

# Code of Conduct



**Grandline Innovation Company Limited**

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## **1. Introduction**

### **1.1 Meaning and importance of code of conduct**

Business code of conduct means rules, guidelines, or frameworks for conducting business. Code of conduct has been established by the organization to serve as a moral standard. It can be in written form or non-written form. Today's business operations focus on management for sustainable growth. Therefore, the goal of the organization is not only maximizing profits, but also need to have responsibility for economic, society, environment, legal, and business ethics including all groups of stakeholders as a basis for sustainable growth.

### **1.2 Objectives of the Code of Conduct Manual**

This code of conduct Guide is established in writing and published for both internal and external use of the organization. It is available through the website of Grandline Innovation Company Limited ("the Company") with the objective to

1. demonstrate our commitment to conduct business under the code of conduct, honesty, fairness, transparency, rules, and social responsibility.
2. become the principle and guideline for the operation of all personnel at all levels of the company.
3. be a communication tool for all personnel at all levels in the company by acknowledge code of conduct, behavioral framework, guidelines, and even penalties for those who violate the code of conduct
4. serve as a criterion for analyzing risk and impacts when the company encounter ethical challenging situation.
5. serve as a criterion for supervision and follow up to ensure compliance with the Code of Business Conduct including maintaining Code of Conduct.
6. be a guideline for reporting violations of the Code of Conduct, bribery, and corruption under a secure communication channel, including protection for whistleblowers.
7. Serve as a criterion for penalizing those who violate the Code of Conduct Manual with the principles and without prejudice.
8. Enhance understanding and create awareness of business ethics.
9. Create a corporate culture that promotes ethical values which shows honesty adherence to the law and responsibility to all groups of stakeholders to be a role model.

### **1.3 Scope**

This Code of Conduct applies to all directors, executives, and employees of Grandline Innovation Company Limited without exception.

#### 1.4 Roles and Duties

1. The Board of Directors has assigned the Internal Audit Department who is responsible for overseeing compliance with the Code of Conduct. To ensure that the company and all employees are doing business with the established business ethics.
2. The Board of Directors has assigned the Internal Audit Department who is responsible for reviewing the contents of the Code of Conduct at least once a year, in consultation with relevant persons or agencies to improve the content and guidelines in the Code of Conduct manual.
3. Company Directors and Executives have a duty to communicate and enforce the Code of Business Conduct along with supervise subordinates to follow with the Code of Business Conduct. They also need to raise awareness and encourage employees to receive regular training.
4. All employees have a duty to study and understand and comply with the business ethics. In case of business ethics violation, employees are obliged to report through the whistleblowing channels set out in clause 11.2.

#### 2. Vision, Mission and Core Values

To be understood in the same direction that will lead to achieve the organization's objectives, the company has set the Vision, Mission and Core Values as follows

<b>Vision</b>	We strive to be a leading company in delivering innovations and modern technology to improve the country's infrastructure.
<b>Mission</b>	We have a strong commitment to bring innovation for the highest satisfaction to customers continuously in accordance with good governance for sustainable growth for every party. And we are promoting to become an innovative organization by increasing the capacity of personnel to be curious and willing to learn new thing to perfect our professional service and strengthen our business.
<b>Core Values</b>	Globalization - Be a respectable company in the international stage. Learning- Learn the best practices for continuously growth. Innovation - Creates quality innovations for the benefit of customers.

#### 3. Code of Conduct

The Company is committed to “do the right thing” as a guideline for its business operations. Code of Conduct is for everyone in the company to use as a guideline to work with honesty and fairness to the company and stakeholders as follows:

### **3.1 Responsibility to Stakeholders**

#### Shareholders

Compliance with the principles of good corporate governance, the Company is committed to treat every shareholder equally by providing quality information and encouraging shareholders to attend the shareholders' meeting to be involved in making important decisions as well as to acknowledge the operations and activities of the Company. Shareholders will also be able to monitor the performance of the Board of Directors and the Management team. The company also provides safety measures to prevent the use of inside information for the personal benefit of the Board of Directors and the management to protect the interests of shareholders and does not take any action that violates or deprives the rights of shareholders.

#### Customers

The company is committed to create long last customer satisfaction, provide reliable and fast services according to standards and always listen to customers' feedback. The Company is focusing on continuously and consistently improves the service quality. To illustrate, there are customer satisfaction survey to use the results to improve the service. In addition, to deliver quality products and services, the company also develop personnel's attitude and skill by providing our staff trainings before starting their duty and additional skills training, and knowledge sharing. We work continuously for our customers to receive excellent services.

#### Partners

The company places importance on the procurement process since this process can determine costs and quality of the product. Therefore, there must be procedures for transparency, accountability. The Company treats its business partner equally with fair competition and respect because we realize the importance of our partners one who could help us driving the business forward.

#### Creditors

The Company know the vitality of managing project budget and creditors who is an important part in supporting the company's business. Our projects can be carried out successfully by the company strictly in the payment of service fees or the cost of goods purchased from all trade creditors on time without consideration whether they are large or small creditor.

#### Business Competitors

The company consider their business competitors not only as a competitor but also an opportunity to form a new business partner in the future. Therefore, the Company emphasis on fair treatment of business competitors.

The Company has a policy to treat its business competitors in accordance with international principles under the legal framework of trade competition practices by not infringing on the confidentiality or knowing the trade secrets of trading partners by fraudulent means the guidelines are as follows:

- 1) Behave within the framework of good competition rules.
- 2) Do not seek confidential information of competitors by dishonest or inappropriate means.
- 3) Do not damage the reputation of competitors by making false accusations.

#### Employees

The company realizes the importance and value of our staffs. The company is supporting and encouraging employees to perform their duties with the highest efficiency by providing outstanding employment conditions, opportunities for career growth. The Company will treat all employees equally without discrimination on race, sex, religion, origin, age, sexual orientation, physical disability, or personal characteristics which are not related to performance and will make extra caution not to cause harassment or intimidation to personnel at all levels from any person or by any means.

#### Society and Environmental

##### 1) Society

The Company is ready and already hired workers from the community to distribute income to the local community. The company also make sure that there is high level safety in our projects to protect the local and the community. It also promotes activities that contribute to society in which everyone in the company participates.

##### 2) Environment

The Company has a policy to protect the environment by promoting, supporting, and encouraging employees to save electricity, water supply and maximize resource utilization. For example, by turning on electricity as needed, turning off the power in places where it is not needed during breaks and after work, always making sure to turn off the water tap after use. Moreover, the company are targeting to reduce our paper usage by using both sides of paper or making it in electronics forms. Our waste management is also promoting and encouraging our employees to sort wastes and dispose them into the correct bin.

### **3.2 Occupational Health and Safety Responsibilities**

#### **Health**

The Company concerns regarding health and sanitation for our employees. The company is having a policy to have an annual health checkup, vaccination, and insurance for medical expenses. The company also promotes sporting in the Company to keep our employee fit and healthy.

### **Operation safety**

The Company provides a safe, hygienic working environment to reduce the risk of accidents. The company also provide the right and sufficient equipment to prevent accidents and unexpected event. We also have regular training including a business continuity management plan for supporting emergency situations or catastrophic events that may occur.

## **3.3 Labor responsibility and human rights**

### **Determination of compensation and benefits**

The company gives importance to all employees, regardless of their work, and treat all employees equally. Therefore, there is an important policy in providing appropriate compensation and welfare for all employees who is working with dedication for the benefit of the company including setting policies and responsibilities for employees and creating a good working atmosphere. This will make all employees work together in harmony and create better outcome.

However, the compensation and benefits of each employee may differ in detail. This different depends on performance, knowledge, skills, duties, and responsibilities. However, the company assures all employees that they will receive adequate and fair compensation and benefits.

### **Personnel Training and Development**

The Company value the importance of personnel development. The Company know the necessity to develop knowledge, skills and making sure that our employees has reach their highest potential regardless of their level or their works. The reason is that we believe in business success is creating by increasing ability to perform their duties. This will create competitive advantages in the long run and with continually both internally and externally training along with knowledge management for personnel and exchanging experience through a variety of channels.

### **Practices on Respecting Human Rights**

The Company operates its business with an emphasis on the rights and freedoms of individuals. The company will not violate human rights by following the law and regulations related to employees and principles on basic human rights in accordance with international criteria and treat all persons related to the Company at all levels and in all aspects with equality. The Company strictly complies with labor laws and additional benefits beyond the law according to their abilities and responsibilities without discrimination.



### **3.4 Responsibility for relevant regulations and laws**

The Company complies with all relevant laws, and regulations by directors, executives, and all employees. They must have knowledge and understanding the laws related to their duties and take responsibilities thoroughly. The company also act strictly within the framework of laws and regulations. The company will not involve in any of acknowledging, helping, or taking any action which could infringe or violate law, and regulations.

### **3.5 Practices on Non-Infringement of Intellectual Property or Copyright**

The Company acknowledge the issues of intellectual property consider it as the company's main policy not to promote or support, directly or indirectly, the use of any software that infringes the intellectual property of another person. The company provides guidelines for all employees to sign an acknowledgment of corporate policies related to the use of computer software and prohibit employees from doing anything which violate any intellectual property and/or committing an offense under the Computer Crime Act B.E. 2550 and No. 2 B.E. 2560 (2017)

### **3.6 Practices related to the use of information and communication technology**

The Company realize the great importance the usage of information technology and communication. The company has defined the security measures on information to prevent and reduce the chance that sensitive or confidential information will be intentionally or unintentionally released.

In addition, the Company is taking a serious action regarding intellectual property issues and is considered as the main policy of the Company for using only the copyright version of software within the company. Therefore, the company has a policy not to promote or support, directly or indirectly, the use of any software. that infringes the intellectual property of another person as stated in clause 3.5 above.

### **3.7 Creating and disseminating innovations**

The company has a policy to create quality, and creative innovations to offer to customers. It also has a mission to devote of creating intelligent innovation and is committed to promote being an innovative organization as well as pushing the product to be registered in the Thai innovation account.

## **4. Conflict of Interest Policy**

A conflict of interest is where a person gains a benefit from his or her decision, by using performance of duties in the company or recognition of operational activities or the company's future as a result, the decision to take any action of that person does not consider the best interests for the Company.

In order to prevent potential conflicts of interest, all personnel at all levels should avoid financial involvement and relationships with other people which may result in conflicts of loyalty or hinder the efficient operation and decision making. All Personnel should be free from the influence of others, family, or close personal needs.

The Company has established guidelines for all employees for consideration appropriateness of transactions that may have conflicts of interest and to clearly prevent conflicts of interest issue such as procedures for approving connected transactions, formulating policies and procedures to prevent the Board of Directors, executives, and related persons from using the Company's internal information for personal benefit. If the Company has found any items that may have conflicts of interest, The Audit Committee will present to the Board of Directors for acknowledgment of transactions that may have conflicts of interest and connected transactions as follows:

#### **4.1 Receiving money or benefits**

Personnel at all levels should not accept any personal gifts or money or offers directly or indirectly from anyone while working on behalf of the company since this may lead to being in a situation that creates a conflict of interest.

#### **4.2 Other business operations outside the Company and having relationships with those involved in trade**

Employees at all levels are prohibited from doing any personal business which is a competition with the business of the company or undertake any work for business partners, competitors, customers, or potential customers of the Company who in the future can benefit directly or indirectly that affect decision-making and performing duties for the organization.

#### **4.3 Disclosure of interests**

In agreeing to enter a business transaction or any action if any employees have a stake in the said transaction whether it is a direct or indirect benefit, they must inform the Company before making such transaction to prevent conflicts of interest issue. This also includes doing other business, investing, holding material shares in other businesses which are partners, competitors, customers, or potential customers of the Company.

#### **4.4 Directorship in other companies**

Directors, executives, or employees who is holding directorships in other companies or to hold a director position in other companies must inform the Company except for serving as a director in a non-profit charity organization. The reason is that the directorship in other companies shall not be contrary to the provisions of the law or regulations in the company's business operations and must not use the position in the company to be used in reference to outside business operations.

#### **4.5 Use of inside information and trading in the Company's securities**

All directors, executives and employees at all levels must comply with the best practices for handling confidential information that affect Company's share prices. The Securities and Exchange Commission (SEC) does not allow to use inside information that is material to changes in the Company's securities prices that have not yet been disclosed to the public to seek profit or personal benefit whether directly or indirectly. In addition, the company has established a policy on the use of inside information which are detailed as follows

- 1) Board of Directors, Executives, and Employees must maintain confidentiality of internal information of the company.
- 2) The Board of Directors, executives, and employees must not disclose confidential information or internal information of the Company to seek benefits for oneself or for the benefit of third parties whether directly or indirectly and whether a return is received.
- 3) The Board of Directors, executives, and employees must not trade securities using secrets or inside information of the Company and enter any other juristic act using secret or internal information of the Company which may cause damage to the Company directly or indirectly.
- 4) The Company emphasis that the Board of Directors and executives are responsible for reporting changes in securities holdings to the Office of Securities and Exchange Commission under Section 59 of the Securities and Exchange Act B.E. 2535 (1992) and the use of inside information for personal benefit punishable as specified in Securities and Exchange Act B.E. 2535.

#### **4.6 Providing information or give an interview to the press or to the public**

The dissemination of information to the public must be approved by the managing director and the Managing Director must explain or assign someone to provide information or answer questions. If it is information about other party in any joint venture project, it must be approved by the joint venture with a central agency that provides information to the public, including Corporate Communications and Investor Relations Section, which has an internal unit responsible for informing employees. The central authority that owns the data is responsible for providing the details and coordinate information with the Managing Director and the chief financial officer before it can be published.

#### **4.7 Connected Transactions in the Group**

The Company has guidelines for considering the appropriateness of related transactions among the group of companies by the committee. The Audit Committee will always present to the Board of Directors regarding conflicts of interest and connected transactions. It has been carefully considered by the Audit Committee every time include complying with the rules of the market Securities by setting prices and conditions similar to transactions with third parties (Arm's Length Basis). Significant connected transactions will reveal details, transaction values, counterparties, reasons and necessities of the transactions.

#### **4.8 Giving or accepting gifts and business entertainment**

Spending on Business Entertainment and other expenses related to the performance of business contracts can be done, but at a reasonable cost and can be examined.

All employees must not demand, nor receive bribery or bribes to stakeholders in matters for which they are directly or indirectly responsible for obtaining unlawful benefits. The details are in accordance with the anti-corruption and corruption policy.

#### **4.9 Charitable donations and support**

Donating money or assets of the company to support various projects must specify the name to support on behalf of the company only. The Purpose of the donation can be for the business objectives, improve public image and create good reputation of the company. However, clear process and verifiable evidence must be proceeded through according to the company's regulations only.

### **5. Anti-Corruption and Corruption Policy**

Directors, executives, and employees of the Company are prohibited to carry, accept, or support corruption in all forms both directly and indirectly. With the anti-corruption policy, if anyone see an action that is considered fraud or lead to corruption, that incident must not be ignored. The notification must be made through the whistleblowing channels specified by the company.

### **6. Anti-Money Laundering Policy**

The Company prevents directors, executives and employees from misconduct action related to money laundering, terrorism or other financial crimes by ensuring that employees who are directly related to customers and handle customer transactions have follow this policy to prevent money laundering and financial support for terrorism.

### **7. Political activities**

All directors, executives and employees must not act in any way related to political activities within the Company and do not use any resources of the Company to support such actions. The Company is an organization that decide to be neutrality in politics, support legal compliance and democratic governance including no guidelines for providing political assistance to any political party whether it is direct or indirect support.

## **8. Protecting the Company's Interests and taking care of the Company's assets**

Directors, executives, and all employees are responsible of taking care of the Company's assets for maximizing benefit, saving and by not using it for personal benefit. In addition, it is critical for all personnel not to unauthorized disclose the company's confidential documents or information.

## **9. Confidentiality Policy data retention and use of inside information**

The company is committed to maintain confidentiality, data retention and the use of inside information. The details are as follows.

1. Require the company to provide knowledge and understanding to Company's directors and executives regarding the report of securities holdings and changes in the Company's securities holdings to the SEC in accordance with Section 59 of the Securities and Exchange Act B.E. 2535. They also need to inform the relevant persons for further acknowledgment including notifying the penalties if there is a violation or non-compliance with the said requirements.
2. Assign executive directors, directors, and executives (as defined by the SEC) who are responsible for reporting the Company's securities holdings. First time being appointed as a director or whenever there is a change. This includes the number of securities held by related persons under Section 59 of the Securities and Exchange Act. The company secretary also requires summarizing the report of securities holding and changes in securities holding to every Board of Directors meeting for acknowledgment on a quarterly basis.
3. State in the employment contract regarding the company's code of conduct, rules and work ethics for employees to the Company and considered as the ethics of employees and be careful to keep the information confidential, and make sure that they are not using the position in the company which has not yet been disclosed to the public to exploit or disclose to third parties for personal gain and those involved or affect the benefits of the company or create a conflict of interest.
4. Focus on protecting customers confidential information without using such information for the benefit of oneself or those involved unless it is the information that must be disclosed to third parties under related laws.
  - In the case of outsiders involve in the work related to information that has not yet been disclosed to the public or in the negotiating process that work is considered internal data which may affect the movement of the Company's securities prices. Those third parties are required agree on Non-Disclosure Agreement (NDA) with the Company until the information is disclosed to the SET and the SEC.
5. Set policies and guidelines regarding the use of information technology and communication are in the Article 3.6 for the control and security of information in information systems and prevent unauthorized access to company and authorizing the level of access to the company's information to employees as see appropriate.

6. The Company will use penalties according to the Company's regulations if any company personnel or related persons have used inside information or behave in a way that may cause the damage to the company.
7. In the event that inside information is used or there is any action or events that imply that the Company reputation has been damaged, the management team will prepare a report to present to the Board of Directors annually.

## **10. Internal Control and Internal Audit Policy**

The Company is implementing the internal control system at both the management and operational levels by having an internal audit department to audit company's operations and important activities that have carried out whether they are follow guidelines. This also include checking compliance with laws and requirements related to the Company and to enable the internal audit department to be independent and able to perform full checks and balances. The Board of Directors requires the Internal Audit Department to report the audit results directly to the Audit Committee as well as receiving performance appraisals from the Audit Committee.

The Board of Directors annually assesses the sufficiency of the internal control system in all 5 areas which are internal control, risk assessment, operational control, Information and communication systems, and monitoring system. The Company provides sufficient resources to carry out these specified objectives to ensure that the company has appropriate internal control system. All these steps are required to ensure the supervision of the Company's operations to be transparent and in accordance with the principles of good corporate governance.

## **11. Supervision of compliance with the Code of Conduct**

### **11.1 Guidelines for enhancing business ethics**

1. The company has prepared a written code of conduct and distribute them throughout the organization for all employee to understand and consider it as a company rule.
2. The Company has designated the Internal Audit Department to be responsible for overseeing this Code of Conduct
3. The company instills the values of the organization and create an organizational culture that promotes values as follows:
  - a. The management team is the one who is setting themselves as a good role model in morality and ethics.
  - b. Enhance and create awareness of morality and ethics through organizational knowledge management such as gathering knowledge on morality and ethics is one of the main topics that all employees must follow.

4. Create operational guidelines for ethical problems such as receiving complaints investigation, protection for complainants and penalties under Article 11.2
5. There is audit process, internal control assessment, and assessment of compliance with the Company's Code of Conduct annually to ensure that the organization continues follow the Code of Conduct according and the established according to Clause 10.

## **11.2 Reporting non-compliance with the Code of Conduct and Complaint Channels**

### **Complaint Policy (Whistleblower Policy)**

#### **Objectives for receiving complaints**

1. To be a channel for stakeholders including employees to report any illegal actions or behaviors that suggest corruption or misconduct by individuals in the organization or make complaints about violations of corporate governance and business ethics to the investigative committee.
2. To have guidelines for solving complaints fairly with strict, clear and verifiable procedures according to a good corporate governance, business ethics, and regulations of the company.
3. To use the complaint information to improve operation and performance quality as well as to prevent problems that are expected to occur in the future.

#### **Complaint Receipt Procedure**

##### **1. Complaint Channel**

Complaints can be reported directly to the internal audit department of the Company or through the channels for receiving complaints that the Company has provided as follows:

- 1.1 Call the Internal Audit Department at 02-539-6884 (during business hours)
- 1.2 Comments box provided in a public place at the office area on the 1st floor.
- 1.3 email at [cg@gli.co.th](mailto:cg@gli.co.th)
- 1.4 Channels for reporting complaints on the Company's website [www.gli.co.th](http://www.gli.co.th)
- 1.5 by post to  
Chairman of the Audit Committee and/or Chief Executive Officer  
Grand Line Innovation Company Limited  
333 Ladprao 64 Intersection 12, Wang Thong Lang,  
Wang Thong lang District Bangkok 10310
- 1.6 Complain directly through the internal audit department.

## **2. Complaint Process**

- 2.1 The Internal Audit Department will ask for information from the complainant. The complainant can file a complaint anonymously if the complainant does not wish to reveal his/her identity. The Company will consider and examine the evidence as it appears. The consideration of receiving complaints is at the discretion of the Company and the importance of complaints. If the company consider that the complaint is important and is reasonable, the Company will solve the issue by following the procedures specified by the Company.
- 2.2 In case the complainant wishes to inform the name and surname, the internal audit will record the name, surname, address, and telephone number of the complainant to confirm the identity of the complainant in the complaint form. In this case, the complaints will be considered and solve problems faster than in the case of choosing not to reveal their identity because the company is able to investigate or search for relevant evidence from relevant agencies or persons.
- 2.3 The Internal Audit Department will conduct a preliminary examination of information with the departments or systems related to the complaint within 7 working days from the date of receiving the complaint. Then report the results to the Chief Executive Officer. If the complaint is truthful and material, The Chief Executive Officer will appoint executives and the manager of the internal audit department to act as the investigation committee to resolve the issue within 7 days from the date of appointment of the investigation committee. The manager of the internal audit department will then present it to the Chief Executive Officer for consideration and approval of the investigation results and complaint resolution measures. After that, the complainant will be contacted to report the result of the resolution of the complaint within 3 working days from the date the complaint has been rectified. The period does not exceed 30 working days from the date of receiving the complaint.
- 2.4 In the event of force majeure, the consideration of solving the issue might take more than 30 business days. The Company will notify the progress in writing to the complainant every 15 working days from the end of the 30-day period.
- 2.5 The Internal Audit Department collects complaints and reports to the Audit Committee at the Audit Committee meeting on a quarterly basis.
- 2.6 In case the Company has examined and found that the complaint is the truth and is an act that against the law, regulations, Good Corporate Governance, the Company's business ethics or significantly negatively affects the image, reputation, or business operations of the Company. The internal audit department will immediately report to the Audit Committee.



**Measures to protect whistleblowers and complainants**

The Company has a policy to protect employees or third parties who report complaints, give clues regarding activities that against the laws, regulations, business codes of conduct, fraud, inaccurate financial reports, the system error, or fault in internal control. The Company has established measures to protect whistleblowers and complainants.

The whistleblower and the complainant can choose to remain anonymous. Information about whistleblower and complaints will be kept confidential. The Company will appoint executives and the manager of Internal Audit Department who is directly responsible for the processes involved in the audit and resolve such complaints and will not disclose the names of the whistleblowers, the complainants or the persons cited as witnesses unless it is disclosed to the person having the authority to investigate. For the efficiency and speed of the relevant action, therefore, the information of the whistleblower or the complainant will be known only to the Audit Committee, Chief Executive Officer, and the manager of the internal audit department. For whistleblowing information and complaints related to senior management of the Group of Companies, the whistleblower information will be known only to the Audit Committee and manager of Internal Audit Department to prevent unfair acts against employees, or persons who report clues or complaints to the Company.

In addition, it is forbidden for the company to act as an unfair treatment towards employees or any person who is employed by the Company whether it is a change in job position behavior or the place of work, suspension, threaten, interfere with work, terminate employment contract, or do any other which is characterized as an unfair treatment under Section 89/2 of the Securities and Exchange Act B.E. 2535.

**Penalties**

Company Code of Conduct is considered a rule that directors, executives, and employees of the Company Group must be strictly followed. Failure to comply or act in violation of any Code of Business Conduct which causes the group of companies damaged or lost business opportunities, those who do not comply or those who violate it must be subject to disciplinary action in accordance with the Company's work regulations on disciplinary action It may also be considered an offender under the Securities and Exchange Act B.E. 2535 as well.

The company prohibits employees or any person who accuses or makes a false statement that causes damage to others. If the Company finds that filing a complaint or whistleblowing or providing any information with evidence proving that this is an act with dishonest intent, falsehood, and intentional damage false reporters will be subject to disciplinary action as stipulated under the Company's personnel management regulations.

**Follow-up to ensure compliance**

1. Is the duty and responsibility of the Board of Directors, executives, and all employees to acknowledge, understand and strictly comply with the Code of Conduct.
2. Establish guidelines for recognizing those who follow to the Code of Conduct and punishing those who violate them, such as rewarding those who perform well, disciplinary action against violators, etc., to encourage the Code of Business Conduct.
3. Establish channels for asking questions related to compliance with the Code of Conduct including whistleblowing or complaints related to violations of the law, regulations, Good Corporate Governance, Policy business ethics in multiple channels such as supervisors, Legal department, Manager of Internal Audit Department, email, or via the company's internal website
4. Assign the manager of the Internal Audit Department to directly report the follow-up information to ensure compliance with the Code of Business Conduct to the Audit Committee.
5. Required to review the business ethics annually to be suitable for the business environment and comply with various regulations which may change

This Code of Conduct Manual was approved by the Board of Directors on 11 August 2021.

(Mr.Ormsin Chivapruck)

Chairman of the Board of Directors  
Grandline Innovation Company Limited