

### Definitions

Business Ethics	Means	Best Practices in Business Operations
Company	Means	Rhombho Property Public Company Limited including its subsidiaries, affiliates, other companies under its control, and business representatives.
Director	Means	Company Director
Executive	Means	Chief Executive Officer (CEO) down to the Section Manager level
Employee	Means	Employees from the Assistant Section Manager level or equivalent downward, including permanent employees, temporary employees, and contract-based employees.
Assets	Means	Tangible and intangible assets, including real estate, technology, copyrights, legal documents, patents, and the Company's inventions.
Company Information	Means	Information owned or controlled by the Company, which holds economic value both currently and in the future.
Stakeholders	Means	Individuals and/or legal entities involved in the Company's business operations, including shareholders, employees, partners, business competitors, customers, creditors, as well as communities and society.
Conflict of Interest	Means	Engaging in any activity that may involve personal interests, whether of the individual or related parties by blood or otherwise, influencing decision-making, or potentially obstructing or hindering the pursuit of the greatest benefit.
Confidential Information	Means	Non-public information or information that, if disclosed to the public or falls into the hands of competitors, could have a severe impact on the Company, including information provided by partners and customers of all types.
Corruption	Means	The abuse of power to obtain improper benefits, including offering or accepting bribes in any form, whether through offers, contracts, promises, demands, money, assets, positions, or using existing assets inappropriately with government officials, government agencies, private entities, or any responsible parties, whether directly or indirectly, to induce such individuals to act or refrain from acting in a way that benefits oneself, family, friends, or related parties. This does not apply when permitted by laws, regulations, announcements, local customs, or commercial practices.



## **RHOM BHO PROPERTY PUBLIC COMPANY LIMITED**

### **Vision**

We are committed to creating communities that live in harmony with the tourist industry.

### **Missions**

- To promise good governance and focus in good morals and ethics in accordance with Buddhist principles
- To create quality products that exceed the expectations of our residents
- To create a community and environment that is compatible with nature
- To guarantee after-sale support to ensure continuous quality service and to maintain the confidence of our residents
- To control and supervise operations in order to meet targets and maximize the return of profits to shareholders

### **Code of Conduct**

#### **Code of Ethics for Business Operations of the Company**

##### **1. Compliance with Laws and Company Regulations**

The company must comply with all relevant laws, regulations, and government directives. Any internal rules, policies, or practices must be updated to ensure they align with legal requirements. The company must avoid any involvement in illegal activities or those that conflict with public order or moral standards. The use of company employees or assets for unlawful purposes is strictly prohibited.

- 1.1 Must comply with the laws and regulations of the company accurately and in full.
- 1.2 Violating the law, shareholders' resolutions, board resolutions, company regulations, rules, or orders, under the pretext of increasing profits for the company or for any other reason, is not an acceptable justification.
- 1.3 The company must conduct business with honesty and integrity, considering the legitimate interests of the company, even in the presence of legal gaps, regulatory gaps, or any deficiencies in rules or orders.

##### **2. Treatment of Shareholders**

The company is committed to being a good representative of its shareholders, recognizing that shareholders are the owners of the business. Therefore, in its operations, the company strives to create the highest level of satisfaction for shareholders, focusing on the company's growth based on integrity and ethical principles. The board of directors will perform its duties with honesty and integrity. Any decisions made by the board must prioritize the interests of the shareholders, ensuring fairness and equity in all actions taken towards all shareholders. The following are the guidelines for practice:

- 2.1 Perform duties with honesty and integrity, and make decisions with caution, thoroughness, equality, and fairness toward both major and minor shareholders, for the overall benefit of all shareholders.

- 2.2 Comply with the law, company regulations, policies, shareholder meeting resolutions, and adhere to the best practices of corporate governance.
- 2.3 Report information, news, data, and the company's status to all shareholders regularly and equally, providing complete and truthful information—both positive and negative—at the appropriate time and in a manner sufficient for all shareholders to make informed decisions on an equal basis.
- 2.4 Manage the company to achieve its objectives both in the short-term and long-term efficiently and effectively, while ensuring its competitiveness.
- 2.5 Ensure that directors, executives, and employees do not seek personal benefits, or those of their family or close associates, from any material information of the company that has not been publicly disclosed, and prevent them from disclosing such information to external parties and/or engaging in actions that may lead to a conflict of interest with the company.
- 2.6 Ensure the management and protection of the company's assets to prevent any improper depreciation or loss.

### **3. Treatment of Customers**

The company is committed to ensuring customer satisfaction and confidence, which directly impacts the success of the business. Therefore, the company continually seeks ways to effectively and efficiently meet customer needs. It has established a post-sales customer service management system to maintain long-term positive relationships with customers. Therefore, the following guidelines have been established:

- 3.1 Deliver products and services of high quality that meet or exceed customer expectations, under fair terms and pricing. These products and services must be safe, not harmful to the health of customers, and reliable. Additionally, customers' rights to access the company's products and services must not be restricted, and fair commercial terms should be established for customers.
- 3.2 Provide accurate, sufficient, and timely information, and communicate product or service details to customers, ensuring that important details are clearly and truthfully stated in accordance with the actual facts. This is to prevent any misunderstanding by customers regarding the quality, quantity, or any conditions of the products or services, without distorting the facts.
- 3.3 Engage with customers politely, effectively, and in a manner that builds trust. Additionally, respond promptly to customer needs to ensure maximum customer satisfaction.
- 3.4 Implement measures to protect personal data and maintain customer confidentiality in accordance with the Personal Data Protection Act and relevant laws. Ensure that customer information or secrets are not used for personal gain or by related parties inappropriately. Customer information will not be disclosed without the customer's consent or prior approval from authorized company representatives, except when required to be disclosed to external parties for clarification or legal action. Additionally, provide channels and processes for handling customer complaints related to personal data.

3.5 Create documents to introduce the service team to customers after rental and transfer of ownership, and follow up to inquire about customer satisfaction. Strengthen relationships with residents and support customers' efforts in corporate social responsibility and environmental sustainability.

3.6 Provide channels for customers to offer suggestions, file complaints or grievances related to the company, or request assistance and advice on matters related to the company.

#### **4. Treatment of Employees**

Employees are considered the company's most valuable resource and a key factor in its success. Therefore, the company is committed to developing and fostering a positive organizational culture and work environment. It promotes teamwork and creates a sense of love and unity within the company, while ensuring that employees are treated with integrity. Additionally, the company places clear and tangible importance on employee safety, health, and the work environment. Therefore, the following guidelines have been established:

- 4.1 Treat employees with courtesy and respect their dignity, integrity, individuality, and human rights.
- 4.2 Protect employees' personal information by limiting its disclosure and use, such as family history, salary, performance evaluations, and medical records, to only those within the company who need it. Personal employee information will not be disclosed to external parties without the employee's consent, unless it is required for clarification or legal action involving relevant external parties.
- 4.3 Provide equal opportunities in hiring, appointments, transfers, as well as awarding or considering merit and employee discipline, with sincerity and based on the employee's knowledge, skills, suitability, and company regulations, without regard to gender, nationality, race, religion, or beliefs.
- 4.4 Provide fair compensation to employees, higher than the legal minimum, both in the short and long term, based on the company's performance and the employee's work performance. The company will manage wages, salaries, benefits, and welfare in accordance with industry standards to attract and retain knowledgeable and skilled personnel.
- 4.5 Ensure a safe working environment for the life and property of employees at all times, and maintain good hygiene in the workplace. Provide employee benefits and entitlements such as provident funds, healthcare, annual health checkups, marriage allowances, funeral benefits, accident insurance, and health insurance, etc. Additionally, communicate to employees the continuous use of these benefits to maintain a high quality of life for all employees.
- 4.6 Place importance on developing and enhancing skills and potential to prepare employees for career growth, providing opportunities for them to learn comprehensively and consistently.
- 4.7 Strictly adhere to all laws and regulations related to employees and avoid any actions that are unfair or may negatively impact employees.
- 4.8 Foster and cultivate a positive mindset among employees, encouraging sharing, being giving, respecting each other's opinions, and being good citizens of society.

4.9 Establish policies regarding safety, health, and the work environment for employees, and ensure that employees consistently adhere to these policies. The safety policies are as follows:

- 4.9.1 Commit to supporting the company's activities while ensuring compliance with safety laws and other related regulations.
- 4.9.2 Establish that workplace safety is the top priority and responsibility in the performance of all employees' duties.
- 4.9.3 Require all levels of management to set a good example, lead, train, and motivate employees to work safely.
- 4.9.4 Require all employees to prioritize their own safety, the safety of their colleagues, and the protection of the company's assets at all times while performing their duties.
- 4.9.5 Require all employees to maintain cleanliness and organization in their work areas at all times.
- 4.9.6 Commit to supporting safety activities that encourage, promote, and develop employees' awareness of workplace safety.
- 4.9.7 Commit to supporting the continuous review, improvement, and development of the safety management system.
- 4.10 The company provides opportunities for employees to participate in sharing opinions to improve work processes, offer feedback on employee benefits, and encourage the creation of relationships between departments within the organization.

## **5. Treatment of Creditors**

The company has a policy of fair and responsible conduct towards creditors, taking into account the best interests of the company while adhering to fairness. It seeks to avoid situations that may lead to conflicts of interest and remains committed to fulfilling agreements or contracts. The company ensures that accurate and truthful information is provided at all times, promoting fairness for both parties. Therefore, the following guidelines have been established:

- 5.1 Utilize loans approved by creditors or financial institutions for the purposes intended by the company, as stated to the creditors or financial institutions.
- 5.2 Repay debts to creditors on time according to the specified terms, strictly adhere to the conditions set by creditors or financial institutions, especially regarding guarantee conditions, and maintain the quality of assets pledged as collateral as required by the creditors.
- 5.3 In the event of significant circumstances that may impact the financial status and affect debt repayment, the company will notify creditors to jointly find preventive or corrective measures to avoid potential damage.

## **6. Treatment of Business Partners and Contractors**

The company has a policy to treat business partners fairly and equitably, and establishes guidelines for procurement practices that are just and impartial. All actions must consider the reputation, legal compliance,

regulations, and important customs and practices. Additionally, the company adheres to its commitments with business partners, ensuring equality in business operations and mutual benefits with partners. Therefore, the following guidelines have been established:

- 6.1 The company establishes transparent and fair criteria for selecting customers, considering the business sustainability potential of partners. This includes delivering products of high quality that meet standards, are timely, and comply with labor laws and human rights principles.
- 6.2 The company treats all customers equally under the same set of criteria and conditions to ensure fairness for all.
- 6.3 The company provides opportunities for new partners to collaborate, fostering the development of skills and new technologies. The partner selection process is fair, transparent, and verifiable.
- 6.4 The company provides accurate information and correct reports to partners.
- 6.5 The company prohibits the acceptance, receipt, or payment of any unethical business benefits with partners. To prevent unfair practices, the company prohibits the acceptance of any gifts or benefits from partners or any parties with a direct or indirect relationship to the business. However, gifts given due to customary practices, such as during the New Year, should be forwarded to the human resources department for collective use.
- 6.6 The company encourages its partners to cooperate in preventing and combating corruption and bribery, ensuring that no bribes in any form are given to government officials or employees of the company in order to facilitate improper conduct in any case.
- 6.7 Strictly adhere to the terms and conditions of the agreements. In cases where any condition cannot be met, promptly notify the partner to collaboratively consider and find a solution based on the business relationship.
- 6.8 Clearly define and ensure timely payment for goods and services in accordance with agreed payment terms.
- 6.9 Support and assist partners in conducting their business alongside the company's operations, ensuring fairness in trade and not exploiting business relationships.
- 6.10 Provide a channel for partners to file complaints if they are mistreated or unfairly treated, allowing them to report directly to the Chief Executive Officer (CEO) and the Chairman of the Audit Committee.
- 6.11 Implement measures to protect the confidentiality of partners' information. The company will ensure that no information or trade secrets of partners are used for personal or related parties' benefit inappropriately. The company will not disclose any partner information without prior authorization from the partner or the company's authorized representatives, unless the information must be disclosed to external parties for legal purposes or clarification.
- 6.12 Promote and support the development of the capabilities and potential of business partners, including collaboration to enhance product and service quality, the development of innovations for the benefit of

both the company and partners, and providing training seminars to improve knowledge and skills. This is aimed at ensuring that partners can operate their businesses sustainably alongside the company.

#### **7. Treatment of Business Competitors**

The company has a policy to treat competitors with a focus on conducting business freely, fairly, and transparently, adhering to the principles of good governance in competition according to legal standards, business customs, and best practices that align with international norms within the framework of competition law. Therefore, the following guidelines have been established:

- 7.1 Comply with generally accepted competition rules and practices.
- 7.2 In business negotiations, directors, executives, and employees must refrain from requesting, receiving, or offering any improper benefits in business dealings with partners.
- 7.3 Support and promote free, fair trade, without monopolizing or requiring partners to trade exclusively with the company.
- 7.4 Do not violate or seek confidential trade information from competitors through dishonest, illegal, or unethical means.
- 7.5 Do not damage the reputation of competitors by speaking ill of them, engaging in unfair competition, slandering, bullying, or distorting their facts.
- 7.6 Do not participate in any commercial contracts or actions that may lead to unfair competition or the creation of a market monopoly.

#### **8. Treatment of Communities, Society, and the Environment**

The company is always aware that it is part of society and has a responsibility to support and contribute to community activities in order to improve the quality of life and the economy of the community. The company believes that it will progress, develop, and grow sustainably, and survive in society, not only by offering quality products and maintaining integrity in its business practices but also by taking responsibility for improving the community. The company is committed to conducting activities that contribute to society, the community, and the environment regularly, to enhance the quality of life in the community, both through its own efforts and in collaboration with the government and the community. Therefore, the following guidelines have been established:

- 8.1 Commit to conducting business with consideration for the benefits and sustainability of the community and society, while prioritizing environmental responsibility.
- 8.2 Establish a policy for conducting business with consideration for the community, society, and the environment, ensuring that operations related to the company's business meet or exceed the legal requirements. The company must adhere to laws governing real estate development and comply with environmental standards to prevent and reduce adverse impacts on the community, society, and the environment.

- 8.3 Foster awareness and instill a sense of responsibility towards society and the environment by continuously communicating and educating employees at all levels of the company on corporate social responsibility (CSR) and environmental matters.
- 8.4 Survey and understand the relevant regulations and laws to prevent the company's business operations from negatively impacting the local community or society. This includes respecting the customs, traditions, and culture of each locality where the company operates.
- 8.5 Be adaptable to various changes and respond quickly and effectively to events that impact the environment, community, life, and property resulting from the company's operations. Fully cooperate with government officials and relevant agencies.
- 8.6 Regularly conduct activities to contribute to the community, society, and the environment, ensuring that the communities where the company operates or establishes itself experience an improved quality of life. The company will act independently and collaborate with government agencies, private sectors, and the community.
- 8.7 Operate under safety standards that comply with the legal requirements set by relevant laws and regulations.
- 8.8 Support and promote the efficient use of energy and resources, and improve human quality of life by managing environmental issues, recognizing that environmental protection is a shared responsibility of everyone.
- 8.9 Develop projects that can concretely benefit the community, including monitoring and measuring long-term progress.

#### **9. Confidentiality, Data Protection, and Use of Internal Information**

Confidential or internal information refers to important company data that has not been disclosed to the public. If such information were to be made public, it could have severe consequences for the company. Therefore, the company has a responsibility to safeguard and keep this information confidential, ensuring that it is only accessible to those who need it. All personnel within the company are required to adhere to the company's internal information usage policy. Therefore, the following guidelines have been established:

- 9.1 The company has established confidentiality levels for information, along with procedures to protect the confidentiality of important documents and information. These are safeguarded using specific methods defined for each level, type, or category of information.
- 9.2 Executives and employees must not disclose internal information they have learned through their duties to others. They must not use such information for personal gain or to benefit others in an improper manner, whether directly or indirectly, regardless of whether they receive compensation or not.
- 9.3 Disclosure of confidential or internal information must only be carried out by authorized personnel of the company. Individuals who are not responsible for disclosing information, when asked to provide



information they are not authorized to disclose, must refrain from doing so and advise the requester to seek information from the appropriate authorized person. This ensures that the information disclosed is accurate and consistent.

9.4 The company has a policy to keep confidential the information of executives, employees, partners, customers, and business information. However, the company is obligated by law to disclose such information when required, or when disclosure is necessary for legal proceedings, or when approved by the company's board of directors for disclosure.

9.5 When hiring individuals who have previously worked for competitors or government agencies, the company must investigate and review any confidentiality agreements that the individual had with the competitor or government. The company must not engage in any actions that would lead the individual to violate these agreements, which could result in legal actions or lawsuits.

## **10. Oversight and Internal Auditing**

The company oversees the establishment of an effective internal control system and implements appropriate risk management at suitable levels. An audit committee supervises the process, with internal auditors responsible for ensuring efficiency. Additionally, both executives and employees prioritize corporate governance and internal auditing to ensure the company complies with all relevant standards and laws. Therefore, the following guidelines have been established:

10.1 The company has established an internal governance and auditing system, ensuring a good control environment. This aims to foster a positive attitude towards internal controls among the company's employees.

10.2 The company will implement an appropriate risk assessment, which involves evaluating risks and overseeing the adherence to the company's governance principles. This aims to prevent potential impacts on the objectives, goals, effectiveness, efficiency, success of tasks, accuracy of financial reports, and compliance with laws, regulations, rules, or directives. The company will ensure that all duties are governed by effective control activities and maintain a robust monitoring and evaluation system to ensure the appropriateness of the system. This will include real implementation, achievement of outcomes, and annual improvements to ensure it adapts to changing circumstances.

10.3 The company must appoint an independent internal auditor who is directly accountable to the Audit Committee. The roles and responsibilities of the internal auditor should be clearly defined in writing. The internal auditor's duties are to conduct internal audits effectively, with the necessary expertise and competence, while adhering strictly to the ethical standards of the internal auditing profession.

10.4 The Audit Committee must review and ensure that the company has adequate internal control and internal audit systems. They are responsible for reporting the results of this review to the Board of Directors.

10.5 All executives and employees have the responsibility to cooperate and support the internal audit process. This includes providing necessary information and facilitating the internal audit to ensure its effectiveness.

#### **11. Intellectual Property Management**

The company has a clear policy to avoid any actions that would infringe upon intellectual property, including copyrights, patents, and trademarks. The company has established specific guidelines for its operations, such as in the case of copyrights. It has set policies for the use of the company's and its subsidiaries' information technology systems, with monitoring mechanisms in place to ensure that employees do not use software that violates copyrights or is unrelated to their work activities. The policy is as follows:

11.1 The company supports and encourages employees to utilize their knowledge and abilities in research and development to invent and create tools, equipment, and innovations that are modern and meet international standards. These inventions should be practical and usable while ensuring that intellectual property rights of others are not infringed upon.

11.2 The company provides training and knowledge about this policy to employees from the moment they join the company, ensuring they are aware of and understand the policy.

11.3 The company conducts audits on the use of software systems and hardware in tools/equipment used for work purposes to prevent the use of software and/or hardware that violates copyrights or is not related to the work.

11.4 The company provides training to employees to be cautious when using the internet to search for information or knowledge beneficial to their work and to avoid websites that are illegal, against traditions, or contrary to good moral standards.

11.5 The company encourages employees to strictly adhere to and comply with the intellectual property rights policy and copyright regulations set by the company.

#### **12. Respect for Human Rights**

The company recognizes the importance of respecting human rights and values the dignity and fundamental rights of individuals. It is committed to treating everyone equally and fairly, ensuring that interactions among employees are conducted with mutual respect and honor. Additionally, the company emphasizes labor rights by maintaining equality and fairness in all employment processes, including recruitment, compensation, performance evaluations, and more, without any form of discrimination. The company also actively promotes and supports human rights and will not engage in any actions that contradict these principles. It will not use forced labor in any form, nor will it engage in human trafficking or the use of child labor in violation of the law. The company has established channels for reporting whistleblowing or complaints for employees or stakeholders in cases of human rights violations. These reports can be made through the designated

whistleblowing and complaint channels. The company has implemented measures to protect whistleblowers or complainants in accordance with the policy on reporting violations and misconduct.

The company has established practices in accordance with the human rights policy as follows:

- 12.1 To respect human rights by treating each other with respect, honoring one another, and ensuring equal treatment for all stakeholders and vulnerable groups, without discrimination based on physical or mental differences, race, nationality, place of origin, ethnicity, religion, gender, language, age, skin color, education, social status, culture, customs, or any other factors.
- 12.2 Perform duties with caution to prevent the risk of human rights violations in business operations.
- 12.3 Treat each other without engaging in any form of harassment or abuse, including sexual harassment and other forms of harassment, whether through verbal actions, behavior, or inappropriate gestures.
- 12.4 Continuously develop and implement a human rights management process (Due Diligence Process), covering all stages of the business value chain, to identify issues, assess risks, and evaluate the impacts of human rights violations. Identify affected groups or individuals, including all stakeholders, plan and set guidelines for corrective and preventive actions, and manage the resolution and prevention of human rights violations in alignment with the organization's risk management framework. This should include risks within the industry and relevant countries, with ongoing monitoring and evaluation. Additionally, ensure the establishment of appropriate remedial processes to mitigate impacts in cases of human rights violations.
- 12.5 Communicate and disseminate the policy, provide education, raise awareness, set guidelines, and offer other support to employees, partners, and business counterparts within the business value chain (Suppliers/Contractors in Business Value Chain) to encourage their participation in conducting business ethically, respecting human rights, and treating everyone according to the principles outlined in this policy. Regularly review understanding and provide human rights training, including on discrimination and harassment in the workplace, for all employees and relevant stakeholders.
- 12.6 The company is committed to creating and maintaining an organizational culture that upholds respect for human rights in accordance with the human rights policy.
- 12.7 Monitor and ensure respect for human rights, not neglecting or ignoring actions that may constitute human rights violations related to the company. Such actions must be reported through the company's whistleblower channel and cooperate in fact-finding investigations. If there are any doubts or questions, consult with a supervisor or the secretariat at the email [comsec@rhombho.co.th](mailto:comsec@rhombho.co.th).
- 12.8 The company is committed to the human rights policy, including non-discrimination, opposition to harassment, and zero tolerance for any form of harassment (both sexual and non-sexual). Any complaints received by the company regarding violations of this policy will be considered

appropriately and fairly in accordance with the company's whistleblower policy. Such complaints will be kept confidential to ensure fairness and protect individuals who report human rights violations related to the company.

12.9 Individuals who violate human rights, engage in discriminatory behavior, or commit harassment are considered to have breached the human rights policy or the company's business ethics. The company will take corrective actions or consider disciplinary measures as outlined in the company's regulations. Additionally, legal action will be considered if the conduct violates the law.

12.10 The company is committed to communicating, reporting, and disclosing information on human rights operations, mitigation, and remediation efforts, including incidents of discrimination and harassment, to the public in a comprehensive and transparent manner.

### **13. Anti-Corruption and Anti-Bribery**

The company recognizes that bribery and corruption are serious threats that cause damage to economic and social development and hinder sustainable growth. Therefore, the company has established a policy to combat corruption, bribery, and unethical practices With the following details:

Directors, executives, and employees of the company are prohibited from accepting any form of corruption or bribery, whether from government agencies, private organizations, or individuals involved directly or indirectly, in order to secure business for the company or personal benefits that are unethical. This includes offering or receiving assurances of gifts, presents, entertainment, donations, fundraising, or any other benefits from individuals conducting business with the company.

The company has established the following guidelines to combat corruption and bribery:

13.1 The company has established a "No Gift Policy" during various festive seasons, such as the New Year or other occasions, to set a good standard for business operations. This policy is communicated to the directors, executives, employees, and business partners of the company.

13.2 The company ensures reliable financial reporting, an effective operational system, and the assessment of corruption and bribery risks in business processes, with regular monitoring and oversight to promote transparency in operations.

13.3 The company has established the dissemination, promotion, and development of knowledge and understanding for individuals within the organization, especially those who interact with stakeholders, to foster a strong awareness and create an organizational culture that does not tolerate corruption or bribery.

13.4 The company has established channels for complaints and whistleblowing regarding actions that may lead to corruption or bribery within the company. The company ensures protection and fairness for whistleblowers, including employees who refuse to participate in corruption or those who report

corruption related to the company. These channels are outlined in the company's policy for receiving complaints and whistleblowing on misconduct.

13.5 The company considers any action, involvement, or awareness of corruption or bribery as a violation of the company's business ethics. The individual responsible will be subject to disciplinary action as outlined by the company. If the action is also a violation of the law, the company will consider taking legal action in accordance with the relevant laws.

13.6 Guidelines for the conduct of directors, executives, and employees:

1. Directors, executives, and employees of the company must adhere to the "Anti-Corruption and Anti-Bribery Policy" and must not be involved in any form of corruption or bribery, either directly or indirectly.
2. Directors, executives, and employees of the company must not misuse their assigned authority to seek personal benefits or provide advantages to their family, associates, or close individuals, whether directly or indirectly. This includes improper actions within business processes, such as engaging in unethical practices to sell personal goods or services to the company or competing with the company, either directly or indirectly.
3. Executives and employees must not ignore or neglect any incidents of suspected corruption or bribery related to the company. They must report such incidents to their supervisor, responsible personnel, or through the Whistle Blower Channel. Executives and employees must also cooperate in fact-finding investigations.
4. Executives and employees of the company must not solicit or accept any improper benefits from stakeholders, as defined in the company's regulations on receiving or giving gifts and other benefits. They must exercise caution and avoid entertainment or hospitality from company stakeholders who may gain advantages from their duties or decisions.
5. Company employees are responsible for explaining and requesting cooperation from stakeholders in adhering to the "No Gift Policy", ensuring that stakeholders are informed periodically, such as during major festive seasons.
6. Executives and employees must cooperate in promoting good practices within the organization and support internal control and audit units in gathering information and monitoring actions related to corruption or bribery. Whistleblowers, informants, or complainants will be granted fair protection of their rights, and all provided information will be kept confidential by the company.

#### **14. Innovation Development**

The company places great importance on and supports the development of innovation to create value for the business, alongside creating benefits for customers, stakeholders, society, and the environment. Therefore, the company has established guidelines for promoting innovation development within the company as follows:

- 14.1 Organize activities that allow employees to participate in proposing ideas for creating innovations to enhance the value of the company's work or products, and to develop these ideas until they lead to innovations that can be practically implemented within the company.
- 14.2 Seek and acquire suitable innovations or technologies to be used in the internal management of the company's operations or applied to the company's real estate projects.
- 14.3 Enhance employees' knowledge and skills in innovation and new technologies for work and business operations within the company.
- 14.4 Collaborate with partners or stakeholders to source and create innovations for use in the company's work processes, products, or services.

## **15. Information and Information System Security**

The company prioritizes the security of its information technology systems to safeguard the data stored within these systems in accordance with international standards. This approach aims to reduce the risks of potential threats to IT systems, minimize damages from security breaches, and ensure the resilience of IT systems during emergencies or disasters that may impact the organization. The following operational guidelines are established:

- 15.1 The organization's critical information must be protected from unauthorized access.
- 15.2 Controls must be in place for external contractors involved in company projects to regulate their access to the company's information technology systems.
- 15.3 The organization's critical information must be kept confidential appropriately.
- 15.4 The organization's critical information must be accurate, complete, and reliable.
- 15.5 The organization's critical information must always be readily available for use.
- 15.6 Relevant laws, regulations, and rules must be fully and properly complied with.
- 15.7 Employees involved in data management must receive training on information security.
- 15.8 Implement management practices to ensure compliance with the Personal Data Protection Act (PDPA).
- 15.9 Establish risk management practices related to information security within the organization.
- 15.10 Establish a business continuity process in the event of emergencies or disasters, ensuring that operations continue without disruption. The process should maintain security levels comparable to normal operating conditions or at a level that the organization deems acceptable. Additionally, the plan must be properly maintained and tested regularly.
- 15.11 Establish a set of policies related to information technology security and supporting documents to define regulations, procedures, and guidelines for secure and safe data usage and operations.
- 15.12 Establish a process for reporting, investigating, addressing, and managing security breaches appropriately, including any irregularities and other suspicious incidents.

### **Code of Ethics for Directors, Executives, and Employees**

To align with the company's philosophy and business ethics, guidelines for directors, executives, and employees have been established for use in their work. These guidelines emphasize adherence to principles of morality, honesty, and integrity as follows:

#### **Self-Conduct**

1. Respect and strictly comply with laws, regulations, and the company's rules and policies.
2. Perform duties with care, honesty, diligence, fairness, and impartiality, free from bias, and refrain from using one's position for unethical personal gain.
3. Be conscientious of duties and take responsibility for the outcomes of one's work, ensuring that it is trustworthy and accepted by society.
4. Perform assigned tasks to the best of one's knowledge and abilities.
5. Exercise the right to express opinions in a polite and appropriate manner.
6. Use polite language and behavior, and refrain from any actions that show disrespect towards supervisors or colleagues.
7. Continuously develop oneself with moral values and ethics, as well as pursue further knowledge to enhance the effectiveness of performing duties.

#### **Conduct Towards the Company**

##### **1. Work Performance**

To ensure that directors, executives, and employees perform their duties in accordance with the code of business ethics, specific guidelines have been established as follows

- 1.1 Employees must perform assigned tasks with full competence, a sense of duty, and responsibility for the outcomes of their work.
- 1.2 Employees must not violate, avoid, or ignore the company's regulations, rules, announcements, or orders, including those that are legally binding and those given by supervisors within the scope of their authority.
- 1.3 Employees must not engage in any business or activities that could be perceived by the public as a conflict of interest with the company, whether directly or indirectly.
- 1.4 The company must store and segregate data details in strict accordance with the company's regulations and rules.
- 1.5 Employees must not disclose company information to unauthorized individuals, as per the company's regulations or business agreements, unless written approval is obtained from the authorized personnel and the responsible department.
- 1.6 Employees must not use company information for securities trading or disclose such information to others for securities trading purposes.

- 1.7 Employees must not produce or possess anything illegal, whether for personal use, sale, or for others.
- 1.8 Employees must use communication systems and computer systems responsibly, ensuring they do not cause division, harm others, damage morale, or promote hostility in the workplace.
- 1.9 Employees must not use communication systems or computer systems for illegal activities or in violation of company policies. They should also avoid using the internet or similar services in ways that could harm the company's reputation and credibility.
- 1.10 Employees must comply with the company's safety requirements, as well as properly use tools, equipment, and the work environment.
- 1.11 Employees must not intentionally create false or erroneous reports or records, nor deliberately conceal or present false or incorrect information to the company. If any incorrect or erroneous information is found in reports or records, it must be reported to the supervisor immediately.
- 1.12 Employees must use their work time efficiently and effectively, as specified in the regulations, and must not engage in or encourage colleagues or subordinates to use work time for activities unrelated to the interests of the company or its shareholders.
- 1.13 If employees witness any incidents of fraud, misconduct, corruption, or events that could cause harm to the organization, they must immediately report it through the company's designated complaint and suggestion channels.

## **2. Asset Protection**

Directors, executives, and employees are responsible for safeguarding and utilizing the company's assets to maximize their benefit to the organization. They must not use these assets, whether tangible or intellectual property, for personal gain or the benefit of others as follows

- 2.1 Employees must not use, sell, lend, or transfer company assets without proper authorization, regardless of the condition of the asset.
- 2.2 Employees must not intentionally damage, sabotage, or destroy the company's assets.
- 2.3 Employees must not use company assets for personal gain or external business activities unless authorized by their supervisor.
- 2.4 Employees must assist in obtaining patents, copyrights, or protecting trademarks that are intellectual property of the company to prevent leakage of such information. They must also refrain from using the company's intellectual property for personal gain or for others without proper authorization.
- 2.5 All employees must respect and honor the intellectual property of others. They must not use any part or whole of another party's intellectual property without obtaining permission from the rightful owner.



### **3. Protection of Interests**

#### **3.1 Safeguarding Customer and Company Information**

Directors, executives, and all employees must not disclose any customer or company information without the consent of the customer or the authorized person within the company, unless such disclosure is required by law. In such cases, prior authorization from the company's authorized personnel must be obtained.

#### **3.2 Conducting Business in Competition with the Company**

Directors, executives, and employees must not engage in, conduct, or participate in any business that competes with the company's operations.

#### **3.3 Trading the Company's Securities**

Directors, executives, and employees have the right to freely buy and sell the company's securities. However, directors and executives must prepare and submit a securities holding report to the Securities and Exchange Commission (SEC) within the specified time frame. Directors, executives, and employees must exercise caution when using the company's information for personal gain in securities trading. They are also prohibited from trading the company's securities during the one-month period prior to the public disclosure of financial statements and within 24 hours after such disclosure.

### **4. Conflict of Interest**

The company's board of directors has established a policy regarding conflicts of interest based on the principle that any decision made in the conduct of business activities must be for the sole benefit of the company. Actions that may lead to conflicts of interest should be avoided. Directors, executives, and employees are prohibited from using their position within the company to seek personal gain, either for themselves, their family, or close associates, whether financially or in any other way. They must avoid engaging in transactions related to their personal interests unless it is necessary for the benefit of the company and in accordance with the guidelines and regulations set by the Stock Exchange of Thailand as follows

#### **4.1 The receipt of money or compensation, or any financial involvement with business operators of the company**

4.1.1 Directors, executives, and all employees must not accept any personal money or compensation from customers, business partners, or any individuals due to their work on behalf of the company, or have any financial involvement such as joint ventures, trading with customers, contractors, suppliers of goods or services to the company, or from any other individuals doing business with the company.

4.1.2 Directors, executives, and all employees shall not borrow or solicit money from customers or business partners of the company, except for loans from banks or financial institutions in their capacity as customers of the bank or financial institution.

- 4.1.3 Directors, executives, and all employees should avoid transactions that involve themselves, unless necessary for the benefit of the company, and in accordance with the guidelines and regulations set by the Securities and Exchange Commission (SEC) and the Stock Exchange of Thailand. This includes disclosing information regarding names and relationships of related parties, pricing policies, and the value of transactions. Additionally, approval must be obtained from the company's board of directors for such transactions. They should also avoid transactions that involve financial assistance, such as lending money or guaranteeing loans for companies that are not subsidiaries of their own.
- 4.2 Engaging in other business activities outside the company or performing work outside of the company's duties**
- 4.2.1 Directors, executives, and employees must perform their duties with full commitment. In cases where directors, executives, and employees need to engage in work outside the company's responsibilities, they must obtain approval from their superiors in accordance with the chain of command, and such work must not affect their duties or the company's operations.
- 4.2.2 Directors, executives, and employees must ensure that any personal business activities do not affect their job performance or working hours at the company. They must not engage in any business with the company in their personal capacity, with their family, or through any entity in which they have an interest. Additionally, they must not engage in any activities that compete with the company's business. Any such activities must be disclosed according to the company's established guidelines.
- 4.2.3 Directors, executives, and employees are prohibited from engaging in or participating in any business that competes with the company's business, whether they receive direct or indirect benefits from such involvement.
- 4.3 Utilization of Company Information for Personal Gain and Trading of the Company's Securities**
- 4.3.1 Directors, executives, and employees must not use the company's confidential and material non-public information for personal gain or for the benefit of others, even if the company does not suffer any direct loss. This includes actions such as purchasing land or investing in businesses near areas where the company plans to invest, in a manner that suggests an intention to gain personal or third-party benefits.
- 4.3.2 Directors, executives, and employees responsible for departments handling internal information or having access to the company's confidential information must refrain from trading the company's securities during the period of one month before the disclosure of financial statements or any other internal information to the public, and within 24 hours after such disclosure. This is to prevent insider trading by these individuals.

4.3.3 In trading the company's securities, directors, executives, their spouses or cohabiting partners, minor children, and related persons as defined under the Securities and Exchange Act B.E. 2535 (1992) (as amended in B.E. 2559 (2016)) must prepare and disclose reports on their securities holdings, as well as report any changes in their securities holdings upon every purchase, sale, transfer, or receipt of transfer. These reports must be submitted to the Securities and Exchange Commission (SEC) within three days from the transaction date. Additionally, a summary of securities holdings must be presented to the company's board of directors in every meeting.

#### **4.4 Receiving or Giving Gifts and Business Entertainment**

4.4.1 Directors, executives, and employees must refrain from receiving or giving gifts in the form of money, assets, or any other benefits from any stakeholders involved in the company's business operations.

4.4.2 Directors, executives, and employees must not accept or offer assets, services, or entertainment that could influence or create undue motivation in decision-making, leading to unethical conduct. However, they may provide or accept business entertainment only if it serves the company's business interests and remains within the bounds of normal relationships with business partners or other related parties. Such entertainment must not be excessive, intended to gain an unfair advantage, or used to obtain improper favors or benefits.

4.4.3 Avoid and exercise caution when giving gifts to supervisors or receiving gifts from subordinates. Such giving and receiving must not create undue influence or unfair motivation in decision-making.

4.4.4 In cases where receiving gifts or other benefits is unavoidable or refusing them is not possible, the company allows only department manager-level executives and above to accept such items, with a maximum value of 3,000 Baht. The company has also established guidelines for giving and receiving items in its Anti-Corruption and Bribery Policy.

The Board of Directors has established a guideline for directors, executives, and related persons to disclose their own and related parties' interests to the Board by submitting the relevant information to the company secretary within 7 business days from the end of the year. This information will be reported to the Chairman of the Board and the Chairman of the Audit Committee within 7 business days. This disclosure should occur at least once annually. The purpose is to provide the company with information for compliance with regulations concerning related-party transactions that may lead to conflicts of interest and the potential transfer of benefits between the company and its subsidiaries. It also ensures that directors, executives, and related persons do not participate in decision-making processes related to transactions between the company and interested parties. In cases where there are changes to the information disclosed in the report, the Board requires directors and executives to submit an amended interest report to the company secretary within 3 business days from the change. The company secretary will then forward a copy of the amended report to the Chairman of the Board and the Chairman of the Audit Committee within 7 business days from receipt of the report.

## **5. Reputation Protection**

- 5.1 Fairness to Business Stakeholders Directors, executives, and employees must treat all business stakeholders—such as customers, partners, competitors, shareholders, and the general public—with fairness. This means acting without exploitation, ensuring fairness, honesty, and transparency in all interactions.
- 5.2 Compliance with Laws, Regulations, and Rules Directors, executives, and employees must conduct themselves within the framework of the law and regulations, refraining from any actions that would violate or breach legal requirements, which could damage both the company's and their own reputation.
- 5.3 Providing Information to the Public Any information about the company provided to the public must be based on accurate, correct, and complete data, and it should be communicated with caution and within a reasonable timeframe. The Chief Executive Officer (CEO) will review and directly assign executives or employees to provide information, news, or interviews to the public as deemed appropriate. Therefore, executives or employees who are not specifically authorized cannot provide information or conduct interviews with the public.

## **6. Political Activities**

The company has a policy of conducting business with political neutrality. It does not provide support, either directly or indirectly, through financial resources, assets, or company resources, to any politician, political party, or political group for their benefit.

However, the company encourages directors, executives, and employees to exercise their right to participate in political activities, in accordance with the Constitution, laws, and relevant regulations. It is important, though, that they avoid any activities that could create the perception that the company is involved in or supports any politician, political party, or political group.

### **Conduct Towards Shareholders**

The company is committed to being responsible and ensuring the highest level of satisfaction for its shareholders, with a focus on sustainable growth and continuous, reasonable returns. The company will also operate with transparency, maintaining reliable accounting systems. To align with these principles, the company strictly adheres to established practices and guidelines As follows:

1. Directors, executives, and employees must perform their duties with honesty, integrity, and fairness toward all shareholders for the overall maximum benefit.
2. Directors, executives, and employees must manage the company by applying their knowledge and management skills to the fullest in every case. All decisions and actions must be carried out with caution and thorough consideration."
3. Directors, executives, and employees must not engage in any actions that could create a conflict of interest with the company.

4. The company must report its status and future prospects to shareholders in an equal, consistent, and complete manner, in accordance with the truth.

#### **Conduct Towards Customers and the Public**

The company is committed to ensuring customer and public satisfaction and confidence by providing high-quality products and services at reasonable prices. Additionally, the company strives to maintain sustainable, positive relationships with customers and the public As follows:

1. Committed to creating customer satisfaction and confidence by providing high-quality products and services that are safe for customers' health, at a reasonable price. Continuously and seriously elevating standards to ensure ongoing improvement.
2. Executives and employees must disclose information and details about products and services in a complete, accurate, timely, and truthful manner, without distortion of facts, while maintaining sustainable positive relationships.
3. The company must provide product and service warranties under appropriate time conditions.
4. The company must establish a system that allows customers and the public to file complaints regarding products and services, and take the best possible actions to ensure prompt responses to customers and the public.
5. The company must not charge excessive profits when compared to the quality of products or services of the same type or category, and must not impose unfair trading conditions on customers."
6. Executives and employees must strictly adhere to the conditions set for customers and the public. If compliance is not possible, they must promptly inform customers and the public in advance to jointly consider and find a solution
7. Directors, executives, and employees must maintain the confidentiality of customer information in accordance with the Personal Data Protection Act and other relevant laws, and must not use such information for their own or related parties' benefit.

#### **Complaint Handling and Reporting of Misconduct**

The company has a policy for receiving complaints and reports of misconduct, violations of rights, or cases of corruption, in order to provide a channel for directors, executives, employees, and stakeholders to report any wrongdoing or actions that are not in compliance with the law, company regulations, company ethics, or violations of their rights. This policy ensures that all concerns are addressed promptly and appropriately you can file a complaint through the following methods:

1. Send a sealed letter directly to the recipient of the complaint, which is the Chairman of the Audit Committee or the Chief Executive Officer.

**Dear** Chairman of the Audit Committee or Chief Executive Officer

Rhombho Property Company Limited (Public)

444-444/1 Pracha Uthit Road, Huai Khwang District

Huai Khwang District, Bangkok 10310

2. Notify via E-Mail Address: CG@rhombho.co.th or you can send an email directly to the complaint recipient as follows:

Chairman of the Audit Committee: [ronnachitma@gmail.com](mailto:ronnachitma@gmail.com)

The complainant should provide clear and sufficient details or evidence that demonstrates there is reasonable cause to believe that there has been a violation of laws, regulations, company rules, or business ethics of the company. The complaint will be treated as highly confidential, with access to the information restricted to only those who are directly involved, in order to protect the whistleblower from potential repercussions. Complaints can be made through more than one channel.

After the company receives the complaint or tip-off about misconduct, it will investigate the information and facts as appropriate to the nature of the complaint. In cases that are severe or complex, a fact-finding committee will be established to reach a conclusion and resolve the issue.

#### **Whistleblower Protection Measures**

The company has established the following whistleblower protection measures:

- The company will keep the information and identities of the complainant, whistleblower, and the person being reported confidential.
- The company will disclose information only to the extent necessary, taking into account the safety and potential harm to the whistleblower, the source of the information, or any involved individuals.
- Individuals who have suffered harm will be provided with appropriate and fair compensation or remedial actions through a proper process.
- In cases where the complainant, whistleblower, or individuals who cooperate in the fact-finding process feel that they may face safety risks or potential harm, they can request the company to implement appropriate protective measures. The company may also proactively implement protective measures without a request if it deems there is a potential for harm or safety concerns.
- The company will not take any unfair actions against the complainant, whistleblower, or individuals who cooperate in the fact-finding process, including changing their job position, job duties, workplace, suspending them, intimidating, disturbing their work, terminating their employment, or any other actions that may be considered unfair treatment.
- If it is found that anyone has harassed or treated a whistleblower or complainant unfairly, the company will take decisive disciplinary action against the individual responsible.

#### **Suggestions when in doubt or problems**

This code of ethics serves as a basic guideline that must be followed by all directors, executives, and employees. It may not cover every situation in practice. If any executive or employee has doubts or issues regarding implementation, they should consult with their immediate superior. In cases of conflict, the final decision will be made by the Chairman of the Executive Board.

#### **Monitoring and ensuring compliance with the policy**

The company mandates that it is the duty and responsibility of all directors, executives, and employees to acknowledge, understand, and strictly comply with the policies outlined in this Code of Business Conduct. Compliance is not voluntary, and no one may claim ignorance of the established guidelines. Executives at all levels must take responsibility and prioritize ensuring that employees under their supervision fully understand and adhere to the Code of Business Conduct and workplace guidelines with diligence. The company does not condone any actions that violate the law or ethical principles. Any director, executive, or employee who breaches the prescribed ethical standards will be subject to strict disciplinary action and may also face legal consequences if their actions are unlawful.

#### **Policy Review**

The company mandates an annual review of the Code of Business Conduct to ensure its continued relevance, effectiveness, and compliance with legal and ethical standards.

#### **Disciplinary Actions**

The company considers the Code of Business Conduct outlined in this document as a disciplinary requirement that all directors, executives, and employees must strictly adhere to. Any violation or non-compliance is regarded as a breach of discipline under the company's personnel management regulations. All directors, executives, and employees have a duty to comply with and promote adherence to the Code of Business Conduct. The following actions are considered disciplinary offenses:

1. Failure to Comply with the Code of Business Conduct
2. Encouraging or Supporting Non-Compliance with the Code of Business Conduct
3. Neglecting or Ignoring Violations of the Code of Business Conduct
4. Failure to Cooperate or Obstructing Investigations
5. Unfair Treatment of Whistleblowers