees are obliged to keep any confidential information of the Group, such as trade secrets, service costs, business partners, and other secrets, from leaking to unrelated persons, which may cause damage to the Group or its stakeholders, unless such disclosure is approved in writing by the authorized person or required by law for the purpose of litigation or approved by the Board of Directors.
- 4.2 Directors, executives and employees may not use the Company's confidential information for their own or others' personal gain.
- 4.3 Upkeep and discussion of the Group's documents and confidential information must be handled carefully. Confidential information may become public knowledge if documents are left unattended or when it is discussed in public.
- 4.4 Directors, executives and employees may not disclose the Company's confidential information even after leaving their positions or their employment with the Group is terminated.
- 4.5 Inside information is the Group's confidential information on its operations and business management that has not been disclosed to the public media. If it is disclosed, it may have an impact on the Group, especially the value of shares traded on the Stock Exchange of Thailand. Directors, executives and employees shall therefore keep inside information confidential.
- 4.6 When hiring a person who has previously worked with the Groups' business competitor, the Group shall review the confidentiality agreement that person has previously made with such business competitor and shall not take any action to cause that person to act in violation of a confidentiality agreement made with such business competitor that will result in a lawsuit.
- 4.7 Dissemination of news and information relating to the Group's business to the public through printed materials, lectures and interviews shall be carried out by the Group's employees who have the authority in order to offer consistent and accurate information.

**5. Treatment of customers and service quality.**

The Group attaches great importance to providing services that meets the needs of customers and carries out its obligations with the highest benefit of customers in mind by offering fair prices, high-quality products and service and acting responsibly towards customers. The Group is especially focused on meeting customers' needs quickly, to the highest standards, with good manners, non-discrimination, and punctuality. Additionally, the service quality has been steadily and consistently improved. In order to better its services, the Group also pays great attention to its consumers, conducting customer satisfaction surveys to hear their comments or complaints. Maximum client pleasure is the Group's goal, as is long-term relationship maintenance.

Additionally, the Group has a policy to protect its customers' information and not use it unlawfully for the Group's or any other person's profit, unless the customer has authorized disclosure of the information or the Company is required to do so by law.

**Good practices**

- 5.1 Executives and employees shall pay close attention to the service process and strictly follow the regulations established by the Group in order to deliver high-quality and prompt service.
- 5.2 Executives and employees shall study and understand customer needs in order to correctly respond to customer needs and offer quality services that with customer needs as well as disclose complete and correct information related to services.
- 5.3 Executives and employees shall treat customers with politeness, respect and kindness.
- 5.4 Executives and employees shall respect customers' opinions and decisions and shall not violate customers' personal rights.
- 5.5 Executives and employees shall protect customers' personal information and refrain from abusing it for their own or others' improper gain.
- 5.6 The Group has channels for receiving complaints. To give customers the opportunity to make complaints about the service. Executives and employees shall pay close attention to customer complaints and behave honestly in order to quickly respond to customers.
- 5.7 The Group is committed to improving safety in the Company's services by mandating warning signs, conducting workplace safety inspections, running campaigns, and enforcing strict and ongoing employee safety training.
- 5.8 The Group must neither deceive nor mislead customers or consumers regarding service quality. The Group shall conduct detailed surveys of its services advertising, in accordance with the nature of the group's services and comply with the Consumer Protection Act.

**6. Treatment of business competitors.**

The Group places great importance on treatment of business competitors by conducting business in accordance with the principles of fair competition and free capitalism, complying with relevant rules, regulations and laws, without destroying the reputation of competitors by making bad accusations. This includes refraining from using dishonest means to obtain information about or trade secrets of business competitors and infringement of copyright or intellectual property rights of others.

**Good practices**

- 6.1 The Group operates its business based on free competition. The Group's business practices shall respect fair competition without defaming or assaulting competitors without sufficient justification.
- 6.2 For the sake of its customers, the Group ought to foster collaboration with its competitors. Collaboration between the Group and competitors is not permitted to lead to monopolies that are detrimental to all customers. Directors, executives, and employees shall always use caution when interacting with competitors and shall not divulge or fail to prevent competitors from learning the Group's secrets.
- 6.3 Transparency is required in all mergers and acquisitions between the Group and its business competitors. Following a merger, the Group shall not exercise its market power in a manner that is harmful to all customers.

**7. Procurement and fair treatment of business partners.**

The Group places great importance on all business partners and treat them with fairness, transparency and equality. The Group has policies and criteria for choosing business partners that have the potential to conduct sustainable business, which takes into account reputations, reliable financial records, traceable production of quality products/services that satisfy customers' needs, compliance with relevant laws and regulations, transparency and straightforwardness in equal treatment, as well as strict compliance with the agreements set forth in the contract and the Group's Code of Ethics. In order to develop and enhance the operations in many areas and foster long-lasting connections with each other, the Group also conducts a due diligence investigation on its business partners and informs them of the findings.

**Good practices**

- 7.1 The procurement department shall take into account demand, value, pricing and product and service quality and there were no violations of labor and human rights laws. The selection of business partners shall be made in a transparent manner, in accordance with the regulations established by the Company, without discrimination against partners and with an emphasis on fostering fair competition.
- 7.2 Before the Company enters into the transaction, any director executive, and employee who has a relationship with any of Company's business partner shall notify its supervisor in writing if its relationship with the business partner could lead to unfairness in the course of doing business.
- 7.3 The procurement department or employees involved in the procurement process shall reasonably retain the documents such as approvals, bidding documents, negotiations, contracts, or contract performance as reference evidence.
- 7.4 Executives and employees shall honestly and fairly comply with any contracts or trading conditions made with its business partners. If the conditions cannot be met, the supervisor must be notified so they can get in touch with the business partners to work out a solution together.
- 7.5 Giving or offering of property or benefits to third parties that will result in unfair business practices is forbidden for directors, executives, and employees. This includes refraining from accepting property or benefits from business partners.

**8. Responsibility to the community, society and environment.**

The Group, as a good corporate, aims to enrich the society by adhering to the principles of conducting business with morals and ethics, transparency, fairness while not taking advantage of society. In addition, the Group shall conduct business responsibly to benefit the communities, society and environment for the Group's sustainable growth. To do this, the Group shall place special emphasis on advancement of society, communities, and environment, upholding of religion, creation and conservation of natural resources, including supporting youth education and public benefit initiatives to strengthen self-reliant communities.

**Good practices**

- 8.1 Directors, executives and employees uphold the values of morality, honesty, and transparency in carrying out their duties appropriately.
- 8.2 The Group aims to understand and communicate with societies about the status and facts of the Group's operations, the Group's overall treatment of the communities, society and environment, and cooperates in timely information delivery to shareholders, investors, and other interested parties.
- 8.3 Directors, executives and employees shall be aware of their participation in social responsibility with regard to quality, safety, occupational health and environmental conservation in a serious and continuous manner, use of natural resources for maximum benefit and refrain from actions that jeopardize stakeholders' safety by contaminating resources and the environment.
- 8.4 The Group favors lowering energy and resource consumption and takes into account ways to utilize natural resources with minimal impact on society and the environment.
- 8.5 The Group shall communicate its social responsibility policies in order to foster knowledge and understanding throughout its organization.
- 8.6 Directors, executives, and employees should participate in public benefit initiatives involving development and social services like education, culture, and the environment.
- 8.7 Directors, executives and employees should participate in fostering the communities and providing aids to the underprivileged and those affected by disasters as deemed appropriate.

**9. Treatment of employees / labor.**

The Group attaches great importance to its employees, who are considered valuable resources in the Group's business operations. The Group has established human resource management and labor relations policies to give importance to and treat its employees/labor at all levels in an equal and fair manner without discrimination, since employment, compensation, promotion, and termination of employment. Each employee is expected to treat the others with respect. The rights of employees are upheld in accordance with fundamental human rights principles and relevant laws and regulations. Training course development is continually encouraged and supported. Appropriate compensation is determined based on the knowledge and skills of employees and in accordance to the Company's business performance in both the short and long term. Great attention is also attached to the health, occupational health, safety of life and property and the working environment. A positive working atmosphere is fostered by providing annual employee health check-up benefits, employee/labor group health insurance benefits, provident fund benefits, etc. Additionally, the Group plans events to develop positive connections between employees and between employees and executives.

**Good practices**

- 9.1 Directors, executives and employees should treat people politely and equally without discrimination regardless of nationality, race, class, gender, age, religion, beliefs, social status.
- 9.2 The Group provides opportunities for all executives and employees to express their best abilities by offering suitable pay to foster work motivation in the form of salary, bonuses, and benefits, as well as by promoting and supporting continuous development and training.
- 9.3 Directors, executives and employees are required to carry out their tasks and responsibilities honestly and responsibly with their best effort.
- 9.4 Directors, executives and employees shall work according to the chain of command, receive orders and be directly accountable to their supervisors. Employees at all levels should respect, give their colleagues and subordinates opportunity, and listen to their opinions consciously and reasonably without bias.
- 9.5 Directors, executives and employees shall supervise, pay attention to and follow up on the performance of their subordinates to prevent neglect of duty. Directors, executives and employees should evaluate their subordinates' merit and punish them subordinates in an equal and honest manner in accordance with the established regulations.
- 9.6 The Company's resources, labor, premises, and facilities are all available to directors, executives, and employees for use in carrying out their duties and obligations.

- 9.7 Directors, executives, and employees shall act courteously, dress correctly for the setting, and behave in accordance with their responsibilities and positions without tarnishing the Company's image.
- 9.8 The Group encourages its employees to exercise their legal rights in accordance with labor relations law, excepting any actions that are illegal, unethical, or detrimental to the Company.
- 9.9 For immediate corrective action, executives and employees should notify the appropriate person as soon as they aware of any anomaly that could jeopardize workplace safety.

**10. Treatment of creditors.**

The Group acts as a good debtor by taking into account the best interests of both parties and avoiding situations with possible conflict of interest. The Group has a policy to repay debts on time and strictly comply with the conditions and contracts made with its creditors. The Group respects the interests of its creditors and sees them as business partners. Furthermore, the Group shall not conceal information or facts that harm creditors. The Group shall promptly notify its creditors if any of the requirements cannot be met in order to work out a solution together. The Group is committed to maintaining long-lasting and reliable relationships with its creditors.

Good practices

- 10.1 The Group shall strictly comply with the conditions of the contracts made with its creditors, in a transparent and equitable manner, in terms of payment and any other conditions that have been agreed upon with its creditors.
- 10.2 The Group shall promptly and in accordance with the contractual terms and conditions provide its creditors with correct and complete financial information.
- 10.3 In the event that they are unable to adhere to the terms and conditions of the contract, the Group shall notify its creditors and work with them to find a solution.

**11. Internal control and audit and financial reporting.**

The Group has established a good internal control system and internal audit department that are in line with international standards, based on principles of efficient operation and monitoring, appropriate risk management, accurate and complete accounting and financial reporting and compliance with relevant regulations.

**Good practices**

- 11.1 Directors, executives and employees recognize the importance of risk management and need for strict compliance with risk management policies as well as identifying and reporting the Group's possible risk to their supervisors or the Risk Management Committee.
- 11.2 Under the inspection of internal auditors and review of the Audit Committee, it is the responsibility of the Board of Directors to establish an efficient internal control and audit system to ensure the Group's compliance with relevant standards and laws as well as reporting.
- 11.3 The Company shall have an independent agency directly accountable to the Audit Committee to fulfil internal audit duties effectively, with enough staff, expertise, and skills, and in accordance with the internal auditors' code of conduct.
- 11.4 The Audit Committee is responsible for preparing accurate and complete annual and quarterly financial statements in a timely manner and in accordance with the Generally Accepted Accounting Principles.
- 11.5 Directors, executives and employees are required to strictly and consistently comply with the rules and responsibilities delegated to them in accordance with the authority manual. This includes notifying supervisors of any violations or non-compliance with relevant regulations.
- 11.6 The Internal Audit Function is responsible for monitoring, evaluating and reporting the performance of executives and employees directly to the Audit Committee. Directors, executives and employees shall cooperate with the Internal Audit Function in providing information, documents and evidence used in the audit without concealing, falsifying documents or interfering with the audit.
- 11.7 Directors, executives and employees shall offer their opinions on how to enhance the internal control system to adapt to changing circumstances, environments, and risk factors.

**12. Occupational safety, health and environment.**

The Group has a policy to maintain the safety, occupational health, hygiene of its working environment favorable to effective work and operation.

**Good practices**

- 12.1 The Group has an occupational safety, health and environment policy in which directors, executives and employees are required to comply with relevant laws and policies by attending training on occupational safety, health and environment.
- 12.2 The Group uses all measures to prevent accidents, fires, injuries or occupational illnesses, incorrect work practices and mistakes, as well as maintaining a safe working environment for executives and employees. Rehearsals of safety emergency plan are performed on a regular basis. Executives and the employees are required to report accidents or incidents in accordance with the established procedures.
- 12.3 The Group shall arrange public relations and communication to create knowledge and understanding of policies, regulations, procedures and precautions for occupational safety, health and environment among its directors, executives and employees, employees of contractors as well as relevant stakeholders.
- 12.4 For immediate corrective action, executives and employees should notify the appropriate person as soon as they aware of any anomaly that could jeopardize workplace safety. In this situation, it is totally forbidden for any employee to continue working.
- 12.5 The Group should promote the conservation of resources and energy through efficient utilization and consumption reduction, including waste elimination, treatment, prevention, and control to achieve minimal environmental impact.

**13. Intellectual property, use of information and communication technology and appropriate use of the Group's asset.**

All Group's asset should be used for lawful purposes only. Directors, executives and employees of the Group should take care of the Group's asset to ensure their effective use and compliance with copyright and intellectual property laws.

**Good practices**

- 13.1 Directors, executives and employees shall perform their works and task using computer software with proper copyrights and licenses and shall not violate computer software copyright by downloading or installing any software that is not handled by the Company's Information Technology Department. In addition, all employees shall also conduct routine checks to avoid copyright violations.
- 13.2 In order to prevent unauthorized users from accessing their computers using their passwords, directors, executives, and employees shall keep their passwords private, refrain from disclosing them to others, and refrain from using the internet to visit websites that could damage the Company's computer systems.
- 13.3 The Group encourages its directors, executives and employees to use digital media for work-related purposes only and to refrain from using the Group's computer systems to spread immoral, unethical, or illegal information.
- 13.4 To ensure occupational safety and make the most of the Group's asset, executives and employees shall utilize tools and equipment with caution in an economical manner.
- 13.5 Executives and employees are forbidden from purposefully destroying or damaging the Company's asset. They shall maintain the Group's asset in good condition and avoid causing damage for efficient and sustainable use.
- 13.6 Directors, executives and employees are prohibited from using the Group's asset for their own or others' benefit whether through the use of tools and equipment of the Group for personal business, selling, lending, pawning, mortgaging or disposing the Group's asset without permission, regardless of the condition of the asset.
- 13.7 Employees are required to follow the Group's policies while making purchases, maintaining, and selling the Group's asset.

**Notes**

Asset refers to both tangible and intangible assets such as real estate, technology, academic knowledge, copyright documents, patents, and movable property. It also includes confidential information that has not been made available to the public, such as business plans, financial projections, and human resource data.

**14. Business opportunities.**

Directors, executives and employees of the Group are obliged to support the legitimate interests of the Group as opportunity allows. In addition, directors, executives and employees shall refrain from using the Group's resources, information, and positions for their own personal gain.

**Good practices**

- 14.1 To open up new business opportunities for the Group, executives and employees should introduce customers to various products and services offered by the Group.
- 14.2 Executives and employees shall refrain from engaging in passive behavior with its business partners, competitors, or customers at this may cause result in loss of business opportunities on the part of the Company.
- 14.3 Directors, executives and employees shall refrain from engaging in any action that may hinder or reduce the Group's business opportunities.
- 14.4 Directors, executives, and employees are prohibited from engaging in activities that may hinder or reduce the Group's business opportunities.

**15. Securities trading of the Company's shares and use of inside information.**

In the trading of the Company's shares by directors, executives and employees, such persons shall comply with the requirements of relevant laws, regulations and employee manual.

**Good practices**

- 15.1 Directors, executives and employees are required to thoroughly review and adhere to the Company's guidelines.
- 15.2 Directors, executives and employees shall refrain from using inside information to benefit their trading of the Company's shares. They shall refrain from disclosing inside information to others for the same purpose.
- 15.3 Directors, executives and internal employees should refrain from trading Company's shares before the release of financial statements or the Company's status and other important information. Directors, executives and employees of departments involved in inside information (including their spouses and minor children) are prohibited from trading shares for at least two weeks before the release of quarterly and annual financial statements and should wait at least 24 hours after such release before trading the Company's shares.
- 15.4 Directors and executives are required to give at least one day's notice to the Board of Directors or the Company Secretary before trading any Company's shares.
- 15.5 Directors, executives and employees will receive notifications and campaigns to refrain from using inside information through the Company's contact channels, especially when there are important events such as the issuance of additional shares or debentures. Directors, executives and employees should strictly follow good practices in accordance with the Company's Good Corporate Governance regarding the use of inside information.
- 15.6 Directors, executives and employees are obliged to prevent the use of inside information by limiting access to undisclosed information. Such information shall be disclosed only on need-to-know basis.
- 15.7 Directors, senior executives and managers or equivalent in the finance and accounting department have a duty to report changes in the holding of the Company's shares to the Company Secretary according to the criteria set by law in order for the Company Secretary to produce a report to the Board of Directors.
- 15.8 Directors, executives and employees are not permitted to take advantage of inside information even after leaving their positions or their employment with the Company is terminated.

**16. Receiving/giving gifts, property, or any other benefits.**

The Group conducts its business in accordance with the principles of good corporate governance, ethics, and transparency standards, treats related parties and stakeholders equally, and avoids actions that may lead to discrimination or conflict of interest.

**Good practices**

- 16.1 Under no circumstance shall directors, executives and employees accept or give gifts/souvenirs from/to third parties in the form of cash, checks, bonds, shares, gold, gems, real estate or similar items.
- 16.2 Under no circumstances may directors, executives, or employees accept gifts, property, or any other benefits. They also have a responsibility to make other parties, including clients, partners, contractors, customers or those involved with the Company's business aware of the Company's gift policy.
- 16.3 Directors, executives and employees are prohibited from illegally demanding to take or promising to accept gifts, presents or any other benefits from contractors, subcontractors, customers, partners or those involved with the business as an inducement to act or omit any action. Receiving gifts, presents, or any other benefits is acceptable if they are for a special and seasonal occasion and are not against the law and are at a reasonable price. The giver and/or recipient shall fill the "Gifts, Property or Any Other Benefits Acceptance Form" and send it to the authorized person for approval and then send it to the office of the company secretary along with the received items for inspection.
- 16.4 Under any circumstance, directors, executives, employees and their families are prohibited from demanding or receiving gifts, property or any other benefits from contractors, subcontractors, customers, business partners or those involved with the Company's business as doing so might bias their decision-making in performing duties or cause them to feel uncomfortable or create a conflict of interest.
- 16.5 Directors, executives and employees shall not offer bribes or any other benefits of a similar nature to government officials. Giving gifts, property, or any other benefits to government officials must not be against the laws and customs.
- 16.6 Business entertainment and other expenses directly related to the performance of business contracts are acceptable but they must be reasonable.

**17. Anti-corruption**

The Group has established an Anti-Corruption Policy against both direct and indirect corruption of all form. The Group shall not tolerate any corruption-related action or behavior and shall adhere to the principles of Good Corporate Governance. To ensure that all directors and employees adhere to and take into consideration the best interests of the Group, the Company also places a high priority on developing and fostering a culture of good corporate governance within its organization.

The Group has the Whistleblower Policy by giving stakeholders and employees the opportunity to report or provide information on any irregularities in the Group's business operations in regards to transactions, finances, compliance with the laws, regulations or business ethics through specified whistleblower channels. This is to ensure that the Group will treat the information obtained as confidential and provide protection to the informant in good faith.

**Good practices**

- 17.1 Directors, executives and employees of the Group are prohibited from carrying out or accepting or supporting any form of direct or indirect corruption. It also applies to all affiliates, contractors or other related subcontracts. In addition, the Group has decided to regularly review the compliance with this Anti-Corruption Policy as well as review the consistency between its practice guidelines and policies, rules, requirements, regulations, announcements, laws and business changes.
- 17.2 Anti-corruption standards are integral part of business operations and, in order to carry out anti-corruption operations in accordance with the specified policy, it is the responsibility of the Board of Directors, executives, supervisors, employees at all levels, suppliers, or subcontractors to participate in expressing their opinions about practices.
- 17.3 The Company has developed anti-corruption measures in accordance with relevant laws and Code of Ethics such as conducting risk assessments in activities connected to or at risk of corruption, creating practice guidelines for those involved, as well as monitoring, evaluating, and reporting results to the Audit Committee on a regular basis. However, if there is any violation which encourages, assists or actively participates in corruption-related action or behavior, punishment shall be imposed according to Company' regulations.
- 17.4 The Group does not engage in or support any form of bribery. All actions under the Group's purview, such as the regulation of charitable contributions, contributions to political parties, and business gifts, are transparent and open to the public and have no intention of influencing public or private officials to take any inappropriate action.

- 17.5 The Group constantly implements necessary internal controls to prevent its employees from improper practices, particularly in procurement, spare parts and equipment inventory management, and delivery.
- 17.6 In order to strengthen their knowledge and understanding of anti-fraud and anti-corruption, the Group offers training to the Board of Directors, executives, and workers. This is done with the hopes of promoting honesty and integrity in their performance and responsibilities as well as demonstrating the Group's commitment.
- 17.7 The Group arranges transparent and accurate mechanisms for reporting its financial status.
- 17.8 The Group organizes and supports a number of whistleblower channels for employees and stakeholders. The Group also ensures that the whistleblowers disclosing suspicious information in good faith will be protected from unreasonable punishment, unfair transfer or bullying of any form. Every reported clue will be the subject of an investigation and follow-up by a person appointed by the Group.

Contact channels

- Mail: Chairman of the Audit Committee  
Sahathai Terminal Public Company Limited  
51/1 Moo 3, Poochaosamingploi Road, Tumbon Bangyaprak  
Prapradang, Samutprakarn 10130
- Telephone: 02-386-8000 ext. 1888 (Company Secretary)
- E-mail: [anticorrupt.sst@sahathaiterminal.com](mailto:anticorrupt.sst@sahathaiterminal.com)
- Website: <https://sahathaiterminal.com/whistleblowing/>