



Code of Conduct

Thai Vegetable Oil Public Company Limited

Table of Content

	Page
Message from the Chairman.....	3
Policy and Guideline	
Section 1 Policy on the stakeholders.....	4
1.1 Practice policy and responsibility towards the shareholders.....	4
1.2 Policy on customers, consumers, and product quality.....	4
1.3 Policy on business partners	5
1.4 Policy on creditors	6
1.5 Policy on employees.....	6
1.6 Policy on business competitors	7
1.7 Policy on treatment of regulators	7
1.8 Employee behavior policy and treatment of other employees	8
1.9 Policy on treatment of the community, society and environment	8
Section 2 Policy on Personal data protection	9
Section 3 Financial reporting policy, internal control system and internal audit.....	9
Section 4 Policy on the use of inside information and the Company’s securities trading and confidentiality.....	10
Section 5 Policy on providing information and giving interviews to the media or to the public.....	13
Section 6 Policy on the use of the Company’s assets.....	13
Section 7 Policy on receiving and giving gifts and entertainment.....	13
Section 8 Conflict of interest policy	14
Section 9 Policy on the use of information technology, and intellectual property	15
Section 10 Political rights policy	16
Section 11 Policy in respecting human rights	16
Section 12 Anti-corruption policy	17
Section 13 Safety, occupational health, and working environment policy	19
Section 14 Compliancy, whistleblowing and disciplinary policy.....	20
Section 15 Anti-Money Laundering and Counter-Terrorism Financing Policy	21
Section 16 Penalty Provisions.....	21

Message from the Chairman

Thai vegetable oil public company limited conducts its business with honesty, integrity, transparency, morality, and ethicality by following a good corporate governance policy. The Company gives importance to fair treatment to all stakeholders, taking into account the society and environment to create sustainable business growth and value-added.

The board has therefore established this written “Code of Conduct” as a guideline, clarifying, explaining, and communicating to all directors, executives, and employees at all levels so that they can adhere to and perform their duties appropriately and correctly for the sake of the Company's sustainable growth.

- *Signature* -

(Dr. Suvit Maesincee)
Chairman of the Board
14 August 2026

Policy and Guideline

The Company is committed to conducting business legally to maximize the benefit for both shareholders and all stakeholders equally under the framework of a good code of conduct.

The Company has therefore established a set of guidelines written in the "Code of Conduct" manual for the purpose of clarity and convenience for directors, executives, and employees for acknowledgment including adhering to the operating guidelines that the Company expects to all stakeholders and society.

Section 1 Policy on the stakeholders

The Company values and respects the rights of stakeholders involved in operating the business, including shareholders, employees, customers, partners, creditors, debtors, competitors, communities, society, and environment, etc. The Company will abide by all applicable laws and regulations to ensure that the rights of all stakeholders are adequately protected.

1.1 Practice policy and responsibility towards the shareholders

Guidelines

- 1.1.1 Treat shareholders fairly and equally, perform duties with integrity as well as making decisions in all actions with honesty and fairness for the best interests of all shareholders.
- 1.1.2 Manage and operate to ensure the Company's prosperity, stability, and that it generates appropriate returns for the shareholders.
- 1.1.3 Regularly report to the shareholders on the situation of the Company, future trends, both positive and negative with the support of sufficient, complete and factual reasons where the information is accountable and can be disclosed transparently.
- 1.1.4 Provide various channels for information distribution, such as the Company's website, so that the Shareholders can conveniently access to the information. Make information easily comprehensible in both Thai and English as well as to establish an investor relations department to handle communications with shareholders and other stakeholders.

1.2 Policy on customers, consumers, and product quality

The Company operates under the corporate philosophy of growing with quality, stability, and sustainability and producing high-quality products that improve people's quality of life. Also, additional value for shareholders as well as consideration for the environment are incorporated. Therefore, the Company places a strong emphasis on product quality from the point of procurement of raw materials and production process to the point of delivery to clients. The Company has established a policy for treating customers and consumers fairly, abstaining from taking advantage of them, conducting business honorably, and attending to the needs of all stakeholders.

Guidelines

- 1.2.1 Develop and deliver standard, high-quality products that meet customer demands by utilizing modern and highly productive production technologies. Furthermore, the product quality inspection system is integrated in every phase with fair conditions. Regular follow-up and customer satisfaction development are also incorporated.
- 1.2.2 Provide sufficient and accurate product and service information to the customers in a timely manner to provide customers with useful information in making decisions. Any actions that may cause misunderstanding or mislead trust regarding the product quality must be prevented.
- 1.2.3 Keep customer information confidential and operate in accordance with the Personal Data Protection Act (PDPA), including not to use information illegally for your own or other related persons' benefit.
- 1.2.4 Promptly and efficiently attend to customer demands for optimum customer satisfaction.
- 1.2.5 Establish a procedure for handling consumer complaints and issues, making every effort to respond to customers promptly. This includes creating a form for customer satisfaction evaluation used for product and services development and improvement.
- 1.2.6 Do not pay any benefits to customers in order to acquire or compete for customers by the dishonest or illegal methods.

1.3 Policy on business partners

The Company is committed to operating a sustainable and high-quality business. Its purpose is to encourage partners to conduct business in a manner consistent with the Company's operational guidelines, treating business partners equally and considering mutual interests to maintain a sustainable relationship and mutual trust.

Guidelines

- 1.3.1 Business partners shall be treated equally, transparently, and fairly, based on obtaining fair compensation of both parties.
- 1.3.2 Strictly abide by the contracts, agreement, or various conditions made with the business partners. In the event that it is not practicable, the business partners must be informed in advance to jointly consider a solution and prevention of damages.
- 1.3.3 No privileges that represent business dishonesty shall be requested, received, or paid when negotiating business deals with customers.
- 1.3.4 Disclose information that is relevant, useful, accurate and complete on a regular basis.

- 1.3.5 Adhere to eco-friendly procurement regulations that specify precise guidelines and standards for choosing partners. This includes monitoring, inspecting, evaluating, and encouraging the potential and the capabilities of partners to develop sustainable business relationships.
- 1.3.6 Avoid purchasing products from trading partners that violate human rights.
- 1.3.7 No policy to support any person or organization. that conducts illegal business
- 1.3.8 Communicate the code of conduct and anti-corruption policy to business partners, and encourage them to implement or abide by it in their operations.

1.4 Policy on creditors

The Company strives to the policy of treating all groups of creditors equally and fairly by strictly adhering to the contracts and conditions with creditors as well as building relationships with them. Financial status is timely and accurately disclosed to build confidence and trust.

Guidelines

- 1.4.1 Comply with the contracts, regulations or various conditions agreed with the creditors strictly, especially the conditions regarding debt guarantees, appropriate structure of capital management, and default prevention measures. If compliance cannot be practiced, and a circumstance presents causing the Company to be unable to pay the debt on time, the creditors must be notified in advance in order to jointly consider and find solutions as well as prevent any damages that may occur.
- 1.4.2 Do not ask for or pay any benefits. that is dishonest in negotiating business with creditors.
- 1.4.3 Report financial information that is accurate and complete to the creditors in a timely manner on a regular basis. Do not conceal any crucial information or facts that could cause damage to creditors.

1.5 Policy on employees

Guidelines

- 1.5.1 Provide appropriate and fair compensation according to knowledge, ability, responsibility, and performance that is in line with the performance of the Company both in the short and long term.
- 1.5.2 Treat employees, including disabled and/or underprivileged persons, equally and fairly without discrimination in hiring, termination, compensation, welfare of employees, personnel development, workplace safety, and the right to collectively bargain for benefits
- 1.5.3 Appointment and transfer, including rewarding and punishing employees, must be done honestly and in accordance with their qualifications, skills, and performance.

- 1.5.4 Prioritize the development of employee knowledge, skills and abilities that align with the organization's strategic direction by providing employees with regular and thorough opportunities to do so.
- 1.5.5 Comply with laws and regulations related to employees while strictly adhering to fundamental human rights principles and the practice of respecting human rights.
- 1.5.6 Pay attention to recommendations and comments based on the expertise of employees.
- 1.5.7 The thoughts and suggestions of employees at all levels should have equal rights and be listened to. Complaints about work are taken seriously and corrected as far as possible so that all parties benefit and positive working relationships are encouraged
- 1.5.8 Encourage and uphold colleague unity and solidarity, and extend cooperation and collaboration that is advantageous to the task and the Company
- 1.5.9 Establish a provident fund and basic welfare according to the law or more as appropriate.

1.6 Policy on business competitors

The Company pursues a policy of fair treatment of business competitors within the framework of competition law. In the spirit of ethical and transparent business conduct, the Company will refrain from violating confidentiality or gaining unauthorized access to trade secrets of competing companies.

Guidelines

- 1.6.1 Adhere to the framework of good, fair, and honest competition by supporting and promoting free trade and opposing unfair competition.
- 1.6.2 Refrain from seeking competitors' confidential information through dishonesty or inappropriate means.
- 1.6.3 Avoid undermining the reputation of competitors in any way.
- 1.6.4 Avoid all actions that infringe the intellectual property of competitors.
- 1.6.5 Don't support monopolistic business practices of other entrepreneurs and don't suppress commercial competition.

1.7 Policy on treatment of regulators

The Company is committed to complying with the rules, regulations, criteria and procedures established in accordance with the law. In addition, the Company operates transparently and discloses accurate and complete information as required by the regulatory agencies.

Guidelines

- 1.7.1 Act and supervise to ensure the strict adherence to the spirit of the laws and regulations issued by the Company.

- 1.7.2 Refrain from anything that contributes to, supports or agrees with the circumvention of the law or various regulations
- 1.7.3 Cooperate with regulatory agencies and report information about violations or non-compliance with laws or regulations to those agencies.

1.8 Employee behavior policy and treatment of other employees

Guidelines

- 1.8.1 Perform duties with commitment, honesty, and transparency.
- 1.8.2 Respect the rights of other employees, including the management. Employees must not criticize in a way that is harmful, and they must not pass off the work of others as their own.
- 1.8.3 Superiors should behave respectfully towards employees, and employees should not perform actions that are disrespectful towards superiors.
- 1.8.4 Employees must be disciplined and behave in accordance with the Company's regulations and good traditions, regardless of whether these are set out in writing or not.
- 1.8.5 Cooperate to create and maintain an atmosphere of unity and solidarity among colleagues.
- 1.8.6 Refrain from giving or expressing opinions to outsiders or the media, or any action that could damage the Company's reputation and image or subsequently cause a problem for the Company

1.9 Policy on treatment of community, society and the environment

The Company values community and social participation, and cares for the environment.

Guidelines

- 1.9.1 Responsible for and adhering to environmental conservation as well as the customs and local traditions of the area where the organization is settled.
- 1.9.2 Support and carry out various activities that are consistently beneficial and creative for the community, society, morality and the environment
- 1.9.3 Avoid mishaps and limit the release of waste to a level that is not below the acceptable standard values.
- 1.9.4 Encourage employees to work together and become aware of the need to take care of and take responsibility for the environment, society, and community.
- 1.9.5 Encourage the efficient use of resources, including raw materials, water, energy, and other materials. To further lessen the influence on the environment, waste management and the reduction of greenhouse gas emissions are also incorporated.
- 1.9.6 Pay attention to community feedback on issues that could impact the community, including encouraging businesses and communities to coexist sustainably.

- 1.9.7 Respond quickly and effectively to events from the Company's operations that impact the community and the environment by cooperating fully with the relevant authorities and government representatives
- 1.9.8 Consider sourcing raw materials or allocation of resources for the business operation by taking into account the impact on the environment as a priority.
- 1.9.9 Operate in accordance with laws, standards, regulations and various social and environmental practices to avoid or reduce social and environmental impacts.
- 1.9.10 Respect the rights of community members to own land and other property and protect their ability to obtain a variety of natural resources. Any acquisition, use, or negotiation regarding land and property will be conducted based on the principle of free and informed consent, with sufficient information and notice provided to the community to make an informed decision.
- 1.9.11 Disclose information on the works on community, society, and the environment in a transparent manner through various channels as appropriate and give opportunities for communities and stakeholders to participate in expressing ideas for projects that may affect the community, society, and environment.

Section 2 Personal data protection policy

Guidelines

- 2.1 The Company respects privacy rights and protects personal information of the owners of such information, regardless of the person being an employee, customer, business partner, competitor, or relevant stakeholder.
- 2.2 Collection, use or disclosure of personal information must be done sparingly, under lawful purposes, and in strict compliance with the law on personal data protection.
- 2.3 Employees are obliged to inform the owners of personal data about the details of the collection of personal data, including obtaining the consent of the data owner for use or disclosure
- 2.4 The Company has appropriate security measures to prevent loss, unauthorized access, and illegal use, alteration, or disclosure of personal information.

Section 3 Financial reporting policy, internal control system and internal audit Guidelines

Guidelines

- 3.1 The Company's management is responsible for preparing accurate, complete, timely and reliable financial reports of quarter and annual financial statements, which shall be prepared in accordance with generally accepted accounting standards. This includes the monitoring and evaluating of the financial status of the business, financial liquidity, and debt servicing ability as well as preparing management discussion and analysis that reflects the concept of sustainable business operations of the Company.

- 3.2 Set up a control system and internal audit that is effective enough to ensure the Company has followed the standard and various laws related, under the scrutiny of the internal auditor and review by the audit and risk management committee, and to practice an appropriate risk assessment in order to assess the risks that may affect the Company's operations.
- 3.3 Establish an internal audit department, which is an independent agency that is directly responsible to the audit and risk management committee, to perform efficient internal audit duties.

Section 4 Policy on the use of inside information and the Company's securities trading, and confidentiality

The Company considers it the responsibility of directors, executives, employees, including temporary employees, and related parties (spouses and minor children) to strictly safeguard the Company's confidential information, particularly internal information that has not yet been disclosed to the public, or information that affects business operations or the price of the Company's securities as follows:

- 1) The Company is committed to complying with the laws relating to the trading of securities using inside information that affects the price of securities in every country where the Company operates or intends to operate.
- 2) Directors, executives, employees, and external persons performing duties for the Company who know of or possess the Company's inside information must:
 - 2.1) Keep the Company's inside information with care and in a secure manner, to prevent it from leaking outside the Company
 - 2.2) Not disclose inside information, whether directly or indirectly, to any other person not involved in the relevant work, in order to prevent such information from being used for the benefit of themselves or others, as this may affect the price or value of the Company's securities or those of other listed companies related to the inside information, or may affect investment decisions.
- 3) Directors, executives, employees, and external persons performing duties who know of, possess, or hold a position in a line of work involved in duties relating to such inside information must not buy or sell securities, or enter into any derivatives contract relating to securities connected with inside information that has not yet been disclosed to the public, unless such action does not take unfair advantage of other persons in the manner prescribed by the Securities and Exchange Commission.
- 4) Directors, executives, and employees in departments related to inside information, as well as related persons, must comply with the prescribed measures prohibiting the trading of securities during the period before and after the disclosure of inside information (the "Blackout Period"), in order to prevent the risk of the improper use of inside information.
- 5) The Company must establish a system for the retention and protection of inside information to ensure that inside information will not be leaked and will not be used to benefit the buying or selling of securities, whether for oneself or others.

6) Directors, executives, and employees have a duty to strictly comply with the charter, Code of Conduct, the corporate governance policy, the authorization of action, and other related policies, including the guidelines on the use of inside information under the Securities and Exchange Act and the Public Limited Companies Act B.E. 2535 (as amended), as well as other relevant regulations.

Guidelines

Directors, executives, and employees are prohibited from using the Company's material inside information for their own benefit or that of others in buying or selling the Company's securities, or from disclosing inside information to uninvolved external parties, where such information has not yet been disclosed to the Stock Exchange of Thailand.

4.1 Securities trading by directors and executives

4.1.1 Directors, executives, and employees who are aware of inside information are prohibited from buying or selling the Company's securities during the period of one month prior to the disclosure of the financial statements or the Company's status, including other important information. They also have to wait at least 24 hours after disclosure to the public (Blackout Period) and notify the company secretary at least 1 business day in advance before such buying or selling of the Company's securities.

4.1.2 Directors and executives (at the level of Assistant Managing Director and above) are responsible for reporting changes in the securities holdings of the Company held by themselves and by related persons to the Office of the Securities and Exchange Commission (the "SEC"), in accordance with Section 59 of the Securities and Exchange Act (the latest version), including any future amendments thereto, within 3 business days from the date of the change in the securities holdings of the Company, in order to prevent the buying or selling of securities using inside information.

For this purpose, "related persons" means persons who have a relationship with the directors and executives of the Company, namely:

- (a) A spouse, or a person who cohabits as husband and wife;
- (b) A minor child
- (c) A juristic person in which the director, executive, or the persons under (a) and (b) hold, in aggregate, shares carrying more than 30 percent of the total voting rights of such juristic person, and hold the largest proportion of shares in that juristic person.

4.1.3 Directors and executives are responsible for reporting their securities holdings and any changes in every time to the board of directors' meeting for their acknowledgement.

4.2 Inside information management system

4.2.1 Maintain a list of persons with access to inside information (the "Insider List") specifying the access level of each individual, and establish a systematic process for compiling and retaining such list.

-
- 4.2.2 Control access rights for both internal and external persons so that access to information is granted only to the extent necessary for the performance of duties, rather than according to position or seniority (on a Need-to-Know Basis), and limit the number of persons who may access the information to the minimum necessary.
- 4.2.3 Company personnel are responsible for protecting sensitive documents and private information of the Company and its partners, and adhere to strict protocols for each level, category, and type of data. It is essential to ensure the secure and appropriate storage of certain documents and information.
- 4.2.4 Store information according to timeframes and standards set by the Company or by law. The information must be stored carefully and systematically so that it is easy to use. The relevant employees are obligated to destroy such documents or information using the techniques appropriate to the information or each type of document when the time frame for which they must be retained has expired.
- 4.2.5 Maintain equipment, data storage systems, and access rights management systems in a secure manner appropriate to the confidentiality level of the information, by establishing, reviewing, suspending, and revoking access rights in accordance with approvals, covering internal systems, external connections, and third-party service provider systems.
- 4.2.6 Maintain the security of the storage, transmission, and access of information through electronic systems, including mobile devices and external access, using measures established by the Company that allow for retrospective auditing, and be able to promptly suspend or revoke access rights and control or delete the Company's data in accordance with the law and the Company's regulations.
- 4.2.7 Communicate to employees the Company's right to monitor communications through the Company's systems, in order to prevent the use of inside information in securities trading.
- 4.2.8 Ensure that employees return inside information to the Company and acknowledge their continuing confidentiality obligations upon leaving employment.
- 4.2.9 Persons who cease to be directors, executives, employees, or temporary employees of the Company remain bound by the obligation to maintain the confidentiality of inside information and by the restrictions on securities trading until the Company has disclosed such information to the public.
- 4.2.10 Communicate and provide knowledge on policies relating to the prevention of the misuse of inside information to directors, executives, and employees, in order to raise awareness of the importance of information disclosure, the safeguarding of inside information, and the prevention of securities trading using inside information for the wrongful benefit of oneself or others, which would cause damage to shareholders as a whole.

Section 5 Policy on providing information and giving interviews to the media or to the public

Guidelines

- 5.1 Disclosure of Company information must comply with the criteria and regulations of the Stock Exchange of Thailand which include criteria, conditions and procedures regarding the disclosure of information and any operations involving listed companies. This also includes revealing important information such the Company's financial and non-financial information accurately, completely, timely, and transparently in compliance with the requirements of the Securities and Exchange Commission (SEC) and other relevant laws strictly
- 5.2 The Company appoints the Chief Executive Officer and the Managing Director as authoritative figure in interviews or answer questions from shareholders, investors, media, and outsiders. The Chief Executive Officer and Managing Director may appoint other persons as representatives (Acting only for assigned matters)
- 5.3 The Company designates Investor Relations as its representative in providing useful information to shareholders, securities analysts, fund managers, investors, financial institutions and the general public.

Section 6 Policy on the use of the Company's assets

The Company's assets include tangible and intangible assets such as movable property, real estate, technology, production formulas, copyright documents, patents, and copyrights, etc.

Guidelines

Employees have the duty and responsibility to protect the Company's assets from deterioration and loss and to use them efficiently in order to maximize the benefit to the Company. It is forbidden to use the Company's assets for one's own benefit or for the benefit of others.

Section 7 Policy on receiving and giving gifts and entertainment

The Company has a policy of not receiving gifts, property or other benefits in all cases. The granting of gifts, property, or other benefits including entertainment, It can be done in an appropriate manner in accordance with tradition to express good relations. However, this must not influence decision-making in the performance of duties or create incentives that lead to unfair decisions by employees.

Guidelines

- 7.1 Directors, executives, employees of the Company and/or their families shall not, under any circumstances, request or accept gifts or any other privileges from the contractor, subcontractors, customers, partners, or other parties related to the Company's business that may influence decisions while executing tasks on duty or create a conflict of interest.
- 7.2 Directors, executives, employees of the Company shall refrain from receiving gifts, assets or any other privileges under all circumstances as well as conveying the message of such practices to all third parties.

- 7.3 Giving of gifts, souvenirs, or any other benefits must be reported and approved as follows:
 - 7.3.1 For values not exceeding 3,000 Baht per person per occasion: Approval must be sought through the line of command up to the Manager level.
 - 7.3.2 If it is necessary to provide a gift valued at more than 3,000 Baht per person per occasion to build relationships and a positive corporate image: Procedures must follow the Delegation of Authority (DOA) and the standard operating procedures of the Accounting and Finance Department manual.
- 7.4 Contributions for weddings, ordinations, Kathin/Pha-pa (merit-making), hospital visits, or retirement/appreciation ceremonies shall be handled as follows:
 - 7.4.1 For gifts in the form of items or cash not exceeding 3,000 Baht: Follow the same procedure as Clause 7.3.1. If the value exceeds 3,000 Baht, follow the procedure in Clause 7.3.2, and supporting evidence such as an invitation card must be attached.
- 7.5 Provision of financial support and/or funeral wreaths shall follow these practices:
 - 7.5.1 If the value of financial support and/or wreath does not exceed 3,000 Baht, follow the procedure in Clause 7.3.1. If the value exceeds 3,000 Baht, follow the procedure in Clause 7.3.2. In this case, issuance of a cheque is not required, but supporting evidence, such as a funeral invitation card or a photograph of the funeral program, must be attached.
- 7.6 Entertainment spending for business entertainment can be done reasonably and shall not affect the operational judgement or lead to a conflict of interest.
- 7.7 It is prohibited to give gifts, souvenirs, or any other privileges including organizing an entertainment reception that may influence or motivate a decision that may result in unrighteous work execution or affect the Company's operation.
- 7.8 Giving gifts, souvenirs, or any other benefits and business entertainment must be approved by the supervisor based on the employment level in accordance with the regulations on approval and procedure authority, and the code of conduct of finance and accounting department. Evidence of expenditures showing the value of that asset, service or entertainment reception is required for inspection.

Section 8 Conflict of interest policy

Conflict of interest

Conflict of interest means performing duties prioritizing benefits to oneself or other related persons rather than the Company's objectives and benefits. This prevents the Company from maximizing its benefits or could harm the Company and lead to problem.

Directors, executives, and employees must avoid from any actions that could jeopardize the interests of the Company, such as interacting with trading partners or taking advantages of opportunities or insider information from being Directors, Executives or employees for personal benefit. This includes trading in the firm's stocks, doing work that is different from the Company's work, and conducting business in competition with the Company.

Guidelines

- 8.1 Avoid transactions that are related to yourself or are considered connected transactions according to the Thai Stock Exchange's announcement which may lead to conflicts of interest with the Company. However, it is an exception if it is necessary to make transactions for the benefit of the Company. In this case, the transactions must be conducted as if it were a transaction with a third party.
- 8.2 If the Director, Executive, or employees take the position of director, partner, or advisor in a legal entity or other organization such as a government organization or the private sector, the exercise of that position must not conflict with the interests of the Company and the performance of duties in the Company.
- 8.3 In case it is a connected transaction defined by the requirements of corporate governance agencies such as the Securities and Exchange Commission (SEC) or the Stock Exchange of Thailand, etc., the rules, procedures and disclosure of information on connected transactions of listed companies must be strictly complied with.
- 8.4 Related transactions must be reviewed or considered by the Company's audit and risk management committee and the Board of Directors, respectively. If there are audit and risk management committees or Company directors involved in connected transactions, they are not allowed to participate in reviewing the connected transaction.
- 8.5 If you witness conflict of interest or a potential conflict of interest, you must report information to make a complaint to the responsible agency according to the channels for reporting set by the Company in the complaint regulations
- 8.6 The Company organizes training to impart knowledge and guidelines on preventing conflict of interest for Directors, Executives, and employees, and regularly monitors compliance with relevant policies.

Section 9 Policy on the use of information technology, and intellectual property

The rights of intellectual property owners must be respected and not violated by any executives or employees, and abide by the law. No trademark infringement, no copyright violations, and no use of others creations for personal gain that could harm the Company.

Guidelines

- 9.1 The Company encourages executives and employees to use internet media for the benefit of work. Executives and employees must not take any actions which interfere with the computer system and the internet of others in the office.
- 9.2 Executives and employees are expected to use computers and information technology in accordance with the Computer Crime Act 2007.
- 9.3 Executives and employees should avoid using the Company's computer system to disseminate information that is inappropriate in morality, customs and traditions, and

laws as well as not taking any actions that cause damage to national security and safety. They should refrain from presenting issues that may cause conflicts to society or exaggerating the communication to mislead consumers in terms of the quality of products or services.

- 9.4 Executives and employees are expected to work by using copyrighted computer programs. Installation and use of computer programs that are not copyrighted is strictly prohibited in the office.
- 9.5 Management and employees should avoid actions to destroy, alter or add to any or all parts of computer data that may cause damage to the data or the computer system.
- 9.6 Executives and employees must protect and maintain their own accounts, username, and password by not sharing such information with others. These items must not be distributed, disseminated, or permitted for others to have access.
- 9.7 Executives and employees must comply with the security measures of the Company's information system to prevent the theft of sensitive or confidential information of the Company.
- 9.8 Allocate and manage information technology resources sufficiently for business operations. Effectively use company assets to develop work potential in order to maximize the benefits of the Company and set guidelines to accommodate in the event that sufficient resources cannot be allocated as specified. It is prohibited to use the Company's assets for personal gains.

Section 10 Political rights policy

Guidelines

- 10.1 The Company is a politically neutral organization that does not support political activities of political parties, political groups, or any politicians either directly or indirectly.
- 10.2 Executives and employees shall exercise their rights as good citizens according to the constitutional law and other related laws and should adhere to a democracy with the King as the Head of State.
- 10.3 Executives and employees have the right to participate in political activities in their own names on their own behalf, not on behalf of the Company. The Company's resources must not be used to support political activities of political parties, political groups, or any politicians.
- 10.4 Management and employees should avoid expressing political opinions that will lead to conflicts within the Company.

Section 11 Policy in respecting human rights

Human rights mean human dignity, fundamental rights and freedoms that are inherently linked to equality, fairness and freedom from discrimination. This includes respect for differences in origin, race,

nationality, religion, creed, ethnicity, age, generation, education, gender, gender identity, sexual orientation, ideology, disability or any other status protected by the Constitution of the Kingdom of Thailand and international treaties.

Guidelines

- 11.1 The Company operates its business on the basis of respect for human rights principles, without any violation of human rights and related laws.
- 11.2 The Company has a policy to educate employees on the subject of human rights principles in order for the employees to abide by human rights principles in their work.
- 11.3 The Company treats employees on the basis of humanity, respects individual rights of the employees, including the right to life and right of opinion and freedom of expression.
- 11.4 The Company offers equal opportunities in employment without discrimination of gender, disability, religion and other disadvantaged groups.
- 11.5 The Company monitors business operations in accordance with the principles of human rights, without any forced or unlawful child labor and without acts of oppression, intimidation, threats or insults, both physical and verbal, that could cause resentment or fear. This includes direct and indirect punishment, physical or mental cruelty to employees or any form of violence.

Section 12 Anti-corruption policy

Directors, executives, and employees of the Company do not solicit, engage in, or tolerate corruption in any form directly or indirectly, for the benefit of the Company, themselves, their families, friends and associates, which includes all business and related departments. In this regard, compliance with the anti-corruption policy is regularly reviewed as is the review of practice guidelines and operational requirements to comply with business changes, rules, regulations and legal requirements.

Guidelines

- 12.1 Directors, executives, and employees at all levels must comply with the anti-corruption policy and the code of conduct of the Company and shall not pursue or become involved in any form of corruption either directly or indirectly for the benefit of the Company, oneself or one's family, friends, and acquaintances.
- 12.2 The Company's employees shall not ignore or disregard actions that fall within the scope of corruption associated with the Company if witnessed and must notify the supervisor or the person in charge as well as provide cooperation in the investigation of various facts. If there are any questions or inquiries, the matter shall be consulted with the supervisor, Office of the Internal Audit or a person designated as responsible for monitoring compliance with the Company's code of conduct through various channels set out in the Anti-corruption manual
- 12.3 The Company will ensure fair treatment and protection of employees who refuse to accept, or report corruption related to the Company in accordance with the measures

to protect the complainant or the person who cooperates in the investigation as specified by the Company in the complaint regulations without demotivating, punishing, or giving any negative consequences that may affect their duties even if doing so would cause the Company to lose business opportunities.

12.4 A person involved in acts of corruption, which is an offense against the Company's code of conduct and is against the law, must be considered for disciplinary action as specified by the Company. This may include termination of employment, compensation for damages, and civil or criminal penalties.

12.5 The Company is committed to creating and maintaining a corporate culture and believes that corruption is unacceptable in both public and private transactions.

12.6 The Company realizes the importance of disseminating knowledge and understanding of anti-corruption policies and measures by providing communication training both for communications within the Company and with other persons or companies that are required to work together with Company or may affect the Company in matters that must be observed in accordance with the anticorruption policy.

12.7 The Company's directors, executives and employees at all levels shall not receive gifts, assets or any other privileges under any circumstances and shall be cautious about giving gifts, assets or any other privileges including entertainment receptions. In this regard, the offering must be in accordance with traditions and at a value not exceeding 3,000 baht per person per opportunity, or on an important business occasion and must not affect decision-making in performing duties.

12.8 Charitable contributions and funding must be transparent and legal by ensuring that the donation and the funds are not used as an excuse for bribery.

12.9 Risk assessment is the foundation of anticorruption measures. The Company provides an assessment of corruption risks that may occur to the Company at least once a year and report to the board of directors including review of anticorruption measures to ensure appropriateness and prevent the risk to an acceptable level.

12.10 The Company has set up an internal control system covering financial aspects, accounting operational procedures and record-keeping processes, including other processes that are at risk of corruption and to regularly review the said internal control system to ensure that internal control on areas with risks of corruption remains effective.

12.11 The Company has arranged to have monitoring and auditing as follows:

a. The Office of Secretariat annually reviews the appropriateness of the anti-corruption policy and proposes to Environmental, Social, and Governance Committee (ESG Committee) and the Board of Directors for consideration and approval in case there are any changes, including supervising and monitoring the implementation of this policy. In this regard, if any updates are required, it must be done as soon as possible.

- b. **The Office of the Internal Audit** regularly reviews the internal control system and its processes to ensure that the internal control system is effective against corruption; the results of the audit will be discussed with relevant persons to determine appropriate corrective action and will be reported to the management and the audit and risk management committee for their acknowledgement.
- c. Provide ongoing training to employees to gain a real knowledge and understanding about anticorruption measures and guidelines, including penalties for failing to comply with this measure.

Section 13 Safety, occupational health, and working environment policy

The Company provides a safe working environment and promotes good health for employees including appropriate working hours in compliance with relevant safety and occupational health laws and regulations. This includes operations involving all groups of stakeholders. Therefore, the "Quality, Safety, Occupational Health and Working Environment Policy" has been established as follows.

- 13.1 Consideration for quality, safety, and occupational health in the workplace is the duty and responsibility of everyone, including employees, partners, contractors and visitors who must strictly comply with related laws and regulations.
- 13.2 To demonstrate commitment to the prevention of loss and work-related illness in all cases, safety objectives, indicators, and targets are set, and accident prevention guidelines are communicated to those who involved so that they can behave correctly.
- 13.3 Develop a management system for safety, occupational health and working environment in accordance with laws, international standards and other requirements that the Company can apply to create a continuous and sustainable safety culture in the Company.
- 13.4 Provide adequate resources for operations, including personnel, budget, working hours, tools and necessary equipment. Training of appropriate and adequate handling of emergency situations are also organized.
- 13.5 Monitor and evaluate suppliers' performance in the area of quality, safety, occupational health, and working environment throughout the supply chain to achieve earnest practice. Also, there is a risk management system for the entire organization which includes the control of various operations to reduce the possibility of damage to the Company. In addition, the proactive measures and internal audit are established to ensure safety, occupational health, and a good working environment for employees and relevant stakeholders
- 13.6 Enhancing employees' awareness of the importance of safety, occupational health, and a good working environment. Encouraging employees to participate in relevant projects and granting them the right to express opinions in order to improve the working environment and how to work safely.

13.7 Continuously review the policy and take into account the impact on stakeholders and appropriateness to the current situation.

Section 14 Compliance, whistleblowing and disciplinary policy

The Company determines it as the duties and responsibilities of directors, executives, and all employees to study, understand and strictly follow the code of conduct.

Employees and all groups of stakeholders, both inside and outside the Company, have the opportunity to file complaints about questionable working practices, including illegal, unethical, corrupt, or rights-violating acts, inaccurate financial reports, or faulty internal control systems.

If any employees have any questions regarding the practice or suspicion of misconducts, the employee shall ask for advice from the supervisor according to the employment hierarchy. Employees who violate the code of conduct or allow subordinates to violate the code of conduct will be considered for disciplinary action. This may include warnings, suspension, termination, compensation for damages and civil or criminal penalties and others as appropriate.

Whistleblowing Channel

If employees witness or have information on inappropriate behaviors, the misuse of inside information, breach, or failure to comply with the law, code of conduct, including any company regulations, such behaviors can be brought up and reported through the following channels:

Internal Audit Office

Postal channel	Thai Vegetable Oil Public Company Limited No. 149 Ratchadapisek Road (Thapra-Taksin) Bukhalow, Thonburi, Bangkok 10600
Telephone	02 477 9020 Ext. 9419
E-mail	ac@tvothai.com or

Chairman of the Audit Committee

Postal channel	Thai Vegetable Oil Public Company Limited No. 149 Ratchadapisek Road (Thapra-Taksin) Bukhalow, Thonburi, Bangkok 10600
E-mail	acchairman.tvo@gmail.com

The Company discloses guidelines for complaints and whistleblowing, such as gathering facts and filtering information, investigation of facts implementation measures, reporting results, etc., including measures to protect complainants and whistleblowers. or those who refuse to commit corruption, penalties and guidelines for preventing recurrence in the "**Whistleblowing Policy**" which are published on the Company's website under the topic "Corporate Governance".

Investigation process and disciplinary actions

The Company will appoint an investigation committee on a case-by-case basis and the results of the review shall be reported to the board to determine appropriate measures. The Company has policies and guidelines to protect information providers or whistleblowers whereby the information and evidence of the complainant are kept confidential. The information shall not be disclosed to unrelated parties, unless it is a disclosure required by the law.

Section 15 Anti-Money Laundering and Counter-Terrorism Financing Policy

The Company shall act with due care to ensure it does not become a tool for money laundering or the financing of terrorism. Priority is given to monitoring and reporting suspicious activities to the relevant authorities in the event of any unlawful acts. Furthermore, all financial transactions and facts regarding assets must be accurately recorded in compliance with both Thai and international laws.

Section 16 Penalty Provisions

Any person who breaches this Code of Conduct shall be subject to disciplinary consideration in accordance with the Company's regulations, and may be subject to penalties under relevant laws, including the law on securities and exchange and other applicable laws.

Note: Approved by the resolution of the Board of Directors' Meeting No. 7/2025, dated 19 December 2025. Amendment No. 1 approved by the resolution of the Board of Directors' Meeting No. 5/2026, dated 14 August 2026.

The Company reviews the Code of Conduct every 2 years to make it appropriate for the circumstances and the business environment that may change.