

Code of Conduct and Operational Guidelines
for directors, executives and employees

Scope of application

AddTech Hub Public Company Limited (the “Company”) has established this Code of Conduct as a standard applicable to directors, executives and employees at all levels of the Company to be adhered to in the performance of their assigned duties as well as encouraging executives to be good role models in performing their duties under the Code of Conduct. The Company’s executives and employees must acknowledge, understand and strictly adhere to them in order to perform their duties efficiently, openly, transparently and take into account the best interests of the Company and be fair to all related stakeholder groups.

“Executives” refers to the Chief Executive Officer and executives in positions below the Chief Executive Officer until the Chief Department Officer.

“Employees” refers to employees of the Company in positions below the Chief Department Officer, including permanent employees, temporary employees, special contract workers and contract employees.

Business Ethics

1. Business guidelines

The Board of Directors has applied the principles of sustainable business as a guideline for the Company’s business operations with integrity, responsibility and preserving the interests of stakeholders and society and giving opportunities for stakeholders to express their opinions on business operations as a mechanism and process to ensure that actions are taken seriously in leading the organization to a true corporate governance as follows:

1. Strictly comply with all applicable laws, regulations and rules.
2. Comply with the Company's “Corporate Governance Policy” and “Code of Conduct.”
3. Commit to doing business with transparency, honesty and fairness.
4. Take into account the benefits and impacts of the organization’s operations with equality and social fairness to the Company’s stakeholders.
5. Conduct business responsibly and protect the interests of stakeholders and society.
6. Build a strong operating system to prevent corruption through the internal audit system.
7. Require that directors, executives and employees at all levels of the organization participate in anti-corruption, reporting conflicts of interest, effective communication and promoting quality of work life.
8. Provide opportunities for stakeholders to have channels for complaints and listen to opinions and have measures to protect complainants or whistleblowers.

2. Operating Guidelines

2.1 Conflict of Interest Policy

2.1.1 Executives

After the Company has transformed into a public limited company and has been listed as a listed company on the Stock Exchange of Thailand, the Company will comply with the regulations of the Stock Exchange of Thailand where management shall consider conflicts of interest in relation to the connected transactions between the companies carefully, honestly, reasonably and independently, under the framework of good ethics and operate in accordance with the relevant policies, taking into account the interests of the Company to ensure that such transactions are reasonable and for the benefit of the Company as the main priority.

2.1.2 Executives and employees

- Executives or employees must not engage in any actions that conflict with the Company's interests, whether directly or indirectly, and whether by themselves or together with others, whether due to contact with the Company's trade related persons such as business partners, customers, trade competitors, or from using opportunities or information gained from being an employee for personal gain or from engaging in a business that is in competition with the Company.
- Executives or employees must protect the interests of the Company to the best of their ability.
- Executives or employees must not be involved in any other business that may affect the interests of the Company or in competition with the Company.

2.2 Policy on maintaining and using company assets and information/confidentiality

2.2.1 All methods, processes, ideas, as well as technical knowledge or knowledge and/or any other techniques related to the business, work or operation of the Company arising from ideas, studies, research and/or any other actions resulting from the performance of duties and in accordance with employment contracts of executives and employees in all cases shall be regarded as the Company's intellectual property, regardless of whether it is registered or notified by intellectual property laws or not. It is forbidden to redistribute it without the prior written permission of the Chief Executive Officer or a person designated by the Chief Executive Officer.

2.2.2 Executives or employees agree to keep all Company "Trade Secrets" informed or acknowledged as a result of their work for the Company without disclosing it, passing it on to any unrelated and unnecessary person, or making an unauthorized copy, and will not act or refrain from taking actions that will damage the status and reputation of the Company or cause damage to the Company's business, including not undertaking contracted work or becoming an executive or employee, or providing advice, consultation, assistance or any contract with any juristic persons

or business of a person who is a trade competitor to the Company or operating in the same or similar type of business as the Company.

For the purpose of interpreting this provision, “Trade Secrets” refers to trade information that is not publicly known or not yet accessible among individuals who would usually relate to such information. The information is commercially useful due to its confidentiality and is information which the Company has taken reasonable measures to keep it confidential. Trade secrets may be contained in any regulations, contracts or other agreements of the Company that are set forth and will continue or in pursuant to the Trade Secrets Act B.E. 2545 (2002) (and as amended).

- 2.2.3 All executives or employees of the Company shall maintain any “secrets” that they have of the Company of its customers, contract parties, or business partners or any other person that have been informed or acknowledged, as a result of their work for the Company unless such disclosure is permitted by law or required by law, such as disclosure by court order or order of any other government official authorized by law.
- 2.2.4 Executives or employees must be aware of the procedures and methods of information security and follow them to prevent confidential Information from being accidentally disclosed.
- 2.2.5 The Chief Executive Officer will approve the information to be disclosed to the public.
- 2.2.6 Executives or employees must not work for another person or any other organization for which compensation is provided during the Company’s working hours, unless authorized in writing by the Chief Executive Officer or a person designated by the Chief Executive Officer.
- 2.2.7 Executives or employees must not use or bring out the Company’s assets to use for commercial or personal purposes other than for the direct benefit of the Company.
- 2.2.8 Executives or employees must strictly adhere to and comply with the Company’s computer system policies such as:
- Not interfering with the privacy of others through the Company’s computer system (in any case).
 - Not accessing the Company’s confidential information contained in the computer system for the benefit of oneself or that of another person. It can only be used by management or employees who are directly responsible and used for the performance of their positions and responsibilities.
 - Adhere to the rules and regulations governing the use of computer equipment and tools.
 - It is forbidden to access other users’ data and documents on the computer system without permission.
- 2.2.9 Executives or employees must acknowledge and follow the guidelines for using computer systems and information systems correctly and appropriately.
- 2.2.10 It is forbidden to install computer programs or save them in the Company’s computer system without permission.

- 2.2.11 The computer software licensed by the Company shall not be made available to any other person, including suppliers, contractors, customers of the Company, to install the software for personal use. Furthermore, it includes the use of internet by employees or connecting to the internet system to transfer or disseminate obscene or indecent files, sending and receiving information and news electronically (emails) that violates the law or the law on copyright or is contrary to the intention or objectives of the policies or regulations or the information system policy of the Company or violates the Computer Crime Act B.E. 2550 (2007) (and as amended) or other laws.
- 2.2.12 During the performance of the employment contract, executives or employees must not act, refrain or omit from any actions that causes damage to the Company as a result of information, news and/or reports or records or any intentional false or inaccurate communication by any means.
- 2.2.13 Executives or employees must not infringe the intellectual property of the Company and/or any other company that allows the Company to exploit that intellectual property under any contract and/or by any means, whether reproducing or altering for public dissemination or renting out the original or copy, whether or not for profit. If an executive or employee violates this code of conduct, the Company has the right to terminate the employment contract immediately.
- 2.2.14 Executives or employees must use the Company's assets with care, responsibility and maintain any tools or equipment received from the Company in good condition at all time by contacting for reparation if damaged.
- 2.2.15 Executives or employees must not violate the Company's regulations or orders that may cause an accident or damage the Company's assets.
- 2.2.16 Executives or employees must protect the Company's assets from loss or destruction, even if they are not directly responsible for it.
- 2.2.17 Executives or employees must not use Company's equipment or assets for any purpose other than the Company's works.

2.3 Policy for giving or receiving gifts or entertainment

- 2.3.1 Executives or employees shall not demand, accept or agree to accept money or other benefits from business associates.
- 2.3.2 Executives or employees may accept or give gifts in a customary manner and accepting such gifts shall not affect the recipient's business decisions.
- 2.3.3 If an executive or employee has received a gift on customary occasions from the Company's business associates whereby the value of such gift exceeds the common value, it shall be reported to a supervisor according to the hierarchical order.

2.4 Securities Trading and Inside Information Policy

Inside information refers to information on the Company's activities that may affect an investor's trading decisions on certain securities or affect the market price of the Company's securities. Executives and employees must not use inside information that they have acknowledged to benefit themselves or others. Information about the Company's financial conditions and business agreements are trade secrets and shall be treated as inside information that cannot be disclosed without the Company's prior consent in order to protect the interests of shareholders.

2.4.1 Executives are obliged to report their securities holdings in accordance with the regulations of the Stock Exchange of Thailand and the Office of the Securities and Exchange Commission.

2.4.2 The Company must comply with the laws regarding the use of inside information by ensuring that all shareholders receive equality and fairness in this matter and to prevent illegal acts of personnel at all levels of the Company and their families who have been informed or may receive inside information that has not been disclosed to the public. The Company therefore prohibits such persons from trading in shares or soliciting others to buy or sell or offer to buy or offer to sell Company shares either in person or through a broker while still in possession of nonpublic information. The Company and the Stock Exchange of Thailand regard such securities trading as speculative trading or to create an advantage for a particular group of people. (Please consider the Company's policy on inside information supervision in addition.)

2.4.3 The Company has implemented a security system in the workplace to protect confidential files and documents and has taken steps to limit access to nonpublic information to only those concerned and necessary. Therefore, it is the duty of the owner of the information or the holder of the information that has not yet been disclosed to the public to urge those involved to strictly follow the security procedures. Any violation of the use of inside information will be subject to disciplinary action and/or legal penalties, as the case may be.

2.5 Policy on internal control and audit system and accounting and financial reporting

2.5.1 Policy on internal control and audit system

The Company has established an effective internal control and audit system under the audit of the internal auditor and the review of the Audit Committee.

2.5.2 Policy on accounting and financial reporting

The Company's management is responsible for the preparation of accurate, complete and timely financial reports, both annually and quarterly, prepared in accordance with accepted accounting standards.

- The accuracy of transaction recording

- The Company's records of all business transactions must be accurate, complete and verifiable without limitations or exceptions.
 - Accounting transactions and business records must be truthful, without manipulations or false entries created for any purpose.
 - Personnel at all levels must carry out business transactions in accordance and consistent with the regulations and requirements of the Company, including having complete evidence supporting the business transaction and providing sufficient useful information in a timely manner to enable those who are responsible for recording, preparing and evaluating accounting and financial reports, to record and prepare all types of Company accounting and financial reports into the Company's accounting system completely and with accurate details.
- Accounting and financial reports
- All executives or employees must not manipulate, conceal or create false transactions whether they are related to accounting and financial business transactions or operational transactions.
 - All executives or employees should be aware that the accuracy of accounting and financial reports is the shared responsibility of the Board of Directors, executives and responsible employees.
 - All executives or employees are responsible for processing, preparing and/or providing business transaction information.
- Best practices on legal compliance
- Personnel at all levels involved are required to comply with relevant legal regulations and requirements both locally and/or internationally to ensure the correct and complete accounting and financial records of the Company.
 - Personnel at all levels must adhere to the principles of honesty, impartiality and integrity in their recordkeeping.

2.6 Policy on responsibility towards shareholders

- Perform duties with honesty and take any action with fairness to all shareholders.
- Report the status of the organization to shareholders regularly and completely according to the truth.
- Report to shareholders about the future trends of the organization, both positive and negative, with sufficient supporting reasons.

2.7 Policy on treatment of executives or employees

- Provide fair compensation to executives or employees.

- The appointment and transfer of executives or employees, including rewards and punishments, must be done in good faith and based on the knowledge, competence and suitability of the executive or employee.
- Focus on developing employees' knowledge, abilities and skills by providing thorough and consistent opportunities.
- Strictly comply with the laws and regulations related to executives or employees.

2.8 Policy on executive or employees conduct

- Perform duties with determination, honesty and transparency.
- Respect the rights of executives or employees.
- Supervisors should behave in a way that is respected by employees and employees should not act disrespectfully towards the supervisors.
- Be disciplined and behave in accordance with the rules of the organization and good traditions whether stated in writing or not.
- Jointly create and maintain an atmosphere of unity and solidarity among employees and avoid any action that may affect the reputation, image of the Company or cause problems for the Company at a later date.

2.9 Sustainability Management Policy

The Company realizes the importance of operating its business for sustainable growth under Corporate Social Responsibility by emphasizing business operations with care for stakeholders, economy, society and environment with morality, ethics and code of conduct. The Group adheres to the corporate governance principles to ensure compliance with the laws relating to the prevention and resistance against fraud and corruption and hopes that conducting business under social responsibility and anti-corruption and bribery will bring benefits to the public together with the growth of the Group.

2.10 Reporting complaints and suggestions

2.10.1 All employees are obliged to report matters on discovery that other employees may be involved in various activities that violate the law or the Code of Conduct or make suggestions to the following persons/departments:

- (1) The head of the unit that the said employee is under.
- (2) Head of Human Resources: HR@addtechhub.com
- (3) Company Secretary: secretary@addtechhub.com

2.10.2 External complaint mechanism (external complainant) in order to uphold the Company's various missions and promote the Company's reputation, when employees are accused of violating the Code of Conduct, the following channels should be provided for the convenience of clarification and communication.

(1) Company Secretary: secretary@addtechhub.com

2.10.3 Anonymity and confidentiality

An employee or external complainant may choose to remain anonymous when reporting a violation of another employee, however, the Company encourages employee to identify themselves when reporting to facilitate contact and investigation. When an employee or external complainant has made a report, the receiving agency should take appropriate safeguards and preventive measures to enable effective investigations and to prevent such employee or external complainant from harassment or unfair treatment.

Monitoring to ensure compliance with the Code of Conduct

1. In the event that any violations of the law, rules, regulations, code of conduct or relevant Company policies are found, or an allowance for subordinates to conduct such violations, executives or employees must report directly to the Human Resources Department. The Human Resources Department shall continue to proceed according to the procedures set forth in the operating policies and procedures on this matter.
2. The Company's Code of Conduct shall be reviewed annually to ensure that it is appropriate for the changing business environment and circumstances.

This Code of Conduct and Operational Guidelines for directors, executives and employees has been considered and approved by the Board of Directors' Meeting No. 2/2024 on 6 March 2024 and is effective immediately.