

(Translation)



Bangkok Land Public Company Limited

Code of Conduct

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Code of Conduct

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Code of Conduct

This Code of Conduct serves as good business practices for the Board of Directors, executives and employees of the Company, to which they adhere with integrity, fairness, social responsibility and perseverance with the aim of achieving professionalism. The Company sets up this Code of Conduct to cover the operating and ethical aspects of its business and as action guidelines for the Board of Directors, executives and employees. This Code of Conduct emphasizes the importance of good governance, equal and fair treatment of stakeholders, and auditability, including regard and respect of the rights of all stakeholders in order to create social equilibrium. The Company attaches great importance to personnel development in terms of their expertise, skills and ethics by encouraging them to commit to learning, developing businesses, transferring knowledge and know-how among themselves, and being ever conscious of honesty, perseverance and accountability in order to achieve professionalism.

Chapter 1: Ethics of the Board of Directors, Executives and Employees

1. Code of behaviour

- 1.1 Perform duties in compliance with the applicable laws, the Company's objectives and articles of association, the principles of good governance, the ethical code, and the resolutions of the shareholders' meetings;
- 1.2 Always learn new things and experiences in order to enhance skills and expertise for more efficient performance of duties;
- 1.3 Adhere to the moral rules and principles and refrain from seeking, requesting or accepting undue or unlawful gain for oneself or one's family, friends or acquaintances;
- 1.4 Shun all vice and drugs and refrain from behaving in such a way as to disgrace oneself or the Company;
- 1.5 Refrain from engaging in any occupation, profession or action that could affect the performance of duties or one's or the Company's reputation;
- 1.6 Avoid having financial obligations with any person doing business with the Company or among the staff themselves, including borrowing/lending

- money and raising funds, except for activities for charity and public interest;
- 1.7 Refrain from seeking undue gain of any benefit, directly or indirectly;
 - 1.8 Refrain from doing anything that has an appearance of managing any other company, which results in affecting the Company's interests, or in favour of any natural or legal person for one's own or someone else's benefit; and
 - 1.9 Create and maintain harmony within the Company.

2. Treatment of colleagues

- 2.1 Encourage teamwork by helping one another in the interests of the Company as a whole;
- 2.2 Treat colleagues with politeness, generosity and good interpersonal skills, be able to adjust oneself to others, and refrain from concealing information necessary for the performance of duties by the colleagues;
- 2.3 Respect others by not claiming someone else's work as one's own;
- 2.4 Superiors to behave in a respectable and exemplary way towards subordinates as well as treat subordinates and colleagues of all levels with politeness;
- 2.5 Subordinates to treat superiors with respect;
- 2.6 Subordinates to obey superiors' advice and, in performing their work, refrain from going over their immediate superior's head, except on orders of the superiors of higher level, as well as treat personnel and colleagues of all levels with politeness;
- 2.7 Avoid disclosing or criticizing information or affairs, whether work-related or private, of others in such a way as to cause damage to them or to the reputation of the Company as a whole; and
- 2.8 Refrain from doing anything that is immoral, constitutes sexual harassment of others, causes a nuisance, or creates a discouraging, unfriendly or aggressive workplace environment, including unreasonably disturbing the performance of duties by others, and verbal or physical molestation, indecency and sexual harassment.

3. Treatment of the Company

- 3.1 Perform duties with accountability, honesty, commitment and dedication as well as comply with the applicable rules and regulations, the principles of good governance, the ethical code, the Company's policies, corporate values and customary practices, all in the best interests of the Company;
- 3.2 Perform duties in compliance with the policy on occupational health, safety and work environment;
- 3.3 Treat secrets of customers, business partners, and the Company in strict confidence by ensuring that their confidential documents or confidential information are not disclosed or leaked to unauthorized persons, which could otherwise cause damage to the Company;
- 3.4 Refrain from speaking ill of others or doing anything that could lead to disharmony or division within the Company or damage to any person related to the Company;
- 3.5 Carry oneself with dignity and honour in the community, including among public authorities and other agencies, and refrain from doing anything that could harm the Company's image and reputation;
- 3.6 Build up good relationship and cooperation with the community, public authorities, and relevant agencies in the interests of the Company and the country as a whole;
- 3.7 Care for and make every effort to maintain a good workplace environment in the Company, including performance excellence;
- 3.8 Avoid offering and/or accepting gifts and/or entertainment and/or any benefits to and/or from business partners or those related to the Company's business operation, except in the fair course of business or on festive occasions or as customary practices where such gift and/or entertainment is of appropriate value;
- 3.9 Refrain from engaging in, or concealing, any activity that might create a conflict of interest with the Company, or corruption or any illicit activity; and
- 3.10 When corruption or appearance of corrupt practices is found or suspected, address it with superiors or responsible persons or through the designated

reporting channels, as well as assist in any inquiry or investigation as set out in the Company's regulations.

Chapter 2: Code of Conduct

1. Treatment of stakeholders

The Company attaches importance to equal treatment of stakeholders. Every group of stakeholders should be taken care of by the Company in accordance with their legal or contractual rights, and the Company and its personnel shall treat the stakeholders with honesty, equality and fairness subject to any relevant contracts, agreements, or conditions.

Practice

1.1 Customers

- 1.1.1 Implement any contracts, agreements or conditions made with the customers transparently and equally, and where impracticable, inform the customers beforehand in order to find the way to solve the problem and prevent any damage;
- 1.1.2 Commit to giving the customers satisfaction and confidence in high quality service under appropriate security and technology, as well as ongoing standard enhancements;
- 1.1.3 Disclose information regarding the services in a complete, accurate and timely fashion, and maintain good and sustainable relationships with the customers;
- 1.1.4 Set up customer services and communication channels to allow the customers to make complaints about the Company's goods and services, and make every effort to respond to the customer's demands as soon as practicable; and
- 1.1.5 Always value the confidentiality of the customers' confidential information and refrain from using such confidential information for one's own benefits and/or for the benefits of others concerned.

1.2 Business partners

- 1.2.1 Implement any contracts, agreements or conditions made with the business partners in a strict, transparent and equal manner;
- 1.2.2 Refrain from dishonestly requesting, accepting or offering any benefits to or from the business partners;
- 1.2.3 Where fulfillment of conditions is impracticable, notify the business partners beforehand in order to find the way to solve the problem on reasonable grounds; and
- 1.2.4 Always value the confidentiality of the business partners' confidential information and refrain from using such confidential information for

one's own benefits and/or for the benefits of others concerned, except with consent of the business partners.

1.3 Competitors

- 1.3.1 Treat the competitors equally and fairly and on the basis of fair returns for both sides;
- 1.3.2 Conduct business activities within the framework of the fair competition;
- 1.3.3 Refrain from obtaining confidential information of the competitors by dishonest or inappropriate means;
- 1.3.4 Refrain from discrediting the competitors with slander and untruth;
- 1.3.5 Refrain from making any arrangements with the competitors that have the effect of reducing or limiting competition; and
- 1.3.6 As competition laws are complicated and differ from country to country, Legal Department should be consulted to prevent violation of any country's laws.

1.4 Creditors

- 1.4.1 Implement any contracts, agreements or conditions made with the creditors in a strict, transparent and equal manner;
- 1.4.2 Honestly and accurately report the Company's financial status to the creditors on a regular basis; and
- 1.4.3 Where fulfillment of conditions is impracticable, notify the creditors beforehand in order to find the way to solve the problem and prevent any damage.

1.5 Employees

- 1.5.1 Ensure fair competition and a fair selection and recruitment process where all applicants are given equal opportunity, taking into consideration their expertise, skills, experience and moral values suitable for the position and job description as well as their attitude towards corporate values;
- 1.5.2 Ensure fair pay commensurate with expertise, skills, responsibility and performance of each employee;
- 1.5.3 Ensure that the appointment, transfer, reward and punishment of employees are fair and above board, taking into consideration their expertise, skills, suitability and performance or behaviour;
- 1.5.4 Treat all employees equally and fairly and attach importance to the development and transfer of employees' skills and expertise by giving them equal opportunity;
- 1.5.5 Comply with all laws, rules and regulations applicable to employees as well as the basic human rights under the international standards without any kind of discrimination based on race or ethnic origin,

sex, colour, religion, disability, financial status, social class, education or any other status not directly related to their work;

- 1.5.6 Provide the employees with a safe and healthy workplace environment that is safe for their life, health and property;
- 1.5.7 Avoid any unfairness in conducting business activities, which may affect the integrity of the employees' work;
- 1.5.8 Encourage the employees to familiarize themselves with the ethical code and their roles and responsibilities to ensure ethical practices throughout the Company;
- 1.5.9 Encourage the employees to engage in shaping the direction in which their work will take and in solving the problems of their work unit and the Company on the whole;
- 1.5.10 Provide the employees with, or encourage them to undergo, additional training in their field of work;
- 1.5.11 Encourage the employees to be good and moral persons;
- 1.5.12 Listen to opinions and suggestions of the employees of all levels equally; and
- 1.5.13 Provide reporting channels for the employees to report any suspected or observed non-compliance with the laws, the government's regulations, or the Company's Corporate Governance, Code of Conduct, policies and regulations, or suspected corruption; and provide protection for the employees making such reports or the whistleblowers as well as those involved against negative outcome of the reporting or whistleblowing.

1.6 Treatment towards social community and the environment

- 1.6.1 Refrain from doing anything that could harm natural resources and the environment far more than permitted by law;
- 1.6.2 Discourage any activity that is detrimental to the community or the good morals and/or promotes immoral behaviours;
- 1.6.3 Attach importance to community activities by emphasizing the need for the development of the community and the environment and the preservation of natural resources, particularly in regard to the community around the Company;
- 1.6.4 Encourage activities for public interests, e.g., medical and public health activities, education for people in the community, sport activities, support for local cultures and traditions, etc., taking into consideration the suitability of the activities and the sustainability of the benefits to be enjoyed by the community;
- 1.6.5 Continuously cultivate the sense of social responsibility and care for the environment in the Company and its personnel;
- 1.6.6 Provide cooperation and ensure strict compliance with the applicable laws and regulations;

- 1.6.7 Listen to opinions and suggestions and set up a community complaint system where inquiries and investigations are conducted to find the cause of the problem and where once the cause is identified, the situation is rectified and those making the complaints are notified of the results within reasonable time, thus creating a sustainable dependency and co-existence of the Company and the community;
- 1.6.8 Respond in a timely and effective manner to any events that have effect on the community and the environment caused by the Company's business activities by giving the public authorities and relevant agencies full cooperation in the matter; and
- 1.6.9 Conduct business activities in accordance with quality, integrity, safety, occupational health, environment and energy management standards, as well as encourage efficient energy conservation in the interests of the next generation.

2. Procurement

Procurement is a process of crucial importance to the Company's existence. Accordingly, the Company's procurement must be in accordance with the prescribed procedures as well as fair, reasonable, transparent and auditable. There will be no conflict of interest, and the business partners will be treated equally and with fair competition, all in the best interests of the Company.

Practice

- 2.1 Procurement is carried out in strict compliance with the procurement procedures, taking into consideration the needs, price worthiness and the quality of goods and services. It will also be transparent and in line with the procurement authority. Complete and correct information will be given to the business partners openly, and the business partners will be given equal opportunity without discrimination and with fair competition.
- 2.2 Relationship with the business partners should be on equal terms. No benefits or property will be demanded from the business partners. Neutrality should be maintained, and the business partners should be kept at arm's length to avoid their influence over decision-making, in which case the intended transparency and fairness will otherwise be impaired. Opinions and suggestions of the business partners should be listened to in order to solve operational issues.
- 2.3 The Company's personnel will not involve themselves in a selection process for business partners who are related to them, e.g., being their

fathers, mothers, siblings, spouses, children, in-laws, etc. and must comply with the Code on Conflict of Interest.

- 2.4 Confidential information of each bidder or tenderer must be treated in strict confidence and not disclosed to other bidders or tenderers. This includes non-disclosure of any information or documents regarding procurement to any business partner or competitor, except with approval of the authorized person and in compliance with the Code on Confidentiality and Insider Information.
- 2.5 The executives with procurement authority must monitor, supervise and ensure that the procurement is carried out in accordance with the prescribed procedures and the ethical code. They must also exercise their discretion when giving advice to, and hearing the opinions of, the employees.

3. Respect of Human Rights

The Company adheres to the universal principles of human rights where dignity, rights, freedom and equality are recognized. The Company shall definitely not do anything that has the effect of encouraging violations of human rights and shall ensure that its business activities are not involved in such violations.

Practice

- 3.1 The Company shall strictly follow the principles of human rights at local and international levels, including the restrictions of the labour laws of each country where it operates. The Company will provide a safe, healthy and drug-free workplace environment that meets international standards and will treat all personnel equally without discrimination based on race or ethnic origin, sex, age, colour, nationality, religion, political affiliation, disability, social class, or any other status not related to the performance of their duties. In addition, the Company will respect personal rights and protect personal information.
- 3.2 The Company shall ensure that its business activities are not involved in the violations of human rights and shall join and submit to any initiatives or practices beneficial to the global society, e.g., the UN Human Rights.
- 3.3 The Company shall educate its personnel on the principles of human rights to ensure adherence to such principles while performing their duties. Any undertaking and/or activity that violates human rights is discouraged.

4. Compliance with applicable laws, rules and regulations; Respect of cultures and traditions

The Company takes compliance with applicable laws, rules, regulations, and requirements of each country where it operates seriously and also respects cultural differences of each locality. The Company's personnel must understand, respect and insist on doing the right thing and being fair to all. They shall neither violate the law nor do anything that is against local cultures and traditions. When being aware of any violation of or non-compliance with the law, they shall report it to the Company.

Practice

- 4.1 The Company respects local cultures and traditions of each country where it operates. In conducting its business operation in a country or locality, the Company realizes and acknowledges that laws, rules, cultures and traditions differ from country to country and that each country may adopt different conditions or procedures for doing things.
- 4.2 The Company's personnel shall not assist or encourage any avoidance or violation of any laws, rules, working procedures, or regulations regarding the Company's business operation. If it is found that the Company's rules, requirements, working procedures or orders differ from those applicable in a country or locality, the Company's personnel shall consult the relevant department before proceeding any further.
- 4.3 If any violation of or non-compliance with the laws, rules and regulations is found, the Company's personnel shall report it to their immediate superior, the relevant department or through the reporting channels. If the matter is likely to have a significant impact on the Company, the relevant superior shall be reported immediately.

5. Political Neutrality

The Company has a policy on political neutrality, that is, it will not support any political party or do anything that suggests political affiliation, directly or indirectly, including utilizing the Company's resources for any activities that could render the Company political unneutral and/or suffered damage as a result of its involvement in such activities. On the other hand, the Company respects the rights, freedom and political rights of its personnel as a good citizen under the law and democracy.

Practice

- 5.1 The Company realizes the importance of political neutrality and refrains from supporting or affiliating itself with any political party or any person with political power.
- 5.2 The Company has no policy on financing or utilizing its resources in politics or in support of any political party or politician, directly or indirectly, for the benefits of that particular politician or political party.
- 5.3 The Company shall not engage in any political campaign or advertisement for any political party or politician in the Company's area nor shall it use its resources and property for such purposes.
- 5.4 The Company adheres to democratic principles and encourages its personnel to exercise their voting rights under the Constitution.
- 5.5 The Company's personnel can exercise their political rights as individuals and will not abuse their positions in the Company or use the Company's name or logo to solicit contributions or support from other persons for the benefits of any politician or political party. The Company's personnel should take care over any act that might mislead the public into believing or thinking that the Company supports or affiliates itself with any particular political party, and their exercise of political rights must not interfere with their work for the Company or create any conflict of interest.

6. Donation and Financial Aid

The Company has a clear policy on donation and financial aid. Donation and financial aid must be legitimate, transparent, and given in the name of the Company and in accordance with the Company's regulations to ensure that they are used in the public interest or for the true objectives of the donation and not for any dishonest objectives.

Practice

- 6.1 As for donation to any charitable organization with a social purpose, such organization must be reliable and the donation must be given in the name of the Company and in accordance with the Company's prescribed procedures. Transparency, legality and follow-up of such activity are required to ensure that the donation is used in the public interest and/or for the true objectives of the donation.

- 6.2 Grant of financial aid to any organization or activity must be for the purpose of promoting the Company's business operation or good image. The Company's name and/or logo will be clearly displayed, and the grant must be legitimate, transparent, and in accordance with the Company's prescribed procedures.
- 6.3 The Company clearly defines the amount of, and the hierarchy of decision-making authority over, the donation and financial aid, with evidence of approvals and relevant records maintained by the Accounting Department. An audit will also be conducted by the Internal Audit and an independent third-party auditor to ensure integrity and transparency of the donation and financial aid.

7. Offer or receipt of gifts or other property or benefits

Offering or accepting gifts or other property or benefits is reasonably allowed on grounds of appropriate value. Under no circumstances will a request or promise to offer or receive any gifts or other property or benefits, which may have influence over the recipient's decision-making, be allowed. This is in accordance with the guidelines for offer or receipt of gifts or other property or benefits.

Practice

- 7.1 The Company's personnel and/or their family should in no case request gifts or other property or benefits from contractors, vendors, suppliers, joint venture partners, or those associated with the Company's business operation.
- 7.2 If the superior is of the opinion that any gifts or other property or benefits should not be accepted, the same will be returned to the giver immediately. If the return is impracticable, then the same will be handed over to the relevant superior to forward to the Human Resources Department, where those gifts or other property or benefits will be put to good account for the Company.
- 7.3 Gifts offered to the Company in commemoration of special occasions, e.g., the signing ceremony of joint venture agreements, awards ceremony, or as souvenirs of social activities can be accepted by the Company's personnel on the Company's behalf as far as reasonable and appropriate.
- 7.4 The Company's personnel should not offer gifts to their superior, and the superior may not allow, or connive with, his/her relative(s) to accept gifts

from his/her subordinates, unless it is a customary practice and the gifts are of appropriate value.

- 7.5 As for offered property or benefits, from inside or outside the country, whose value exceeds nominal value, whether or not given as personal effects, and which are practically hard to refuse for the sake of personal relationship, the recipient must report to his/her superior in no time.
- 7.6 The Company's personnel should not offer or accept or promise to offer or accept any benefit or anything of value among themselves or to/from any third parties, in particular government officials, in order to persuade them to act or omit to act, and shall refrain from any conduct that might be construed as such, including bribery or similar activities. The Company's personnel should make certain that any offer of gifts or other property or benefits to any third party or government official inside and outside Thailand is not against the laws and the local customary practices.
- 7.7 Any work unit/department that deals with business partners, customers, joint venture partners, or those associated with the Company's business operation must apprise them of this Code of Conduct on a regular basis.
- 7.8 Any staff member or superior negligently or intentionally failing to comply with this practice shall be deemed behaving in violation of the Company's regulations, in which case he/she may be investigated or punished in accordance with the Company's policy on and procedures for personnel management.

8. Conflict of Interest

Any conduct of the Company is intended for the Company's best interests. The Company avoids engaging in any activity that might create a conflict of interest, whether in partnership, positions in finance, or third-party relationship. The Company's personnel should adhere to the Company's regulations in this respect, and a report on conflicts of interest shall be prepared on a yearly basis and/or upon occurrence of each conflicting event during the year.

Practice

- 8.1 The Company's personnel will make decisions on the Company's business activities in the best interests of the Company.
- 8.2 Any conduct or decision of the Company's personnel must not be influenced by their personal needs or the needs of their blood relatives or

personal acquaintances, and any price involved in such conduct or decision must be fair and appropriate, as if it were a transaction carried out with a third party. When a decision or an approval for a transaction that might create a conflict of interest is required of the Company's personnel, they shall report to their superior or any person with the authority to approve and then withdraw from such transaction.

- 8.3 The Company's personnel must follow the Company's regulations and meet the same operating standards by devoting themselves full-time to performing duties to the best of their ability and not spending the Company's time on any outside business activities that are not in the interests of the Company.
- 8.4 The Company's personnel must avoid having financial involvement and/or relationship with any third party, which could cause the Company to lose benefits or create a conflict of interest or hamper work efficiency.
- 8.5 Performance of duties and taking up of positions by directors, executives and employees must not be in conflict with the Company's interests.

9. Confidentiality and Insider Information

Protection of insider information is of crucial importance. Accordingly, the Company sets up control systems and measures to ensure that provision or disclosure of its insider information to a third party does not cause harm to its business and reputation.

The Company's personnel must keep any insider information confidential and must not use it for their own benefit even after the termination of their employment.

Practice

- 9.1 The Company's personnel should keep and maintain insider information and non-public documents, which could lead to undue gain of any benefit for themselves or their family, relatives or friends, e.g., information affecting share prices or trade secrets, all of which are the Company's rights.
- 9.2 The Company's personnel shall not use any confidential information for their own or someone else's benefit.
- 9.3 The Company's personnel who receive or whose work deals with personal data must retain or use such information with special care.

- 9.4 Any information relating to the parties to an agreement and their arrangements is confidential information that cannot be revealed to other persons, except with approvals of the Company and the parties to such agreement.
- 9.5 Control systems and measures should be set up in each division or department to ensure that the Company's insider information is protected from being disclosed to the public before its official disclosure, such control systems and measures being part of the Company's risk control.
- 9.6 Superiors in the chain of command are assigned to supervise and ensure that no material data and information is leaked to outside of the Company before its official disclosure by any person under their command.
- 9.7 Insider information must be used within the scope of duties and responsibilities assigned to each of the Company's personnel.
- 9.8 The Company's personnel shall not disclose the Company's confidential information even after the termination of their employment.
- 9.9 If asked to disclose any information outside the scope of their responsibilities, the Company's personnel should politely decline to do so and suggest that the matter be addressed to the responsible division or department directly to ensure that the disclosed information is accurate and that the disclosure is heading in the same direction.

10. Intellectual Property

Intellectual Property (IP) is one of the Company's most valued property and is of vital importance to the Company's competitiveness. IP includes the Company's name, logo, copyright, patent, trademark, service mark, trade secrets, working procedures, innovations, contents, and legitimate rights. It is imperative for the Company to protect such property and to respect the same of others by not violating or misusing the Intellectual Property Rights (IPR) and doing business in compliance with the laws and rules of each country where the Company operates.

Practice

- 10.1 The Company shall conduct its business activities in compliance with the laws and rules of every country where it operates, including any contractual obligations with respect to the IPR, patent, copyright, trade secret, and other proprietary information.

- 10.2 The Company shall not violate or misuse IPR.
- 10.3 The Company's personnel have a duty to keep trade secrets or secret business practices strictly confidential and to prevent leakages of such information.
- 10.4 The Company's personnel must respect the IPR of others and must not use work products of others, even in part, for their own benefit without approval of or compensation to the owner of such work.

11. Information Technology and Communication

The Company provides information technology and communication for its business operation. The Company's personnel shall, in the best interests of the Company, use the same properly and efficiently in accordance with the applicable laws and the Company's instructions, policies and procedures for use of information technology and communication and shall take care to ensure that the Company or the stakeholders are not affected in any way.

Practice

- 11.1 The Company's personnel shall keep their password confidential and not disclose it to any person to prevent unauthorized access. They must also refrain from using or visiting websites to which they are unfamiliar and which might be detrimental to the Company's computer system.
- 11.2 The Company's personnel shall not, through use of computers, violate or disrupt the work of others.
- 11.3 The Company's personnel shall not, by using computers, snoop around or tamper with other persons' files or fabricate evidence, which might constitute a data breach.
- 11.4 The Company's personnel may, as far as reasonable and appropriate, use IT and communication devices for their personal affairs. However, use of such devices for their own business activities or in such a way as to affect the Company's business operation or work efficiency or annoy other persons is prohibited.
- 11.5 The Company's personnel shall use email transmission and the internet provided by the Company for its business operation with care and not in such a way as to damage the Company's reputation and shall refrain from using the Company's name or logo in public electronic communications.

- 11.6 The Company's personnel must not copy or duplicate other persons' copyrighted programmes.
- 11.7 The Company's personnel have a duty to ensure that any third party has access to the Company's files and programmes only to the extent required for the performance of work, and shall strictly comply with the laws on information technology and communication.
- 11.8 If the Company's personnel are found to violate this Code and the result of the investigation confirms as such, they shall be subject to disciplinary action and/or punishable by law, as applicable.

Disciplinary Action

If the violation is not serious, the relevant executive or employee will be given a written warning, with the nature of such violation and the grounds on which the relevant act is construed as violation stated therein. Such executive or employee will be given the opportunity to argue against such allegation with his/her immediate superior. If no agreement is reached, the matter will be submitted to a disciplinary committee appointed by the Chief Executive Officer, and the disciplinary committee's decision is final. If such violation is repeated or if the executive/employee fails to rectify the first violation despite the written warning, that executive/employee will be subject to disciplinary punishment, which may include the termination of employment.

If the violation is serious, including bribery, fraud, breach of confidentiality regarding confidential information or intellectual property, any act ruining the Company's reputation, or concealment of or failure to report any information, consultation or important documents to superiors, the Company may terminate his/her employment without severance pay and without such prior written notice as required by law.

Whistleblowing

The Company provides for the whistleblowing or reporting by employees and other stakeholders of any violation of the law or the ethical code, any behaviour suggesting corruption or wrongdoing in the Company, incorrect accounting or defective internal control, and also provides mechanisms for protecting the whistleblowers in order to encourage the stakeholders' engagement in effectively monitoring and safeguarding the Company's interests.

Complaints counting as whistleblowing

- Violation of the law or the Company's regulations, corruption, or breach of ethics by any director, executive or employee
- Abnormality in financial reporting or defective internal control
- Matters affecting the Company's interests or reputation

Reporting Channels

1. Electronic mail: utkoffice.th@gmail.com
2. Surface mail: Internal Audit
Bangkok Land Public Co., Ltd.
47/569-576 New Geneva Industry Condominium, 10th Floor
Moo 3, Popular Road 3
Banmai, Pakkred, Nonthaburi 11120
3. Telephone (Internal Audit): 66-2130-0944

In order for this Code of Conduct to be up-to-date and always in line with the ongoing changes and the relevant rules, regulations and practices, the Company shall have this Code of Conduct reviewed on a regular basis or upon occurrence of any change, as deemed appropriate.