



HARN ENGINEERING SOLUTIONS PUBLIC COMPANY LIMITED

# CODE OF CONDUCT

Approved by the resolution of the Board of Directors at Meeting No. 2/2025 held on 24 March 2025.

Effective from 1 April 2025 onwards.



**Supporting Document**

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**Revision History**

Revision No.	Date	Description of Revision	Reason
Rev.0	10/5/2018	Prepared new documents and information	For use as guidelines
Rev.1	1/4/2019	Reviewed and updated requirements	To ensure accuracy and completeness
Rev.2	1/4/2020	Reviewed without revision	To ensure annual review
Rev.3	1/3/2021	Revised the Company's address (page 13)	Due to relocation of the Company's address
Rev.4	3/4/2023	Revised the signatory name to Mr. Thammanoon Tripetch	Due to appointment of a new CEO
Rev.5	1/4/2025	Added practices to align with the sustainability assessment of listed companies	To align with the principles of good corporate governance



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### Message from the Board of Directors

The Company has established a written Code of Business Conduct, which was first approved by the Board of Directors on 10 May 2018 and has been regularly reviewed and updated. The Code emphasizes key principles of good corporate governance, anti-corruption, and the importance of equitable, fair, and accountable treatment of stakeholders, including due regard for and respect of the rights of all stakeholder groups, in alignment with evolving laws and regulations and in support of overall social balance. The Company also communicates these principles and practices to both internal and external stakeholders to serve as guidelines for operations in accordance with this Code of Business Conduct.

It is widely recognized that actions stem from conscience and belief. It is therefore a key mission of the Company to instill the Code of Business Conduct deeply in the minds of all employees, so that every action may be carried out with conviction within the framework of the Code. As Professor Sangvien Indaravijaya stated: "What is right remains right even if no one does it; what is wrong remains wrong even if everyone does it."

On behalf of the Board of Directors, it is sincerely hoped that all directors, executives, and employees, as well as subsidiaries, associates, other controlled entities, business partners, and Company representatives, will adhere to this Code of Business Conduct with commitment, to create long-term business value and sustainable growth. The Company regards the practices set out in this Code as part of its rules and regulations with which employees must comply, and failure to do so may constitute a disciplinary offense. Accordingly, this Code should be applied as a fundamental basis for all work activities.

- Sign -

(Mr. PICHET SITHI-AMNUAI)

Chairman of the board of directors.

- Sign -

(Mr. THAMMANOON TRIPETCHR)

Chief executive officer.



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## CODE OF CONDUCT

The Code of Business Conduct refers to the standards of good practices in conducting business established by the Company to serve as guidelines for directors, executives, and employees in performing their duties, in order to preserve and enhance the Company's reputation and integrity throughout its business operations. The Company is committed to management in accordance with moral and ethical principles, fostering credibility in business operations, and maintaining standardized internal and external control systems, based on equitable, fair, and accountable treatment of stakeholders.

To ensure that the Company's operations achieve its business objectives and goals while upholding ethical standards grounded in responsibility, transparency, and integrity for the benefit of stakeholders, the Company has established codes of conduct for work practices and business conduct. These set out the expected standards of behavior for the Company's directors, executives, and employees as follows:

### Chapter 1: Code of Conduct for Directors, Executives, and Employees

#### 1. Compliance with Laws and Relevant Regulations

##### Good Practice Guidelines

- 1.1 Perform duties in compliance with applicable laws, regulations, rules, and respect good customs and traditions relevant to business operations.
- 1.2 Perform duties in strict adherence to the Company's work rules and regulations, principles of good corporate governance, Code of Business Conduct, and corporate values.

#### 2. Personal Conduct

##### Good Practice Guidelines

- 2.1 Uphold moral integrity and fairness, and shall not improperly seek position, recognition, or any other benefits from supervisors or any other persons.
- 2.2 Refrain from vices and all forms of substance abuse, and shall not engage in conduct that may damage personal or the Company's honor and reputation, such as habitual alcohol consumption, involvement with any form of narcotics, incurring excessive debt, or gambling.
- 2.3 Not engage in any occupation, profession, or activity that may affect the performance of duties or the reputation of oneself or the Company.
- 2.4 Not disclose or criticize information or matters concerning other personnel, whether work-related or personal, in a manner that may cause harm to such personnel or to the Company's overall image.



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2.5 Maintain and promote unity and harmony among colleagues.

2.6 Avoid financial obligations with persons conducting business with the Company or among employees, including lending or borrowing money or soliciting funds (e.g., informal lending schemes), except for charitable or public-benefit activities.

2.7 Not engage in any immoral conduct or sexual harassment toward other personnel, whether verbally or physically, that causes distress, annoyance, or an adverse working environment, including unreasonable interference with the work performance of others.

**3. Performance of Duties with Responsibility, Integrity, Diligence, and Discipline**

Good Practice Guidelines

3.1 Perform duties with responsibility, honesty, integrity, diligence, dedication, and full commitment to the Company's work to the best of one's ability, striving for successful outcomes for the benefit of the Company, and strictly adhering to activities that enhance quality, efficiency, and organizational excellence.

3.2 Use working time effectively and efficiently as required, and not engage in or induce others to engage in activities during working hours that are unrelated to the Company's interests.

3.3 Continuously develop oneself in morals and ethics, and pursue ongoing learning and experience to strengthen knowledge and capability, contributing to the advancement of the Company's operations.

3.4 Supervisory employees shall treat colleagues and subordinates with courtesy, kindness, and good human relations; act as good leaders and role models; provide care and support to subordinates in their work; build morale; listen to subordinates' opinions; and manage subordinates with fairness, reasonableness, and propriety.

3.5 Subordinate employees shall accept guidance, refrain from aggressive or insubordinate behavior, and not act in opposition to supervisors; show respect and proper conduct; refrain from disrespect toward supervisors; and maintain courtesy toward colleagues at all levels.

3.6 Work together to promote, protect, and uphold the Company's reputation by maintaining positive attitudes as good employees of the Company, expressing appreciation and pride, and fostering a favorable public image of the Company.

**4. Protection of the Company's Confidential Information**

Good Practice Guidelines

4.1 Not seek any improper benefit, directly or indirectly, for oneself or others through the use of the Company's information, and use such information solely for the Company's benefit.



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4.2 Not disclose the Company's internal confidential information to any person, except where disclosure is authorized by a person with proper authority to those with relevant duties, or where such information has already been publicly disclosed.

4.3 Not disclose business information to competitors, even after cessation of status as a director, executive, or employee of the Company.

### 5. Safeguarding of the Company's Assets

#### Good Practice Guidelines

5.1 Use the Company's resources and assets economically and for maximum benefit.

5.2 Properly care for and maintain the Company's assets in good condition, preventing damage or loss, to ensure efficient and sustainable utilization.

5.3 Not use the Company's assets for personal benefit or for the benefit of others.

### 6. Exercise of Social and Political Rights

#### Good Practice Guidelines

6.1 Uphold the democratic system with the King as Head of State, and encourage the exercise of rights in accordance with the Constitution and other applicable laws.

6.2 Not undertake any actions that may be construed as the Company being involved in or supporting any political party.

6.3 Avoid any conduct that is improper, unlawful, or contrary to morality, or that may disrupt social order, and maintain personal honor and dignity in a manner appropriate to one's status within the society and community in which the Company operates.

## Chapter 2: Code of Conduct of the Company

### 1. Code of Conduct on Fair Treatment of Stakeholders

The Company places importance on equitable treatment of stakeholders. All stakeholder groups shall receive appropriate care from the Company in accordance with their rights under applicable laws or agreements with the Company. The Company and its personnel shall treat stakeholders with honesty, integrity, equality, fairness, and quality, in compliance with contractual terms, agreements, and conditions.

#### 1.1 Treatment of Shareholders and Investors

The Company establishes policies to promote shareholders and investors in exercising their fundamental rights as prescribed by law and the Company's Articles of Association, with due regard to sustainable growth, value creation, appropriate returns, and business operations in accordance with the principles of good corporate governance.



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Good Practice Guidelines

- 1.1.1 Perform duties with honesty and integrity, and make decisions and undertake actions with transparency, prudence, due care, and fairness to all shareholders on an equitable basis, for the overall benefit of shareholders.
- 1.1.2 Report the Company's status, operating results, financial information, and future outlook to shareholders in an equitable, regular, and truthful manner.
- 1.1.3 Not disclose the Company's confidential information or seek personal or third-party benefit from the use of non-public Company information.
- 1.1.4 Not undertake any action that may give rise to a conflict of interest with the Company or constitute corruption.
- 1.1.5 Manage the Company's business to achieve growth, stability, and appropriate returns for shareholders.

**1.2 Treatment of Customers**

The Company establishes a policy to strive to create satisfaction and confidence among customers and external parties by providing high-quality products and services at reasonable and fair prices, and by continuously enhancing product and service standards. The Company has adopted the ISO 9001:2015 quality management system within the organization.

Good Practice Guidelines

- 1.2.1 Comply with laws, contracts, agreements, the Code of Business Conduct, and conditions relating to customers in a transparent and equitable manner. If unable to comply, the Company shall promptly negotiate with customers in advance to jointly seek solutions and prevent damage.
- 1.2.2 Strive to create customer satisfaction and confidence by delivering excellent service quality under appropriate safety and technology standards, and continuously enhance such standards.
- 1.2.3 Conduct marketing communications in compliance with applicable laws and regulations, with due regard to consumer rights, and not support advertising or promotional activities that encourage unlawful or unethical conduct.
- 1.2.4 Communicate marketing information on products and services through offline and digital channels in an appropriate, complete, accurate, and timely manner, without exaggeration or misrepresentation.
- 1.2.5 Ensure that product labeling contains necessary information as required by law.



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- 1.2.6 Conduct marketing communications appropriately for vulnerable groups, including children or youth under 12 years of age, and ensure appropriate digital marketing practices.
- 1.2.7 Maintain good and sustainable relationships with customers, establish customer service systems, and provide communication channels for customers to submit complaints regarding products and services, and act to respond to customer needs as promptly as possible.
- 1.2.8 Strictly maintain the confidentiality of customer information, taking due care to prevent leakage or disclosure to unauthorized persons that may cause damage to the Company.

**1.3 Treatment of Business Partners and/or Creditors**

The Company establishes a policy that emphasizes equality and integrity in conducting business, and safeguarding mutual interests with business partners and/or creditors by strictly complying with applicable laws, rules, commitments, and mutually agreed conditions, and by adhering to ethical business conduct.

Good Practice Guidelines

- 1.3.1 Not engage in any fraudulent conduct in dealings with business partners and/or creditors. If there is information indicating dishonest conduct, the Company shall disclose details to the relevant partners and/or creditors in order to jointly resolve the issue promptly and fairly.
- 1.3.2 Strictly, transparently, and equitably comply with contracts, agreements, and conditions with business partners and/or creditors. If unable to comply, the Company shall promptly notify and negotiate with the relevant partners and/or creditors in advance to seek reasonable solutions.
- 1.3.3 Strictly maintain the confidentiality of business partners' information and not use such information for personal or related-party benefit unless consent has been obtained from the partners.
- 1.3.4 Regularly report the Company's financial position to creditors with honesty, accuracy, and timeliness.

**1.4 Treatment of Trade Competitors**

The Company establishes a policy that emphasizes ethics in trade and fair competition, treating competitors within the framework of the law and adhering to principles of honest and fair competition, without undertaking any actions that may result in unfair trade practices or restrict free competition.

Good Practice Guidelines

- 1.4.1 Treat trade competitors equitably and fairly, and promote free competition, without engaging in any actions that distort market prices or adversely affect consumers.
- 1.4.2 Not seek competitors' confidential information through dishonest or inappropriate means.



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1.4.3 Not damage competitors' reputation through false allegations, defamation, or attacks without factual basis.

1.4.4 Not infringe or unlawfully obtain competitors' trade secrets through fraudulent means.

1.4.5 Not enter into any agreement with competitors or any person that has the effect of reducing or restricting trade competition or creating a monopoly.

**1.5 Treatment of Employees**

The Company establishes policies and practices in accordance with the fundamental rights to which employees are entitled, as well as other support the Company should provide, including remuneration aligned with the Company's performance in both the short and long term, as appropriate and fair, and ensuring safe and hygienic working conditions.

Good Practice Guidelines

1.5.1 Comply with applicable laws and regulations relating to employees, including internationally recognized principles on fundamental human rights.

1.5.2 Provide a working environment that is safe for employees' life, health, physical well-being, and property.

1.5.3 Treat employees with courtesy and respect for individuality and human dignity.

1.5.4 Provide fair and appropriate remuneration based on employees' competence, responsibilities, and performance.

1.5.5 Recruitment, selection, and employment shall be conducted on an equal and equitable basis, considering individuals with knowledge, competence, and experience appropriate to the position and attitudes aligned with the Company's values.

1.5.6 Appointment, transfer, reward, and disciplinary actions shall be conducted equitably, in good faith, and based on employees' competence and suitability.

1.5.7 Promote employee training and capability development by providing opportunities thoroughly and regularly.

1.5.8 Avoid any unfair actions that may affect employees' job security or that may harass or create psychological pressure.

1.5.9 Provide channels for employees to submit complaints in cases of unfair treatment under established policies and regulations, and ensure protection of whistleblowers from adverse consequences.

1.5.10 Listen to opinions and suggestions from employees at all levels on an equal and equitable basis.



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**1.6 Treatment of the Public Sector**

The Company establishes a policy to conduct its business in a manner that contributes to and supports the nation’s development and progress, by complying with applicable laws, rules, regulations, and requirements, and adhering to generally accepted business practices.

Good Practice Guidelines

- 1.6.1 Conduct dealings with government agencies or public officials in a lawful, transparent, and straightforward manner.
- 1.6.2 Not offer bribes, gifts, or benefits to government agencies or public officials for improper business advantage.
- 1.6.3 Not permit public officials to engage in misconduct in relation to the Company’s business and not support corruption.
- 1.6.4 Comply with applicable laws, rules, regulations, and requirements, and adhere to generally accepted business practices.
- 1.6.5 Foster appropriate relationships with government agencies, acting with prudence and due care for the benefit of the Company, the nation, and the public interest.

**1.7 Treatment of Communities, Society, and the Environment**

The Company establishes a policy to conduct its business with due regard to participation in and responsibility toward communities and society, emphasizing compliance with applicable standards, rules, and laws to ensure safety and environmental and public health protection in an appropriate manner, and taking into account impacts on natural resources and the environment.

Good Practice Guidelines

- 1.7.1 Conduct business in compliance with laws and standards on quality, security, safety, occupational health, environment, and energy management, and promote efficient energy conservation for the benefit of society and future generations.
- 1.7.2 Not undertake any actions that adversely affect natural resources and the environment beyond legal limits.
- 1.7.3 Use natural resources as efficiently as possible and seek alternatives to the natural resources utilized, with consideration for both present and future environmental conditions.
- 1.7.4 Not support any activities that are harmful to society or public morality and/or promote vices.
- 1.7.5 Continuously instill awareness of social and environmental responsibility among the Company’s personnel.



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- 1.7.6 Emphasize social, community, and environmental development, and promote the creation and conservation of natural resources, particularly in communities surrounding the Company's operating locations.
- 1.7.7 Support activities that generate public benefit, taking into account appropriateness and sustainable benefits to society and communities.
- 1.7.8 Listen to opinions and suggestions and provide grievance mechanisms on matters that may affect communities, and inform complainants of outcomes within an appropriate timeframe, promoting mutual benefit and sustainable coexistence between the Company and communities.
- 1.7.9 Respond promptly and effectively to incidents affecting communities and the environment arising from the Company's operations, with full cooperation with government authorities and relevant agencies.
- 1.7.10 Regularly allocate a portion of profits to activities that contribute to social and environmental development.

**2. Code of Conduct on Safety, Occupational Health, and Working Environment**

The Company establishes a policy on safety, occupational health, and working environment to foster a sustainable safety culture in operations with stakeholders. The Company sets key performance indicators and transparently reports safety and environmental performance, with stakeholder participation and consultation. It emphasizes the hierarchy of controls for the prevention of workplace accidents and occupational illnesses, promotes hazard awareness, conducts risk assessments, and mitigates environmental impacts arising from business operations. The Company is committed to operating in compliance with applicable environmental, occupational health, and safety laws and requirements.

Good Practice Guidelines

- 2.1 Executives, employees, contractors' personnel, and external visitors shall strictly comply with applicable laws, policies, rules, requirements, and standards on safety, occupational health, and environment, including all relevant standards.
- 2.2 The Company provides communication and awareness programs for employees and relevant stakeholders to ensure understanding of safety, occupational health, and environmental rules, work procedures, and precautions, enabling proper compliance without causing harm to health, property, or the environment.
- 2.3 The Company establishes controls, supervision, and preventive measures against various forms of loss arising from accidents, fire, injuries, occupational illnesses, loss or damage of property,



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security breaches, improper work practices, and other incidents, and maintains a safe working environment for employees, supporting personnel, contractors' employees, and external visitors. Executives and employees are responsible for reporting workplace or near-miss incidents in accordance with prescribed procedures.

- 2.4 The Company establishes emergency control and prevention plans for operational areas to ensure preparedness for potential emergencies, such as fire or workplace accidents.
- 2.5 The Company appoints safety officers at all levels under the supervision of a senior safety officer at the management level.
- 2.6 The Company promotes, supports, and monitors occupational safety performance in accordance with established plans to ensure appropriate safety management for its operations.
- 2.7 The Company promotes, supports, and monitors occupational safety performance in accordance with established plans to ensure appropriate safety management for its operations.
- 2.8 The Company supervises, monitors, and ensures the correction of safety deficiencies affecting employees as reported or recommended by safety officers.
- 2.9 The Company develops its safety management system in compliance with applicable laws and requirements, with regular audits and reviews.
- 2.10 The Company regularly conducts fire evacuation drills and continuously improves such procedures.

**3. Code of Conduct on Respect for International Human Rights Principles**

The Company adheres to internationally recognized human rights principles as a common standard of practice, with due regard to human dignity, rights, freedoms, and equality. The Company shall strictly refrain from any actions that violate or support violations of international human rights, and shall exercise due diligence to ensure that its business operations are not involved in any human rights abuses.

Good Practice Guidelines

- 3.1 The Company shall strictly comply with international human rights principles at both national and international levels, including labor law requirements in each country in which it operates, as well as the Company's human rights-related policies and practices. The Company shall provide a safe and hygienic working environment in accordance with international standards, free from narcotics, and treat all personnel equally without discrimination on the basis of origin, gender, age, color, race, nationality, religion, belief, political opinion, disability, social status, or any other status unrelated to job performance, including respect for personal freedoms and protection of personal data.



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3.2 The Company shall exercise due diligence to ensure that its business operations are not involved in human rights violations, including participation in and adherence to internationally recognized frameworks beneficial to global society, such as the United Nations human rights principles.

3.3 The Company shall provide knowledge and understanding of international human rights principles to its personnel for integration into operations, and shall not support any business or activities that violate international human rights principles.

**4. Code of Conduct on Compliance with Applicable Laws, Regulations, Rules, and Requirements, and Respect for Culture and Traditions**

The Company places importance on compliance with applicable laws, regulations, rules, procedures, and requirements in all jurisdictions where it operates, as well as respect for cultural diversity and local customs and traditions. Accordingly, the Company’s personnel shall study, understand, and respect such laws and cultural norms, refrain from violations, uphold what is right, and act fairly toward all parties. Personnel shall not undertake any actions that conflict with local culture or traditions and shall report any violations or non-compliance with laws when observed.

Good Practice Guidelines

4.1 The Company’s personnel shall study and understand the laws, customs, traditions, and culture of each locality or destination country prior to travel, as well as the regulations, rules, procedures, and requirements directly related to their duties and responsibilities, and strictly comply therewith. This is to ensure that products, samples, equipment, travel documents, travel purposes, and work activities in the destination country are lawful and not contrary to local customs or culture. In case of uncertainty, personnel shall seek guidance from their supervisors and shall not act based solely on personal judgment without advice.

4.2 The Company respects the customs, traditions, and culture of each locality in every country where it operates, and conducts business in compliance with applicable local laws, recognizing that laws, regulations, and customs may vary in conditions, procedures, and practices across jurisdictions.

4.3 The Company’s personnel shall not assist or support any actions that evade or violate applicable laws, regulations, rules, procedures, or requirements relating to the Company’s business. Where Company regulations, procedures, or instructions differ from those applicable in a particular locality or country, personnel shall consult the relevant functions before taking any action.

4.4 Any observed violation or non-compliance with laws, regulations, rules, or requirements shall be reported to supervisors, relevant functions, or through the complaint and whistleblowing channels under the “Complaint and Whistleblowing Measures.” If the matter is considered to have a material impact on the Company, it shall be reported to supervisors immediately.



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### 5. Code of Conduct on Confidentiality and Use of Inside Information

The protection of inside information is of utmost importance to the Company's success and to the professional security of all personnel. To ensure that the disclosure of information to external parties does not adversely affect the Company's business or reputation, the Company has established measures and control systems for safeguarding inside information. Accordingly, the Company's personnel must maintain the confidentiality of inside information and shall not use such information for personal benefit, even after cessation of employment or termination of duties.

#### Good Practice Guidelines

- 5.1 The Company's personnel shall safeguard inside information and documents not permitted for external disclosure that could be used for improper personal, familial, or associated benefit, such as price-sensitive information, trade secrets, and proprietary inventions, which are the Company's rights.
- 5.2 The Company's personnel shall not use confidential information for personal or third-party benefit.
- 5.3 Personnel who receive or handle personal data shall store and use such data in good faith in accordance with the data subject's acknowledgment and consent, with due care and in compliance with applicable laws and the Company's personal data policies.
- 5.4 Information relating to contractual counterparties and agreements with such counterparties shall be treated as confidential and shall not be disclosed to any other person without authorization from both the Company and the counterparty.
- 5.5 The Company shall establish stringent measures and internal controls within each function or department to prevent the premature disclosure of material inside information prior to official release, and such measures shall form part of the Company's key risk control framework.
- 5.6 Supervisors at all levels are responsible for ensuring that no leakage of the Company's material information occurs from personnel under their supervision prior to official disclosure.
- 5.7 Internal sharing of information among personnel shall be limited strictly to the scope of assigned duties and responsibilities, and confidential Company information shall not be disclosed even after cessation of employment or termination of duties.
- 5.8 If requested to disclose information beyond one's responsibility, personnel shall politely decline to comment and refer the inquirer to the designated function responsible for such disclosure, to ensure accuracy and consistency of information.



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### 6. Code of Conduct on Marketing Communications

Marketing communications play an important role in fostering the Company's positive values in society by introducing the Company's innovations to the public. Such communications must be truthful, not misleading or incomplete, and must take into account fairness to all related parties and stakeholder groups.

#### Good Practice Guidelines

- 6.1 Marketing communications shall be truthful and conducted with due regard to fairness toward all related parties and stakeholders.
- 6.2 The Company shall not provide misleading or incomplete marketing information that may cause misunderstanding.
- 6.3 The Company shall not conduct marketing communications or provide information to the media that is false, misleading, contrary to cultural norms or public morality, or defamatory toward competitors, whether directly or indirectly.

### 7. Code of Conduct on Intellectual Property

Intellectual property is one of the Company's most valuable assets and is critical to maintaining its competitive advantage. This includes brand identity elements such as the Company name, logo, copyrights, patents, trademarks, service marks, trade secrets, work processes, innovations, content, and other proprietary rights. It is therefore essential that the Company protects these assets and respects the intellectual property rights of others by not infringing or misusing such rights and by conducting business in compliance with applicable laws and regulations in all countries where it operates.

#### Good Practice Guidelines

- 7.1 The Company shall conduct business in compliance with applicable laws and regulations in all countries where it operates, including contractual obligations relating to intellectual property rights such as patents, copyrights, trade secrets, and other proprietary information.
- 7.2 The Company shall not infringe or misuse legitimate intellectual property rights.
- 7.3 Company personnel responsible for safeguarding trade secrets, proprietary formulas, production processes, or confidential business methods shall maintain strict confidentiality and prevent any leakage of such information.
- 7.4 Company personnel shall respect the intellectual property rights of others and shall not use others' works, even in part, for personal benefit without prior authorization or appropriate compensation to the rightful owner.



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**8. Code of Conduct on the Use of Information Technology and Communications**

The Company provides information technology and communication systems for business operations. The Company’s personnel shall use such systems properly and efficiently in compliance with applicable laws, directives, policies, and procedures governing the use of information technology and communications systems as prescribed by the Company, for the Company’s maximum benefit, and shall exercise due care to prevent any adverse impact on the Company or its stakeholders.

Good Practice Guidelines

- 8.1 Company personnel shall perform work using properly licensed computer software. When performing duties on computers outside the office, software licensing shall be verified each time. The installation or use of unlicensed software within the office is strictly prohibited.
- 8.2 Company personnel shall keep their passwords confidential and not disclose them to others to prevent unauthorized access, and shall refrain from using the internet or accessing unfamiliar websites that may pose risks to the Company’s computer systems.
- 8.3 Company personnel shall not use computers to harm, violate, or disrupt the work of others. The Company maintains information technology security in accordance with international standards, and personnel are responsible for safeguarding such systems.
- 8.4 Company personnel shall not use computers to spy on, alter, or access others’ files without authorization, or create false data that may lead to information theft.
- 8.5 Company personnel may use information technology and communication equipment for reasonable personal purposes, provided that such use is not for personal business, does not affect the Company’s operations, impair work efficiency, or cause disturbance to others.
- 8.6 Company personnel shall use Company-provided email and internet for business purposes with due care, shall not cause damage to the Company’s reputation, and shall not use the Company’s name or trademarks in public electronic media.
- 8.7 Company personnel shall not copy copyrighted software belonging to others.
- 8.8 Company personnel shall supervise external parties’ access to data files and programs strictly on a need-to-know basis and comply with applicable information technology and communications laws.
- 8.9 Company personnel shall strictly comply with applicable information technology and communications laws and related Company policies, such as the Company’s information technology development policy and plans.
- 8.10 If the Company determines that personnel have violated these requirements and the investigation confirms such violation, disciplinary and/or legal action shall be taken as appropriate.



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**9. Code of Conduct on Anti-Corruption**

The Company has established guidelines, measures, and responsible roles, and conducts regular reviews and assessments of compliance with the “Anti-Corruption Measures Manual” to ensure alignment with changes in business operations, regulations, and applicable laws.

All directors, executives, and employees are strictly prohibited from engaging in or accepting any form of corruption, whether directly or indirectly, for personal or related-party benefit, regardless of whether acting as the recipient, giver, or offeror of bribes, in monetary or non-monetary form, to or from government agencies, private entities, or business partners with whom the Company conducts or has contact in business.

Good Practice Guidelines

- 9.1 Company personnel shall comply with the Anti-Corruption Measures Manual, corporate governance principles, and the Code of Business Conduct, and shall not be involved in any form of corruption, directly or indirectly.
- 9.2 Company personnel shall not ignore or overlook any acts indicative of corruption related to the Company, and shall report such matters to their supervisors, responsible persons, or the Audit Committee, and cooperate in fact-finding investigations.
- 9.3 The Company integrates good corporate governance, risk management, internal control, and regulatory compliance to support anti-corruption governance, including regular corruption risk assessments in operational processes.
- 9.4 The Company shall ensure fairness and protection for personnel who refuse to engage in corruption related to the Company’s activities, without demotion, punishment, or adverse consequences, even if such refusal results in loss of business opportunities, and shall recognize such conduct as exemplary behavior.
- 9.5 Company personnel engaging in corruption shall be deemed to have violated the Company’s Code of Business Conduct and shall be subject to disciplinary action in accordance with Company regulations and may be subject to legal penalties if unlawful.
- 9.6 When engaging any person to act on behalf of or in the name of the Company, responsible personnel shall inform such person of and ensure compliance with the Anti-Corruption Measures Manual, and shall ensure that engagement terms are transparent, appropriate, lawful, and free from corruption.
- 9.7 The Company shall implement measures to review and monitor business partners and customers to ensure appropriate compliance with the Anti-Corruption Measures Manual.
- 9.8 The Company shall establish clear, robust, efficient, transparent, and auditable authorization levels for management decisions.



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9.9 The Company shall maintain an internal control system covering finance, accounting, recordkeeping, and other processes related to the Anti-Corruption Measures Manual.

9.10 The Company shall continuously communicate anti-corruption policies and measures, including whistleblowing channels, to personnel to ensure proper understanding and implementation of the Anti-Corruption Measures Manual, and shall also communicate such policies to business partners, stakeholders, and the public through various channels.

9.11 The Company shall conduct internal audits covering key activities such as procurement, giving or receiving gifts, assets or other benefits, and hospitality exceeding normal business practice, to ensure internal controls achieve intended objectives, verify compliance with procedures and regulations, and provide recommendations for improving operational effectiveness.

**10. Code of Conduct on Conflict of Interest**

All actions of the Company shall prioritize the Company's best interests and avoid involvement in activities that may give rise to conflicts of interest, including participation as a partner, holding positions, financial involvement, or relationships with external parties.

Good Practice Guidelines

10.1 Company personnel shall make business decisions for the Company's maximum benefit.

10.2 Any actions or decisions of Company personnel shall be free from the influence of personal interests or those of related persons, whether by blood relation or close personal association, and transactions shall be conducted at fair and appropriate market terms as if dealing with external parties. When making or approving decisions involving potential conflicts of interest, personnel shall report to their supervisors or relevant approvers and withdraw from participation in such matters.

10.3 Company personnel shall comply with Company regulations under the same standards and devote full working time and best efforts to their duties, without diverting working time to unrelated external business activities.

10.4 Company personnel shall not become partners, decision-making shareholders, or executives in businesses that compete with or are of the same nature as the Company's business.

10.5 Company personnel shall avoid financial involvement and/or relationships with external parties that may cause loss of benefit to the Company, create conflicts of interest, or impede effective performance of duties.

10.6 The duties and positions held by all directors, executives, and employees shall not conflict with the Company's interests.



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10.7 Directors and the top four executives shall prepare conflict-of-interest reports annually and/or whenever such situations arise during the year.

**Implementation and Compliance Monitoring**

The Company stipulates that it is the duty and responsibility of all directors, executives, and employees to acknowledge, adhere to, and comply with the Company’s Code of Business Conduct.

The Company shall promote and provide knowledge and understanding of this Code to directors, executives, and employees. In addition, executives at all levels are responsible for supervising and placing importance on ensuring that employees under their supervision understand and strictly comply with the Company’s Code of Business Conduct.

The Company shall not undertake any actions that are unlawful or contrary to the Code of Business Conduct, as follows:

- (1) Any director, executive, or employee who violates the prescribed principles or practices shall be subject to disciplinary action.
- (2) Where there is reasonable belief that any act violates laws, regulations, or governmental rules and requirements, the Company shall consider referring the matter to the relevant authorities for further legal action.
- (3) If any employee encounters uncertainty in decision-making or performance of duties regarding matters not specified in this Code of Business Conduct, the employee shall consider the following questions before taking action:
  - Is the action in violation of any law? If yes, it must be discontinued.
  - Does the action cause serious adverse impact on the Company’s stakeholders? If yes, it must be discontinued.
  - Does the action harm the Company’s reputation or image? If yes, it must be discontinued.
  - Is the action acceptable and able to be publicly disclosed? If it is not acceptable or cannot be publicly disclosed, it must be discontinued.
- (4) Report to supervisors or responsible persons upon becoming aware of any violation of, or non-compliance with, the Company’s Code of Business Conduct.
- (5) Cooperate in fact-finding investigations with the designated functions or persons.
- (6) Supervisors at all levels shall lead by example in complying with the Company’s Code of Business Conduct and shall foster a work environment in which employees and related parties understand that compliance with the Code is proper and mandatory.



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In this regard, if any employee or external party becomes aware of, or has reasonable grounds to suspect, any misconduct, including any person adversely affected by the Company's business operations or by the actions of the Company's directors, executives, or employees that violate or fail to comply with applicable laws and/or the Company's Code of Business Conduct, policies, or regulations, including any acts that may indicate corruption, such matters may be reported or disclosed through the whistleblowing channels specified in the Company's Anti-Corruption Measures Manual, Clause 19: Whistleblowing and Complaint Mechanisms, as follows: (1) By post addressed to the Chairman of the Audit Committee, Harn Engineering Solutions Public Company Limited, 559 Soi Soonvijai 4, Rama 9 Road, Bangkok, Huai Khwang, Bangkok 10310, Thailand (2) Email: [chairac@harn.co.th](mailto:chairac@harn.co.th) (3) Website: [www.harn.co.th](http://www.harn.co.th)

The Company shall conduct investigations on a confidential and anonymous basis to protect whistleblowers from any potential adverse impact arising from such complaints or allegations (details as set out in the Anti-Corruption Measures Manual, Clause 20: Whistleblower Protection Mechanism).