

5.2 Code of Conduct

Adhering to the principles of sustainable business operations under the “Sufficiency Economy” philosophy, the Company has adopted the **“Somboon Triple Bottom Line”** approach to promote business sustainability while protecting interests of stakeholders and society.

The approach opens an opportunity for stakeholders to express their opinions regarding business operations, serving as a mechanism and process to ensure proper business practices, leading to an organization with good corporate governance.

The Company has created the Good Corporate Governance Policy, Business Ethics and Code of Conduct to use as best practices in conducting business based on the fundamental principles of Good Corporate Governance, transparency, and accountability. Employees shall adhere to these practices and guidelines for appropriate operations. Additionally, communication is facilitated to ensure that employees have knowledge and understanding of these policies, allowing them to utilize effectively in their work. This creates sustained value for stakeholders through various processes as follows.

1) Knowledge sharing and test regarding business ethics, good governance and sustainability of organization.

To create a shared understanding of guidelines on the Company’s policies regarding ethics, good governance and sustainability among executives and employees, the Company has provided the Business Ethics Manual and Code of Conduct. Communication and knowledge are disseminated to employees through many channels such as

- New employee and executive orientation sessions,
- Self-directed learning for executives
- Annual employee training using online platforms, emails, and company activities.

Furthermore, the Company has required annual business ethics tests for executives and employees to assess the level of knowledge and understanding of organizational ethics through online and other channels. This is conducted to ensure that executives and employees are adequately aware of the ethics regularly. The operation results are listed below.

- Orientation for new employees and executives totaling 22 individuals; all employees achieved a good level of knowledge and understanding of organizational ethics.

For this year, the company has enhanced its corporate governance and business ethics training curriculum by requiring all employees at every level within the Somboon Group to attend and pass an online course. This is to strengthen the knowledge and understanding of employees throughout the organization. (Further details can be found in the Good Corporate Governance section)

The Company has provided reviews of the Business Ethics Manual regularly to be updated with new law, current risks and circumstances, and to be in accordance with the project of Thai Private Sector Collective Action Against Corruption (CAC) principles. Moreover, the Company has complied with relevant standards, for example, the principles of Organization for Economic Co-operation and Development (OECD), and the Corporate Governance Code (CG Code), 1992 for listed companies according to the Securities and Exchange Act, the Securities and Exchange



Link : Business Ethics
Manual (satpcl.co.th)

2)) Complaint handling and whistleblowing

The Company offers opportunities to employees and stakeholders of all groups to have complaint channels, expressing opinions and whistleblowing for illegal conduct through following channels.



Website: link : Complaint Channel |
Somboon Advance Technology (SAT)
(satpcl.co.th)



E-mail

Send directly to independent directors or the
Company Secretary or Compliance Department
02-080-8271 nopamas.p@somboon.co.th



Telephone

Directly contact the Company Secretary or
Compliance Department



Letter

Deliver directly to the Company Secretary at The
Company Secretary, Tower 2, Somboon Advance
Technology Plc., No. 215, Moo 2, Debaratna
Road, Bang Chalong Subdistrict, Bang Phli
District, Samut Prakan 10540

The company has a screening and consideration process for all received complaints. The Internal Audit Department will conduct a preliminary verification. If a complaint is found to be substantiated, the Internal Audit Department will propose that the President appoint an Investigation Committee to conduct a fact-finding inquiry. The Investigation Committee will then recommend disciplinary action in accordance with the company's work regulations for approval by the authorized person or committee.

The Internal Audit Department will report the results to the Executive Committee for their consideration and for directing management to take further action as required.

3) Monitoring Code of Conduct practices

The company is committed to upholding the highest standards of business ethics. Accordingly, it is mandatory for department heads or assigned representatives to report any breach of the Code of Conduct to the Compliance and Audit Department immediately upon becoming aware of an incident. Any violation of the Code of Conduct constitutes a disciplinary offense.

The matter will be subjected to the company's formal investigation process, and disciplinary measures will be imposed on the offender commensurate with the severity of the violation. Furthermore, corrective and preventive measures will be determined on a case-by-case basis to prevent future occurrences.

Furthermore, the company continuously implements preventive measures to prevent violations of its corporate code of ethics throughout the organization, as follows

- (1) Notifying all employees about their responsibility to adhere to the organizational ethics.
- (2) Establishing penalties in cases of non-compliance with organizational ethics.
- (3) Arranging orientation for new employees and executives.
- (4) Communicating and training employees and executives annually through online channels and company activities.
- (5) Creating and communicating channels for submitting complaints and whistleblowing, outlining the Company's investigation process by an ad hoc committee, and all complaints are to be reported through these designated channels. In the event of a complaint, the

Investigation Committee will determine disciplinary action based on the severity of the issue. The committee will also establish corrective and preventive measures to prevent a recurrence of the matter. Furthermore, the committee will monitor the implementation of these corrective and preventive measures until it is confident that the issue has been resolved and that appropriate and sufficient preventive guidelines have been established.

- (6) Reporting operational performance results in accordance with Good Corporate Governance principles regularly to the Audit and Corporate Governance Committee for acknowledgment during scheduled meetings.
- (7) Revising the procurement manual to ensure that the procurement management system is effective, transparent, and auditable.

In 2023, the Company did not find any issues or errors that were important matters to anti-competition, discredit, monopoly, discrimination events, corruption events, and business ethics violations.

In 2024, the company received one complaint through its designated channels concerning a case of internal fraud. The Investigative Committee conducted a factual inquiry and gathered evidence, which substantiated the allegation. However, the misconduct did not have a significant impact on the company's operational performance or its internal control system.

The Investigative Committee resolved to penalize the employee with termination without severance pay, effective immediately. Following this case, the company analyzed the root cause of the issue to establish corrective actions and enhance the preventive measures within the internal control system for greater rigor. The implementation of these measures is being continuously monitored to mitigate the risk of recurrence.

The corrective and preventive measures have been fully implemented, and there are currently no other outstanding complaints under investigation or remediation.

