

## Code of Conduct

### Message from Chairman

Board of Directors has realize importance issue on building ethic value to make as corporate culture so code of conduct on business ethic has been prepared (written) for Directors, Executives and employees for understand and realize on company's standard of ethic as uses for business operation and desire every employees within organization use as framework for their practices. Moreover, to promote behaviors that demonstrates responsibility for work, shareholders, workmate, stakeholders and society includes avoid any behaviors which conflict to business ethic and may contradict the law.

Board of Directors had confidence and adherence to ethic including justice and morality as a key to business operation and work practice so make company grown steadily and popular among customer and always appreciated by those who are involved.

On behalf of Board of Directors, hopefully all of us will adhere by practices this particular policy strictly.

Mr. Wutichai Leenabanchong  
Chairman

## **1. Introduction**

To perform the task of Directors, Executives and employees along with law and ethic to operate the business so code of conduct has been prepared for everyone to use as guideline or framework of practices. Code of conduct has been prepared which concerned as importance evidence of sustainable business essentially guideline principle of employee action throughout organization and way company has operates by creating value for employees to adopt a corporate culture. By this, it is the mechanism that helps to achieve goals set by the company and strengthens reputation of the organization.

This code of conduct is preliminary practice that everyone should follow and made in situation of changes in business therefore cannot accommodate all future changes – everyone should study and understand the true way and maintain this code of conduct.

## **2. Objective**

2.1 To ensure that stakeholder are guided by company's mission with honestly, fair and equitable as treatment of company, stakeholders for all public and social.

2.2 To the company will not use this method to abolish law or ethical as just to complete the operation

2.3 To be consistent with company's anti-corruption policy

## **3. Scope**

This code of conduct make for apply to Directors, Executives and all employees (collectively called “employees”) of company

The company expects agents and other business intermediaries as related or acting complete the operation

## **4. Principle on Business**

In order to maximize benefits to shareholders, Board of Directors has a policy to give equal on importance together with simultaneously between achievement of goals and method uses for success.

Board of Directors has set goals and methods to achieve goals as stated in vision, mission, and principle of good corporate governance policy as well as set requirement defined in “Code of Conduct” for clarity and convenient for Directors, Executives and employees of company for acknowledgement on standard of practice that company expects and take as guideline for operation from dealing with employees, shareholders, customers, partners, competitors and society as a whole.

#### **4.1 Vision and Mission**

##### **Vision**

It is the company that invests in other companies with potential and growth potentially by focusing on using technology, expertise and management to improve the business efficiency and create returns to shareholders in variety of ways in long term.

##### **Mission**

1. Focusing on investment in other companies with excellence and highest returns
2. Operate the business by seize on corporate governance with fair trading and anti-corruption
3. Responsible of shareholders in term of value added to business continually and return to shareholders and stakeholders

#### **4.2 Responsibility to Shareholders**

The company recognizes and respect right of shareholders equitably and continually and return to shareholders and stakeholders for good return on investment for good return on investment to shareholders continuously and sustainable. The company has set the guideline for shareholders as follows:

- (1) Board of Directors, Executives and every employees as perform their duty honestly
- (2) Acknowledge to shareholders on status of organization regularly
- (3) Treat all shareholders equitably and not commit any acts that violate and/or deprive shareholders’ rights

### **4.3 Compliance with applicable laws and regulations**

The company is committed to respecting and adhering to the law which relevant regulation and all regulations in all area of business by set the policy as follows:

- (1) Directors, Executives and employees should practices in accordance to law, regulations and respect for local custom where company operates
- (2) Directors, Executives and employees should practices in accordance with regulation from Stock Exchange of Security Exchange Commission
- (3) Directors, Executives and employees should practice in accordance to company's regulations
- (4) Directors, Executives and employees must not act, assist, support or cooperate to promote the avoidance of compliance with any law or regulation
- (5) Directors, Executives and employees must cooperate with regulatory agencies and report information on the breach or failure to comply with laws or regulations to those agencies

## **5. Conflict of interest and keeping confidential information**

### **5.1 Conflict of interest**

The company has a policy of conducting business with honestly, rational and independent thus everyone in organization decides on any action for public benefit also not use chance from Directors, Executives and employees and/or use of information and properties to seek personal benefits, take into family benefit or dissenting or close. Guidelines for Directors, Executives and employees to eliminate potential conflict of interest

- (1) Avoid making transaction which related to yourself which may cause conflict of interest
- (2) In case where such items are necessary for benefit of company then make that transaction virtual third party, By this, Directors or Employees who considered as stakeholder in those transaction must have no part in the approval
- (3) In case connected transaction happened the company must comply with the regulation of company and regulation of Stock Exchange of Thailand and disclose such information sufficiently complete

- (4) Do not use opportunities or information from being Directors or Employees for personal gains in term of doing the business that completes with company or doing business which related
- (5) Do not use inside information for personal benefit for purchasing company's shares or provide inside information to another person for benefit of company's shares

## **5.2 Use internal information of company and maintain customer information Privacy**

The company has a policy to keep information confidential and secure in order to prevent information leakage to outsiders. This includes maintain customer information confidential and secure in order to prevent information leakage to outsiders. This includes maintain customer information privacy by the company has set the following guidelines.

- (1) Must not disclose personally identifiable information from third parties unless such information is publicly made public
- (2) Must keep customer information privacy and not violate privacy or take any benefit from those information
- (3) Avoid using information for sake of buying or selling company's shares or providing information to other person for purpose of buying or selling company's shares or providing information to other person for purpose of buying or selling company's shares, should ignore on purchasing or selling of company's shares before public financial statement or public status of company includes importance information

## **6. Responsibility to company and company's assets**

### **6.1 Protection of company's properties**

The company encourages its executives and employees to use resources and assets of company in order to increase competitiveness and provide better services to its customers by practice guidelines of executives and employees as follow:

- (1) To use properties and resources of company economically and most beneficial
- (2) Must help to take care any property of company

## **6.2 Documentation**

- (1) Must prepare the document with good faith, carefully and in accordance to standard set
- (2) Do not copy company's reports or documents is forbidden

## **6.3 Use of company's computer and information technology**

- (1) Computer, Information Technology and information uses in workplace considered as property of company thus executives and employees should not use company and information technology for personal gains
- (2) Executives and employees must not disclose information as in the System without any permission
- (3) Executives and employees must not change, repeat, delete or destroy company's information without any permission
- (4) Executives and employees must not bring illegal software to use and no copyright for any reason without any permission from manufacturer of the software
- (5) Executives and employees should not customize hardware devices or install any device beyond equipment installed by company without any permission
- (6) Executives and employees should not use company's email to forward any mischievous, rude, and pornographic, intimidate, aggravate or message that disturbing other person
- (7) Executives and employees should use internet to seek information and knowledge which useful to work and avoid illegal website or violate morality
- (8) Executives and employees should use communication equipment as provided by company such as Telephone, Facsimile, Mobile Phone conscious and responsible and take into account the benefit of company

## **6.4 Anti - Corruption and Corruption**

The company jointly all anti-corruption and corruption programs – there are no policies, incentive, premiums, special benefits in any form either directly or indirectly or through third parties, company partners, external agencies or government officials to obtain or retain business advantage or disadvantage. There is no policy to pay prize or any payment to

accelerate the operation or facilitate except for conventional business entertainment, trade discounts and corporate promotional programs

### **6.5 Intellectual Property**

Company intellectual property such as copyrights, trademark, trade secrets as important to maintain a competitive advantage therefore Directors, Executives and employees has responsible to maintain and protect intellectual property and use those right responsibly

Apart from this, Directors, Executives and employees should respect legitimate right in the intellectual property of others

### **6.6 Human Rights**

Company has supports and respects human right and will operate in accordance with the principles and intentions of Universal Declaration of Human Rights under the authority of company and will not involve any action contrary to human right principles.

## **7. Code of Conduct for Stakeholders**

### **7.1 Code of conduct for shareholders**

The company has realize that shareholders are considered as owner and company has responsible to build more value added to shareholders in long term therefore company has set following guideline for Directors, Executives and employees.

- (1) Perform duties honestly and decide on any action carefully and fair among major shareholders and minority shareholders for the best benefit of shareholders as a whole
- (2) To present company's status, performance, financial position, accounting and other reports on regular basis
- (3) To inform all shareholders equally about future prospects of organization both positive and negative as based on possibility which has supported and reasonable information available
- (4) Do not exploit yourself and other for any information that is not publicly available or take any action in a manner that may cause conflict of interest with organization

## **7.2 Code of conduct for employees**

The company has a policy to treat its employees with fairness due to company has realize that employees considered as importance and valuable asset for company. Moreover, as an importance factor in enhancing company's image to its customers, partners, shareholders and other stakeholders. The company has a policy to promote for strong corporate culture by increasing value of work and increasing knowledge, ability and continuous development of employees to comply with such policy – The company adheres to following principles.

- (1) Treat employees with courtesy and respect for individuality and dignity of Humanity
- (2) Provide fair compensation to employees
- (3) To maintain a safe working environment for the life and property of employees
- (4) Appointment and relocation which includes rewards and punishment for employees as act in good faith and based on knowledge, ability and suitability of employees
- (5) Pay importance roles on development of knowledge and ability of employees by giving opportunity thoroughly
- (6) Listen to comments and suggestions based on professional knowledge of employees
- (7) To practice in accordance to law and any regulations which strictly base on related with employees
- (8) Avoid any action that may affect job security of employees or threatening and putting pressure mental state of employees
- (9) Employees may complain in case there is unfair treatment in accordance to system and processes defined

## **7.3 Customer responsibilities**

The company has recognizes importance of satisfaction to the success of business therefore we have intention to seek ways to satisfy our customers' needs more efficiently and effectively as define the following policies and practices

- (1) Deliver quality products and services as meet or exceed customer expectation with the fair prices



- (2) Provide accurate, adequate and up to date information to customers for knowledge of products and services without exaggeration – customer is misled about quality, quantity or conditions of products or services
- (3) Practices in accordance with conditions to customer strictly if any conditions cannot be met then customers must be informed in order for the company to find the solutions
- (4) Communicate with clients politely, effectively and its customers' trust
- (5) Provide system and processes that customers can complain about quality, quantity, safety of goods and services which includes speed for responding or deliver to customers
- (6) Maintain confidentiality of customers and not use them for their own benefit or those who are wrong
- (7) To provide advice on how to use company's products and services effectively for beneficial maximum to customers

#### **7.4 Code of conduct for trading partners and/or creditors**

The company has policy to treat its partners and/or creditors in fair and equitable manner by taking into account with the maximum benefit of company and based on fair return to both parties, avoiding situation that lead to conflict of interest including practice according to agreement, provide fact information, correct report, negotiating and solving problems which based on business relationship by the following guidelines.

- (1) Do not use the opportunity to be an executive of an employee responsible for purchasing, provide services for their own benefit
- (2) No call or receive or pay any interest which is unfair in trade with partners
- (3) Fulfill conditions and commitment with partner strictly, no forcing on buying and selling the products or pay services to unfair with trade partners

#### **7.5 Adherence to competitors**

The company has a policy to support and promote competitive of fair trading

The company has no policy to compete in any way to obtain information of competitor illegally and unethical as following guideline apply

- (1) To operate under rules of good competition

- (2) Do not seek confidential information from your competitors in a dishonest or inappropriate manner
- (3) No destroy reputation of competitor by making false allegation

#### **7.6 Occupational safety, Health and contribute**

The company has a policy to run on business which based on safety, health and environmental as following guideline apply

- (1) The company will comply with all applicable laws and regulations such in term of safety, occupational health and environment of community as go into action
- (2) The company will maintain a safe working environment for employee's life and properties
- (3) Executives and employees must take seriously any activities that will enhance the quality occupational health and environmental
- (4) The company will disclose information honestly related to relationship amount company's operation to occupational safety and environment.

#### **7.7 Code of conduct on corporate social responsibility**

The company intends to develop and improve on producing quality products according to standard on environmental friendly as focusing on raw materials (appropriate quality which reasonable for standard of product). By this, the company has realize the safety of employees, customers, partners and community as affected by the organization by comply with legal requirement and other requirement in accordance with international practice. The company is also focusing on creating corporate attitudes and culture for employees' to have responsibility toward social.

#### **8. Caring on Code of conduct**

The company has assigns duties and responsibilities to Directors, Executives and employees which should aware and practices in accordance to this Code of conduct strictly, every level of management within the organization must responsible and considered as importance factors to acknowledge employees under their supervisory line to understand and follow Code of Business Ethics seriously.

The company is not desirous to commit any illegal act contrary to good ethic if any Directors, Executives and employees commit wrongdoing or deliberately misleading employees or not inform to company when seeing other doing the wrong things then they will be punished strictly and if it is illegal of rules, regulations of government the company will send those matter to government official to proceed.

## **9. Compliance with Corporate Governance Compliance and Code of Conduct**

Board of Directors has assigned Chief Executive Officer and/or Managing Director and/or Corporate Secretary to consider complaints and report on corporate governance clues and Code of Conduct and other business ethics that may cause suspicion of corruption either directly or indirectly through channels as follows:

1. Email
  - 1.1 Managing Director: [suthin@rwi.co.th](mailto:suthin@rwi.co.th)
  - 1.2 Corporate Secretary: [pipit@rwi.co.th](mailto:pipit@rwi.co.th)
2. Post To
  - 2.1 Mr. Suthin Phadetpai “Director and Managing Director”
  - 2.2 Mr. Pipit Jaovisidha “Corporate Secretary”  
Rayong Wire Industries Public Company Limited  
900/14 SVOA Tower, 18th Floor, Rama 3 Road, Kwang Bangpongpan,  
Khet Yannawa, Bangkok 10120

This will be effective from November 8, 2017 onward

Mr. Wutichai Leenabanchong

Chairman

Rayong Wire Industries Public Company Limited