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The Code of Conduct of Thai Credit Bank Public Company  
Limited

## Objectives

The Bank operates its business to comply with the Bank of Thailand's corporate governance guidelines and the good corporate governance principles of the Office of Securities and Exchange Commission and the Stock Exchange of Thailand. The Bank has established this Business Code of Conduct as a framework for business operations for directors, executives, employees, and all related parties. The code requires their acknowledgement and fulfilment of their duties with a conscience that upholds honesty, integrity, and the preservation of the The Bank's reputation, while conducting business professionally and responsibly, considering the overall economic, social, and environmental impact. The details of the Business Code of Conduct are discussed below.

### 1. Conduct towards The Bank

The Bank is committed to establishing and preserving the trust and confidence of its customers, shareholders, and the general public in conducting business in accordance with regulations, laws, and responsibilities. This encompasses honesty, integrity, morality, ethics, and adherence to the highest ethical standards, which ultimately lead to successful business operations and maximum benefits for The Bank, while fulfilling social and national responsibilities.

The Bank is dedicated to ensuring that every The Bank employee understands their responsibility in strengthening and upholding The Bank's reputation and prestige by adhering to the highest professional standards and abiding by the ethical framework that The Bank establishes. A The Bank employee is expected to:

- 1.1 protect and maintain the reputation and prestige of The Bank;
- 1.2 maintain a positive attitude towards and take pride in The Bank, while refraining from doing anything that could cause damage to The Bank;
- 1.3 respect and strictly comply with the rules, regulations, orders, and discipline of The Bank;
- 1.4 perform their duties with honesty, morality, ethics, patience, diligence, and a commitment to self-development, striving to be well-rounded individuals and staying abreast of continuously evolving circumstances;
- 1.5 perform their duties with the knowledge, ability and professionalism befitting their roles to the fullest extent; demonstrate competence, efficiency and prudence, while meeting the appropriate standards for their job positions with great care and a strong sense of accountability;
- 1.6 use The Bank's assets for maximum benefit of The Bank, avoiding wastefulness and ensuring that they are not depreciated or lost at an accelerated rate; and refrain from using The Bank's assets for personal gain;
- 1.7 refrain from engaging in detrimental practices that could be harmful to The Bank, such as drug abuse and all forms of gambling;
- 1.8 protect, store, and manage customer information, including The Bank's own data, as required by law to be kept confidential and not disclosed; and collect, handle, as well as use customer's personal data appropriately;

- 1.9 refrain from disclosing confidential information, news, and proprietary technology or specific data of The Bank to external individuals or unrelated parties, which may have an adverse impact and cause damage to The Bank;
- 1.10 maintain strict confidentiality of customers' information and ensure it is not disclosed to external individuals or unrelated parties, or is used for personal benefit;
- 1.11 refrain from seeking personal benefits from their job positions and from using inside or confidential information to seek undue benefits for themselves or others;
- 1.12 refrain from giving promises, commitments, or expectations to customers in any matter in which they do not have the authority to act;
- 1.13 refrain from demanding or receiving assets or any other benefits from customers or individuals engaged in business with The Bank, or individuals who have a vested interest, in exchange for the wrongful performance or omission of their duties, which may result in harm to The Bank;
- 1.14 report any misconduct or illegal practices that may affect The Bank to the relevant departments of The Bank for preventive and corrective measures;
- 1.15 maintain punctuality and allocate their time effectively to carry out tasks for the maximum benefit of The Bank;
- 1.16 refrain from engaging in or participating in any business activities or investments that are competitive or create a conflict of interest with The Bank. This includes being employed as a full-time or temporary staff member in another organisation that operates in a similar manner to The Bank, being a competitor, or having conflicting interests with The Bank;
- 1.17 maintain and foster a sense of harmony and unity among employees, promoting effective teamwork and problem-solving in the The Bank's operations;
- 1.18 refrain from using their positions in The Bank for political purposes or to support any political party; and adhere to The Bank's Good Corporate Governance Policy;
- 1.19 take responsibility and perform work to strictly comply with the law, regulations, and guidelines of government agencies, including Anti-Corruption Policy; and adhere to the Anti-Money Laundering and Counter-Terrorism Financing Policy;
- 1.20 refrain from participating in the decision-making process of transactions in which the employee has interest or involvement to ensure that the decisions are made solely for the full benefit of The Bank.

## 2. Conduct towards customers and society

Transacting with related stakeholders, as counterparties, business partners, business allies, external service providers, service recipients, or customers using The Bank's financial services, as follows:

- 2.1 must have a positive attitude and demonstrate good demeanour in providing service to customers;
- 2.2 must provide services and interact with customers courteously, promptly, and accurately, with a commitment to honesty and integrity, aiming to ensure customers' satisfaction;
- 2.3 must efficiently manage operations to ensure excellent service for customers and stakeholders;
- 2.4 must not verbally harm competitors or do anything that results in monopolistic practices, reduced competition, or market restrictions;
- 2.5 must maintain strict confidentiality of customers' information and ensure it is not disclosed to external individuals or unrelated parties, or is used for personal benefit except with the customer's consent or for compliance with relevant laws;
- 2.6 must provide suitable products and services that meet the needs and capabilities of customers. Additionally, an employee must disclose information regarding products and services, including relevant terms and associated risks. This encompasses providing customers with accurate, clear, and timely service rates and interest rates to ensure that customers understand and have sufficient information for decision-making. Moreover, advertising, and promotional materials must be transparent and clear to avoid any potential misunderstanding;
- 2.7 must conduct oneself in a trustworthy manner, showing care and taking responsibility by presenting beneficial and cost-effective products and services to customers. This allows customers to freely select the services they want, without encountering unnecessary obstacles in their decision to switch to other banks;
- 2.8 must ensure that when The Bank receives/gives gifts, entertainments, and other benefits to strengthen business relationships, The Bank observes caution, discretion, reasonableness, and a value appropriate to the occasion, customs, and traditions;
- 2.9 must ensure that when receiving or giving gifts from or to customers, the value does not exceed THB 3,000.00 each customer and that the transactions are reported quarterly to the The Bank's Board of Directors;
- 2.10 must not bribe, reward, offer, or demand any form of undue influence or inappropriate benefits, whether directly or indirectly, including gifts, property, or any form of entertainment with customers, government agencies, private sectors, or third parties. These actions are prohibited as they aim to influence impartial decision-making, impact the performance of duties, or obtain undue benefits or incorrect advantages for customers;
- 2.11 must comply with the regulations and instructions when spending on hospitality services and other expenses;

2.12 must be responsible for the environment and society, which is one of The Bank's policies to contribute to society. The Bank has assisted in and supported various ongoing social activities, including both government and private sector projects;

2.13 must be open to receiving feedback or suggestions from others; and be patient, tolerant, and prepared to provide accurate information based on one's position or status;

2.14 must ensure that any communications, statements, or information related to The Bank, its business, and its customers are accurate and appropriate. Only individuals specifically authorised to provide information on behalf of The Bank may communicate using public media or any other communication channels.

### 3. Code of conduct towards supervisors, subordinates, and colleagues

3.1 An employee must adhere to virtue, ethics, and morality, while also promoting adherence to moral principles, ethics, and ethics. An employee must also serve as a good role model.

3.2 An employee must convey policies and practices, as well as listen to other employees' opinions and suggestions.

3.3 An employee must train other employees to be responsible and establish a management system that complies with legal and regulatory requirements of The Bank.

3.4 An employee must supervise the operation of the agency to strictly comply with the relevant regulations.

3.5 An employee must maintain a positive attitude towards colleagues and demonstrate respect by listening to and obeying supervisors.

3.6 An employee must carry out the duties assigned by supervisors at The Bank to the fullest extent of their abilities, with prudence, efficiency, and responsibility.

3.7 An employee must conduct themselves towards supervisors and colleagues with a respectful and courteous attitude. They must show compassion and sincerity, fostering unity among the team and assist in ways that are appropriate and beneficial for the common good.

3.8 An employee must collaborate and help each other in their work.

3.9 An employee must show care, concern, and compassion towards their subordinates.

3.10 An employee must educate, advise, and share work experiences with colleagues and subordinates.

3.11 An employee must acknowledge and commend colleagues for their excellent work performance and must not claim credit for the work of others.

3.12 An employee must not criticise their colleagues' personal stories or information. Also, an employee must not make derogatory remarks about supervisors and colleagues.

3.13 An employee must actively participate and cooperate, providing appropriate assistance based on their position and suitable opportunities in activities that The Bank organises.

#### 4. Code of conduct towards themselves

- 4.1 An employee must live a life commensurate with their status. They must not act as an extravagant person and must not spend excessively beyond normal means.
- 4.2 An employee must pursue knowledge and experience to enhance their moral character and improve their effectiveness and efficiency in performing their work.
- 4.3 An employee must uphold the moral system and must not seek positions of merit or any other benefits improperly from the supervisor or any other person.
- 4.4 An employee must refrain from engaging in any form of misconduct that may tarnish their own reputation and the reputation of The Bank. This includes abstaining from all types of gambling activities and not participating in activities such as lending capital without playing, sharing, auctioning, rotating share scheme, or any other similar practices.
- 4.5 An employee must not act as a broker or create questions and answers during the selection process for hiring or promotion.
- 4.6 An employee must not engage in any profession or occupation that adversely affects their performance of duties or the reputation of themselves and The Bank.

#### 5. Code of conduct for Directors

A Director is expected to adhere to guidelines for their conduct based on the The Bank's Business Code of Conduct. They should always bear in mind that fulfilling their duties goes beyond mere obligations and responsibilities towards The Bank and its shareholders. If they also have responsibilities towards customers and other stakeholders, they must consider the collective interests of all these groups as well. Therefore, they must uphold themselves in this manner and must be accountable for their conduct. Details are discussed below.

##### 5.1 Honesty, fairness, morality, prudence, and care

- 5.1.1 A Director must operate The Bank's business with honesty, integrity, morality, prudence, and care, and must prioritise the interests of The Bank as the guiding principle in decision-making.
- 5.1.2 A Director must perform their duties in accordance with the rules, regulations, objectives, and articles of association of The Bank, as well as resolutions of The Bank's Board of Directors and general meeting of shareholders.
- 5.1.3 A Director must carry out their responsibilities in The Bank's business, transparently and independently of management and group of interested persons, and must not have any personal interests involved in business decision-making.
- 5.1.4 A Director must fulfil their duties to the best of their abilities and must not hold positions in other businesses that operate in the same or similar competitive nature as The Bank. If a Director holds a

position as a director or executive in another company, such tenure must be acknowledged by The Bank's Board of Directors' meeting without any objections from The Bank's directors within 6 months from the date of taking positions in other companies. Furthermore, the Director must notify the general meeting of shareholders of the tenure before their appointment as a Director.

5.1.5 A Director must safeguard the interests of shareholders and treat stakeholders with fairness.

## 5.2 Confidentiality

5.2.1 A Director must not disclose The Bank's inside information, including confidential information of customers, employees, and The Bank's operations, whether intentionally or unintentionally, to external parties, without the consent of The Bank and the owner of the information and it is a disclosure in the performance of directors' duties.

5.2.2 A Director must not use information obtained from their directorship for personal or any other benefits, without serving the interests of The Bank.

## 5.3 Disclosure of interests

A Director must disclose benefits derived from their own business or other businesses, including any matters that may present conflicts of interest.

## 5.4 Legal compliance

A Director must comply with the law, rules, and regulations relevant to business operations.

## 5.5 Receiving money, gifts, and other benefits

A Director must not use their position and duties as directors to seek personal benefits from The Bank's business operators, including those who are engaging in business with The Bank.

## 6. **Code of conduct for The Bank's executives**

6.1 An executive must not disclose The Bank's inside information, including confidential information of customers, employees, and The Bank's operations, whether intentionally or unintentionally, to external parties, without the consent of The Bank and the owner of the information. The disclosure must be in the performance of executive's lawful duties.

6.2 An executive must conduct themselves within the framework of good morals and traditions, refraining from any derogatory behaviour, and making decisions with sincerity for the best interests of The Bank, customers, shareholders, and employees.

6.3 An executive must exercise caution in managing their responsibilities. They must demonstrate honesty, integrity, prudence, care, and possess a broad vision. They must serve as role models to enhance efficiency and promote ethical effectiveness in order to achieve The Bank's objectives and goals.

- 6.4 An executive must treat employees with courtesy, govern subordinates with fairness, and refrain from using power unlawfully.
- 6.5 An executive must demonstrate adherence to ethics and moral values by acting as role models for other employees. They should foster a working atmosphere that promotes compliance with ethics and moral values and remain dedicated to preventing and addressing any breaches of ethics and moral principles.
- 6.6 An executive must support the development of employees' potential for progress and enhance their work efficiency. They should provide suitable employee benefits, demonstrate sincerity, respect employee rights, and value their opinions.