

## Translation Version

### Code of Conduct<sup>1</sup>

To comply with the Good Corporate Governance Policy of nForce Secure Public Company Limited ("the Company"), the Company has established ethical standards for executives and employees to uphold and comply with. These are in addition to the Company's regulations and rules that ensure the transparency of management and operations are distinct, fair, efficient, and with honor and dignity, as well as trustful and reliable towards trade partners, customers, and employees. The contents are covered by the following matters:

#### 1. Business Ethics

The Company will perform and supervise the employees involved in the business operation per the following business ethics:

- (1) Conduct the business with honesty and integrity and operate the business by taking social responsibility into account both legally and ethically, and commit to doing good to individuals, community groups, society and the environment.
- (2) Treat customers fairly and without discrimination in terms of products and services.
- (3) Conduct the business with a standardized operating system and good control by bringing knowledge and capability into best practice with carefulness and sufficient information as well as with referable evidence, including strictly adhering to relevant laws and regulations.
- (4) Perform non-disclosure of customer information that one knows from conducting business, which such information is normally reserved for confidential non-disclosure, unless it is the legal duty to disclose such information.
- (5) Allow customers to complain about the defective products and services.

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<sup>1</sup> บริษัทจะปฏิบัติตามข้อกำหนดที่ออกตามกฎหมายว่าด้วยหลักทรัพย์และตลาดหลักทรัพย์ รวมถึงกฎเกณฑ์ ข้อบังคับ และประกาศที่ออกตามความในกฎหมายดังกล่าวโดยหน่วยงานที่เกี่ยวข้อง ภายหลังจากที่บริษัทเป็นบริษัทจดทะเบียนในตลาดหลักทรัพย์แห่งประเทศไทยแล้ว

- (6) Disclosure of information regarding products and services must be conducted accurately and comprehensively.
- (7) Fairly conduct business with customers per the terms and conditions. If it is impossible to comply with such terms or conditions, notify the customers promptly to seek a solution together.

## **2. Code of Conduct for Executives**

Executives must conduct themselves in compliance with the rules, regulations, announcements, and orders of the company as well as orders of superior level supervisors, namely:

- (1) Must support the company's policies and conduct in compliance with rules, regulations, orders, agreements, announcements, or circular letters that are strictly announced to all employees.
- (2) Must perform duties honestly and fairly and promptly report any incidents that may affect the company's reputation or assets.
- (3) Must be courteous, honorable, and respectful toward co-workers.
- (4) Must perform duties with determination, diligence, and perseverance according to the Company's rules, regulations, and good governance to be a good role model for employees and the Company to progress and operate righteously.
- (5) Must maintain the interests and confidentiality of the customer's company or concerning any business. The dissemination of information about the Company's financial business and individuals must be done following the appropriate guidelines and with care and efficiency. In this regard, all employees agree to keep confidentiality both during and after their employment with the Company. If such information is disclosed, transmitted, or used for purposes other than carrying out Company duties, the employee agrees to be liable for all actual damages and to compensate the Company.
- (6) Perform to the best of their abilities to assist surveillance and protect the Company's assets from any person or disaster, including not bringing any of the

Company's items, whether equipment or assets, for personal gain or the benefit of others that are unrelated to the Company's business operations.

- (7) Manage the business by adhering to morality and ethics, including promoting morality and ethics at all levels of the Company, as well as monitoring and managing conflicts of interest that may arise in the Company.
- (8) Closely supervise the subordinates in a fair and impartial manner.
- (9) Must be willing to work as a team and listen to others' perspectives.

Must strictly comply as well as support, control, and supervise the subordinate to adhere to the company's rules, discipline, and regulations in using the computer system, computer data, and company's traffic data for the usage of the company's computers to be following computer law, copyright law, or other relevant laws and to protect the company's reputation and image.

### **3. Prohibited Conduct for Executives**

All executives must refrain from acting or behaving in ways that will bring disgrace to the Company and themselves, specifically:

- (1) Take advantage of the Company's time to do something else or for personal reasons.
- (2) Undertake any business of a similar nature and is a competitor of the Company's business, whether for personal benefit or others or being a shareholder who dominates management, which may directly or indirectly damage the Company.
- (3) Behave in a way that may disgrace the Company's position and dignity.
- (4) Report or use false statements or conceal facts that should be reported to the Company.
- (5) Working with negligence and committing any act that is inappropriate for the performance of good executive duties to complete the job properly and honestly.
- (6) Conceal or misrepresent the truth in order to gain benefits for oneself or others which may cause damage to the Company whether directly or indirectly.

- (7) Obstruct or interfere with the legitimate performance of the Company's authorities in any way, or issue orders for employees to act inappropriately or in an unethical manner.
- (8) Commit a civil or criminal law violation that causes harm to oneself or others, whether intentional or unintentional.
- (9) Disclose one's own or others' wages or salaries, including the rate of salary increase, whether intentional or unintentional.
- (10) Request or agree to receive any property or other benefit from any customer, merchant, trade partner, competitor, or other person doing business with the Company or entertainment that proves to be unreasonable. Except for traditional gifts or normal business entertainment or expenditures on business promotion, which bring a commercial reputation as traditionally exchanged, per the policy of giving or receiving gifts and disbursement of entertainment expenses.
- (11) Bribery, whether directly or through a third party and/or using improper influence on state representatives, customers, or trade partners, is considered a violation of the Company's policy.
- (12) Addition, deletion, or alteration of any record or data in any way to change or distort operating performance, as well as intentionally falsifying accounting records for any reason.
- (13) Make a payment or conduct business to make it known that a portion of the payment or business arrangements is for purposes other than those stated in the payment or business management documents.
- (14) Being an insolvent person or have reasonable cause to be believed as an insolvent person.
- (15) Failure to maintain the Company's intellectual property information or information obtained from employee performance.
- (16) Imitating others' work and intellectual property.
- (17) Any acts of exploitation performed for one's own or other people's benefit.

- (18) Allow non-purchasing agencies to reach out to vendors or trade partners for assistance. If such assistance is needed for the Company's benefit, various departments should consult with the procurement department to put them in charge. This excludes organizing joint marketing activities, for which the marketing and business development departments will be in charge.
- (19) Action that neglects or facilitates any person seeking benefits, or unlawfully or without permission from the company, accesses or disrupts the company's computer system, computer data, or computer traffic data, or intentionally encourages it to occur; or there is wrongdoing by the provider under computer law, copyright law, or other relevant laws.

#### **4. Penalties for Executives**

- (1) Non-serious violations: The executives will receive a written reprimand describing the nature of the violation, the grounds for the violation, and the opportunity to contest the allegations with their supervisors. If the problem is not resolved, it will be brought to the attention of the Board of Directors, whose decision is final. A warning letter will be issued in the event of a second violation occurring or the failure of the executives to correct the first violation's offense, which will result in severe disciplinary action, including dismissal.
- (2) Serious violations, which include the following: giving or accepting bribery, fraud, disclosure of confidential information or intellectual property of the company to third parties, as well as any action that deteriorates the company's reputation, conceals or fails to report any information, discussions, or important documents to the supervisor, the Company may consider terminating employment without pay and without issuing a written reprimand.

## 5. Code of Conduct for Employees

To enhance the quality and efficiency of work, employees should have guidelines as follows:

- (1) Employees should carry out their responsibilities with honesty, perseverance, and diligence, and they should strive to improve their work efficiency for the benefit of both themselves and the Company.
- (2) Employees should strictly adhere to the Company's rules and work regulations.
- (3) Employees should respect and obey their supervisors who issue orders per the Company's policies and regulations.
- (4) Employees should stand in solidarity and be generous in helping one another rather than engage in conflict, which will harm both other people and the Company.
- (5) Employees should respect each other's rights and dignity and refrain from criticizing or revealing other people's information or stories about their work performance or personal matters in a way that would be detrimental to both employees and the Company.
- (6) Employees should refrain from accepting any gifts that may cause them discomfort in the future while performing their duties. If it is unavoidable, notify the supervisor as soon as possible.
- (7) Employees should not take advantage of their position or the benefits that come with it to seek personal gain for themselves or their party, or conduct business competitively against the company.
- (8) Employees should treat customers and trade partners with honesty and equality.
- (9) Employees should strictly maintain customer, trade partner, and organization confidentiality.
- (10) Employees must immediately report any issues that have come to their attention to their supervisors if such issues have the potential to negatively impact the Company's operations or reputation.

- (11) Employees must take care of the company's benefits and assets in order for them to be in good condition and be fully utilized without being wasted, damaged, or deteriorated prematurely.

## 6. Employee Penalties

Employees who act in a way that creates a conflict of interest with the company must be considered per the organizational structure and work regulations of the company. In this regard, each department must first consider and summarize the matter before submitting it to high-level supervisors and related departments for determination of the offense and specification of the appropriate punishment. However, if the conflict of interest is severe and causes significant damage, excluding the scope of affiliated agency power, then bring the matter to the attention of the Company's administrative department so that they can consider making a decision and determine the next penalty.

### Penalties

- (1) Verbal Reprimand
- (2) Written Reprimand
- (3) Cut Wages
- (4) Furlough
- (5) Dismissal without compensation under the Labor Protection Act
- (6) Legal action

The Code of Conduct is approved by the Board of Directors Meeting No.5/2020 on August 14, 2020 and is effective from August 14, 2020.