

True Corporation Public Company Limited

Code of Conduct

Why we have a Code of Conduct

As a company with strong values, our conduct is not only about performance, goals and achievement. It is also about how we behave towards each other and be a trusted partner to our customers, shareholders, colleagues, and to our business partners and the communities in which we operate. The company is committed to providing the highest standard of products and services to its customer and shall be honest and forthright in everyday interactions with customers. The company is also committed to maximizing shareholder value by creating investment returns in a sustainable manner in which all shareholders are treated equitably.

Our business depends on this trust and we are committed to conducting our business in a responsible, ethical and lawful manner. The Code of Conduct (the Code) is the foundation of our corporate culture and sets our high standards of integrity on how we do business. Everyone in the Company must follow these standards. We make decisions every day that may influence our reputation. An uninformed decision, even made with best intentions, can damage our reputation.

The Code Principles set out the core requirements for our conduct in the Company. The Code Sections include specific requirements and guidance for critical risk areas. The Code of Conduct helps us all make informed decisions and explains where to go for more information and guidance.

Who must follow the Code

The Code of Conduct applies to all employees and everyone acting on behalf of the Company, including the Board of Directors. We also expect business partners to commit and uphold the same high ethical standards (Refer to Supplier Code of Conduct).

How to use the Code

The Code of Conduct and specific requirements contained in the Code sections form our basic obligations. Everyone has the duty to follow this Code of Conduct, to support compliance with this Code of Conduct, and not to neglect or ignore non-compliance. Additional requirements in our Policies and Procedures must also be understood and followed.

The Code set clear requirements for our day-to-day operations and guides us when we are confronted with challenges and ethical dilemmas. You may always contact your line manager or the Ethics & Compliance function when you have questions or concerns. You may also seek advice or ask a question using the Integrity Hotline and may even remain anonymous if necessary.

The Code cannot cover every dilemma or situation we will face in our day-to-day work. There will continue to be business challenges and uncertain legal and regulatory developments. In such cases, we are not relieved from the obligation to uphold the highest ethical standard, but we should seek guidance to help us make the right decision. Beyond setting out our own ethical standards, the Code Principles require us to comply with applicable laws and regulations. You should always familiarise yourself with the law and seek guidance from Legal function if you have questions.

What is expected from us as employees

As an employee of the Company, you are expected to:

- Always act with high integrity
- Read, understand and follow the Code, Policies and Procedures
- Raise issues of concern as described under the section "How to Speak Up"
- Attend training sessions on the Code in a timely manner
- Know when and how to seek further guidance
- Cooperate fully and transparently in all investigations
- Avoid any practices that may be unlawful, unethical or harm Company's reputation
- Assess the risks you may encounter and seek appropriate training and guidance to effectively manage them.

What is expected from our leaders

Leaders of the Company are not only expected to follow the requirements above, but also expected to:

- Live the "Tone from the Top" and communicate regularly on the importance of compliance
- Identify and anticipate business compliance risk areas that affect your team's operations
- Proactively identify actions that will mitigate compliance risks
- Ensure that the teams are sufficiently trained and prepared to deal with relevant dilemmas and provide guidance where necessary
- Foster an environment of open reporting to ensure that all team members are comfortable raising concerns without fear of retaliation
- Act as role model for our behaviours as demonstrated in decision-making and other processes
- Promote diversity and inclusion in the workplace
- User high standards of integrity as a criterion in recruitment and promotion processes
- Avoid strategies, targets or timelines that could create pressure on employees or business partners to engage in unethical business practices.

Code Sections

1. Anti-Corruption

We have zero tolerance for corruption

The Company has created and maintained an organisation culture which adheres to the principle that all types of corruption are forbidden and unacceptable. Therefore, everyone is prohibited from participating in any form of corruption, either directly or indirectly, whether it is for the benefit for themselves, or of their family members, friends or acquaintances. Also, it is everyone's duty to strictly abide by the anti-corruption measures without offering or accepting bribes in all kinds of business operations. The Company's operations and contact with the government sector must be transparent, honest and in accordance with applicable laws.

What we need to know

- The Company does not tolerate bribery or improper payments or advantages of any kind.
- We are committed to conducting our business in an open and transparent manner.
- Bribery is illegal and exposes those involved and the Company to reputational and legal risks.
- Bribery may take many forms including facilitation payments, kick-back schemes and the use of shell companies or hidden owners.
- Public Officials are often subject to strict anti-corruption rules and should be treated with extra caution.
- Corruption in our supply chain may create significant risk for the Company even if we are not directly involved.
- Gifts and hospitality may be considered bribery or providing an improper advantage in certain situations.
- Even charitable donations or sponsorships can be seen as bribes if undertaken to secure a commercial advantage.

What is expected of all of us

- We never engage in bribery or trading in influence.
- We never offer, give, ask or accept an improper payment or advantage.
- We never make facilitation payment unless we believe that our life or health is in danger.
- We always report any request from any third party for a bribe or facilitation payment.
- We never request someone else to engage in conduct that we are not allowed to engage in ourselves.
- We carefully select our business partners and monitor their commitment to ethical and lawful conduct.
- We maintain our books and records to reflect our business accurately and fairly.
- We exercise appropriate caution when interacting with Public Officials.
- We always speak up to our manager, the Ethics & Compliance Function, or through the Integrity Hotline when we have concerns regarding corrupt conduct of our colleagues or business partners.

What we look out for

- If we become aware of unusual or inflated payment terms that appear to have no clear business purpose.
- If we suspect that a business partner is not complying with Company's standards for business conduct.
- If we become aware of a business partner is interacting with Public Officials on our behalf.
- If requests are made to donate to charities or sponsor organisation that may be affiliated with a public official.
- If we are offered or requested to provide gifts, travel, donations or lavish entertainment or to make cash payments for any reason.

2. Business Partners

We expect our business partners to meet our standards and respect our ethical values when working for or with us

What we need to know

- The actions of our business partners can damage our reputation and expose us legally.
- Business partners include individuals and entities, with whom the Company engages or plans to engage such as suppliers, agents, distributors, franchisees, joint venture partners, sponsorship and donation recipients, sustainability partners and other relevant parties.

What is expected of all of us

- We only work with business partners that demonstrate satisfactory standards of responsible business conduct and ethical values.
- We expect our business partners to abide by all applicable laws, to meet the Company's Business Partner Code of Conduct for responsible business conduct and to protect us from risks while working for or with us.
- We exercise caution when selecting business partners and we follow the Company's procedure including risk assessments.
- We monitor and support our business partners to conduct their activities in accordance with the Company's standards for responsible business conduct.
- We carefully evaluate business opportunities to ensure that they are following applicable trade controls including sanctions regimes and import-export requirements.
- We treat all business partners with respect and in a fair and transparent manner.

What we look out for

- If we encounter a business partner not fully committed to following our standards including the Company's Business Partner Code of Conduct where applicable.
- If we seek to engage a business partner who will operate as a lobbyist, agent or other party which will act on behalf of the Company.
- If we become aware of a business partner conducts business in a way that could reflect negatively on the Company.
- If any business partner has not been properly assessed and managed according to the Company's requirement.
- If we become aware of other behaviour or circumstances that make us question the conduct or ethics of a business partner.

3. Climate and Environment

We are committed to protecting the environment and contributing to the prevention of climate change

The Company pays attention to activities which have an impact on the environment and considers the health and safety of its employees and of the communities surrounding the areas where the Company operates. Thus, while working each day, employees must always comply with the Company's standards for environmental protection.

What we need to know

- We comply with local laws and internationally recognised environmental standards.
- We are committed to minimising our use of resources including energy, water and raw materials.
- We must comply with the Company's policies regarding the management of hazardous objects or waste.

What is expected of all of us

- We seek to make reasonable efforts to minimise greenhouse gas emissions from our operations.
- We consider climate and environment impact when purchasing products and services and evaluate our suppliers on responsible business criteria.
- We support sustainable waste management including making reasonable efforts to minimise our waste.
- We participate in Company's projects concerning environmental protection and conservation such as recycling projects.
- We are transparent and report on how our activities impact the climate and environment.
- We report incidents we see that are harming the climate and environment.

What we look out for

- If we become aware of the Company's operations and suppliers that fail to meet our climate and environmental standards.
- If we become aware of that applicable environmental regulations or company guidelines are being breached.

4. Competition

We compete fairly

Strictly abiding by the law, the Company offers quality products and services and tries to maintain the trust of customers, vendors and business competitors by conducting business with fairness and complying with business ethics. The Company's entire business must be in accordance with related laws and regulations. It is the duty of every employee to be aware of the Company's standards, related laws and future laws which will affect their work.

What we need to know

- Fair competition is important to society and creates long lasting business opportunities for the Company in all countries where the Company is present.
- Creating or benefiting from an unfair advantage will harm our reputation with our customers, business partners and the public.
- Anti-competition agreements or practices are not only against our standards, but they are also against the law.

What is expected of all of us

- We make our own pricing and business strategy, and compete on the merits of our offerings.
- We limit communications with actual or potential competitors and do not share commercially sensitive information.
- We do not, formally or informally, enter into agreements or practices with actual or potential competitors to share markets, fix prices or limit input or sales.
- We obtain approval according to our internal requirements before joining a Trade Association or Industry Forum.
- We remove ourselves immediately from the discussion and report the conversation to our Legal function and/or Integrity Hotline should a conversation with an actual or potential competitor turn to an inappropriate, anti-competitive subject.
- Employees must encourage selling of Company's products and services by comparing them to those of the Company's competitors fairly and truthfully without distorting facts. Furthermore, employees should not make false claims about the competitors as well as about their product and services.
- We must not engage in any espionage and sabotage or bribe both current future business competitors.

- We must not seek the competitors' commercial or secrets or proprietary information by unlawful methods such as stealing, espionage or violation of an agreement not to disclose competitors' information, whether such information derives from customers or other people.
- We have an obligation to promptly report suspected violation of competition laws to the Legal function.

What we look out for

- If we are approached by actual or potential competitors, customers or business partners with information about their pricing, strategies, business tactics or similar topics.
- If we suspect formal or informal agreements exist, or otherwise are to be entered into, that limit our actual or potential competitors' access to customers or related markets.
- If we plan to attend informal or social meetings with actual or potential competitors.
- If we plan to interact with actual or potential competitors where there are indications that the objective is to exchange competitive sensitive information.
- If we plan to establish pricing strategies or other market strategies that could be viewed as abuse of dominant position.

5. Confidentiality and Information Handling

We treat information as a valuable asset and act accordingly

Proprietary information is important for commercial strategies. Thus, employees should realise that most of the information which has been developed by the Company or is owned by the Company is a secret which must not be disclosed without permission. The utilisation and the storage of such information with extreme care significantly contribute to competitive advantages.

What we need to know

- As employees of the Company, we sometimes come across confidential information regarding the Company, the customers or business partners.
- Most information is digital and can be easily accessed, modified, shared and replicated.
- Records are information with high corporate value. They are important to the Company and must be identified and protected.
- There may be external requirements as to how long you can or must retain different types of information.
- Confidentiality is critical for the Company's reputation, for protecting the Company's interest in competitive and regulatory processes and for securing the integrity of our assets.

What is expected of all of us

- We only share confidential information when we are formally authorised to do so and there is a legitimate reason for doing so.
- We protect confidential information from unauthorised access.
- We promote a knowledge-sharing culture but take precautions when processing confidential information.
- We treat information from third parties with the same level of confidentiality and care as our own information.
- We do not discuss sensitive topics in public places.
- We ensure that all information from the Company is reliable and correct and complies with high professional and ethical standards.
- We must not alter the Company's records without prior approval.
- We must keep the Company's records according to the laws, according to Company's policies and according to business needs.
- We must keep personal and proprietary information related to the Company's employees, customers, vendors and investors protected and confidential unless the information is revealed to persons who have obtained permissions to use it for related purposes only.
- We use the Company's approved systems and perform information processing activities in line with any issued requirements.
- When employees are about to share proprietary information with third parties, they must have written approval from their supervisor and the Company's Legal Function. Furthermore, the third party must agree not to disclose such information to anyone else.
- Employees must obtain permission from an authorised manager and Legal Function before making any non-disclosure agreement or disclosure agreement.

What to look out for

- If we overheard an employee speaking about non-public information in public.
- If a business partner requests us to sign a confidentiality or non-disclosure agreement.
- If we are handling information or company records which are sensitive and should be protected.
- If someone attempts to engage us in discussions that lead into details of the Company's business.
- If you are sharing confidential information with any external parties.

6. Conflict of Interest

We always act in the Company's best interest

The Company encourages everyone to participate in activities and do things that will contribute to their personal interests beyond their work responsibilities. However, at the same time, everyone should always remember that such actions must not affect their work responsibility or their reaching a decision which is accurate, unbiased and in line with the Company's business objectives. Any conflict of interest may cause problems for the Company's work and everyone's own work. The things that will make the Company's business and its employees outstanding is providing maximum benefits for customers, shareholders and the Company, as well as avoiding improper use of authority.

What we need to know

- A conflict of interest exists when our personal interest conflicts or could be perceived to be conflict with the Company's interests.
- Personal interests include our financial interests, business opportunities, outside employment or the interests of people close to us, such as close family members, personal friends or business associates.
- Even the perception that we may not be acting in the Company's best interest can call into question our integrity and adversely affect our reputation.
- All decisions that are made on behalf of the Company must be based on an objective and fair assessment of the Company's interest without being impacted by our personal interest.
- Openness and transparency are essential to manage actual, potential or perceived conflict of interest.
- A conflict of interest can still exist even if the Company benefits in some way.

What is expected of all of us

- We avoid conflict of interest and other situations which could impact our judgement.
- We recuse ourselves from situations and decisions where we have a potential or perceived conflict of interest.
- We promptly disclose actual, potential and perceived conflict of interest to our manager.
- We work with our manager to resolve conflict of interest and document our decision and actions.
- We always involve the Ethics & Compliance function if a conflict of interest cannot be avoided.
- We do not hold external duties or positions that could affect or be perceived to affect our responsibility to act in the Company's best interests.
- We obtain written approval from our manager before accepting external directorships or other material assignments, and we keep records in accordance with Company's procedures.

- We must not accept money or any reward from the Company's customers or vendors or any other person for work performed in the name of the Company.
- Persons who are a director or executives of the Company (as defined by the regulations of Securities and Exchange Commission), whose spouse or lawful dependent child buys, sells, or invests in the Company's securities, must report all such transactions to the Company Secretary immediately when made.
- We must not offer or accept offers of personal loans, guarantees, discounts or privileges from the Company's Vendors and competitors.

What to look out for

- If we have a financial or other interest in an existing or potential business partner of the Company.
- If we hold outside employment or positions that could interfere with our ability to perform our duties for the Company.
- If we are recruiting, hiring or directly supervising a family member, friend or individual with whom we have a close personal relationship.
- If we are offered anything of value in our personal capacity from existing or potential business partners including gifts, discounts or other benefits.
- If a business partner of the Company is providing or will provide services to us in our private capacity.

7. Financial Integrity and Fraud

We maintain accurate financial records and comply with all disclosure standards.

The data recorded by employee indicate the results of operations and create advantages in business. Complete, accurate and precise data will contribute to smooth operation, save costs and help define business strategies. These data also allow shareholders to see the employees' commitment in working with prudence and integrity. Furthermore, many laws have determined severe penalties for data misuse, inaccurate date recordation and avoidance to record some important information in the Company's records.

What we need to know

- Financial integrity is key to maintaining the trust of our shareholders, customers, business partners and employees.
- Meeting international Financial Reporting Standards is not only required, but it also enables us to best manage our business.

What is expected of us

- We follow Accounting Principles and abide by internal controls implemented by the Company.
- We register all transaction correctly in accordance with legal obligations and good accounting practices.

- We report accurately, reliably, transparently, consistently and in timely manner.
- We ensure that expenses are reasonable and recorded properly when we spend the Company's money.
- We make decisions in accordance with applicable Authority Matrix and ensure segregation of duties where applicable.
- We verify facts and completeness of information and underlying business rationale before approving a transaction or signing a document.
- We do not create fraudulent records, falsify documents or otherwise misrepresent facts, transaction or transaction data.

What to look out for

- If we see financial or accounting irregularities.
- If we become aware of that a colleague or business partner has falsified any documentation.
- If we are unsure if we have recorded a transaction correctly.
- If we become concerned that any employee is misreporting financial information, including sales results or forecasts.
- If we become concerned that the Company's resources are not being spent or recorded as consistent with our policies.

8. Gifts, Hospitality and Travel

We avoid business courtesies that may be perceived as impacting business decisions.

The Company is committed to conducting business with honesty and integrity under the provisions of applicable laws and criteria to maintain the Company's reputation. The Company considers that, the exchange of goodwill in business on some occasions may be an expression of mutual trust and gratitude. Nevertheless, the Company does not support the improper acceptance and offering of gifts, assets or other benefits which may affect business decisions, create perception of conflict of interest or bribery and adversely impacting Company's reputation.

What we need to know

- Business courtesies such as gifts, hospitality and travel may create a conflict of interest or be considered bribery in certain circumstances.
- Gifts are something given without the expectation of anything in return, including goodwill.
- Hospitality takes many forms, including meals and beverages, seminars, receptions, social events and entertainment.
- Travel includes the costs of transportation including taxis, trains, buses, flights, accommodation and hotels and other incidental travel costs.
- Business partners, including Public Officials may need to comply with strict rules on what they may give or receive.

What is expected of us

- We never offer or accept business courtesies which could or could be perceived to improperly influence a business decision.
- We never offer or accept cash, cash equivalent or expensive and extravagant gifts.
- We do not offer or accept gifts except for promotional items, or minimal value normally bearing a company logo, and only when it would be customary to do so.
- Should an employee receive a gift that is not in compliance with these rules, it shall be returned or be turned over to the Ethics & Compliance function as soon as possible.
- We may offer or accept hospitality when the business purpose is clear and legitimate, the costs are reasonable and the context is open and transparent, but we prefer to cover our own costs.
- We always pay our own costs for travel, accommodation and related expenses. Likewise, we do not pay for travel, accommodation and related expenses for others.
- We do not allow business courtesies to be extended to family or close friends.
- We always discuss offerings or accepting business courtesies with our immediate supervisor.

What to look out for

- If business courtesies are offered during sensitive situations such as ongoing negotiations or procurement processes.
- If asked to sponsor, donate or contribute to faith-based organisation, political, government, military, police and/or other public institutions and entities.
- If we become aware of business courtesies that are not offered or accepted in an open and transparent manner.
- If we believe that offering or accepting of business courtesies could lead to others to question our independence, objectivity or integrity.
- If we become aware of repeated offers to or from the same business partner or a related one.

9. Health, Safety and People Security (HS&S)

We provide a safe and secure workplace for all employees and our suppliers.

The health and safety of employees, customers and vendors are very important to us. Employees should consider the effects of daily work on the Company's operation and not place themselves and other people in risky situations unreasonably. Besides, employees should feel safe while at work or working. Therefore, employees should pay attention to workplace safety as well.

What we need to know

- We all have a responsibility to provide a healthy, safe and secure workplace for our employees, suppliers and visitors.
- We recognise a shared commitment and responsibility to ensure the health, safety and well-being in our operations and throughout our value chain.
- We comply with international and local HS&S legislation and guidelines and aim to perform to the highest standards within this area.
- We promote as one of our core values a proactive work culture of engagement and commitment towards the health, safety and well-being of employees and everyone who works for us.
- We promote a culture of proactive HS&S incident reporting from employees and suppliers.

What is expected of all of us

- We are conscious of our work environment, act responsibly and are accountable for own actions.
- We proactively foster a safety culture and collaborate with our suppliers in identifying and mitigating health, safety and security risks.
- We make ourselves aware of potential risks in our workplace and continuously work to minimize any hazards to the health, safety and well-being of our employees and business partners.
- We ensure that incidents, near-misses, unsafe acts and conditions are reported regardless of their severity, for lessons learnt and continuous improvement.
- We immediately stop and report unsafe work.

What to look out for

- If we see any unsafe acts and conditions that might put ourselves, our colleagues or suppliers at risks.
- If we have any concerns for health, safety and well-being of any employee.
- If our policies and requirements are not followed or do not comply with HS&S legislation, there are any signs of unsafe situations, elevated stress, inappropriate behaviour or poor well-being of employees and/or business partners.

10. Human Rights and Labour Rights

We respect and support human rights and labour rights.

What we need to know

- We are equally entitled to human rights and labour rights without discrimination as set out in international fundamental principles, conventions and local laws.
- We have the responsibility to respect human rights. Respect for human rights is integral to the Company's business and how we operate. Labour Rights are a vital part of human rights.
- We are committed to contributing towards a positive human rights impact on society.

What is expected of all of us

- We take necessary measures in order not to violate, nor are we complicit in violations by others, of the human rights and labour rights of our colleagues, the employees of our business partners, our customer and anyone impacted by our operations.
- We will report on any actual or potential violation of human rights or labour rights to our manager or through other existing mechanisms, such as the Integrity hotline.
- We will contribute to positive human rights impacts, including children's rights and digital inclusion.

What to look out for

- If we experience, become aware of, or suspect any violations of human rights of our colleagues, employees of business partners or of any people where we operate.
- If we, or one of our colleagues, are prevented from joining legitimate employee engagement forums e.g. labour unions.
- If anyone, including Public Officials, asks for personal data on the Company's employees, customers, or business partners without the right authorisation and without following due process.
- If a contract we are negotiating has such a low price or short delivery period that it will likely lead to low wages or excessive working hours for business partner employees.
- If an existing or potential business partner refuses to commit to the Business Partner Code of Conduct or is not willing to collaborate in relation to inspections, audits or other transparency efforts.

11. Insider Trading

We do not share or act on inside information.

The rule of the Securities and Exchange Commission and the regulation of Stock Exchange of Thailand specify that the use of inside information for security trading or the forwarding of inside information to other parties for such purpose is against the law.

What we need to know

- Inside information is any non-public information that would impact the stock price of a company if it was known to the public, such as financial results not yet disclosed publicly, potential mergers and acquisitions, senior management changes and significant legal matter.
- Trading on inside information violates our ethical standards and is a personal criminal violation under any jurisdiction's laws and may lead to severe consequences for you personally and for the Company.
- Sharing inside information with others who then trade on that information is considered tipping and is a violation of both our governing documents and the law.

What is expected of all of us

- When in possession of inside information about the Company or any other company, we do not trade, engage in tipping or suggest that others should trade in any securities.
- We treat all inside information that is not generally available to the investing public as proprietary and confidential.

What to look out for

- If we become aware of a business or legal issues that may have positive or negative consequences for the price of the Company's stock or that of a customer or business partner.
- If someone suggests that we buy or sell a security based on material non-public information.
- If we are notified that we are on an insider list.
- If we are part of a merger acquisition or key strategic project.
- If your business unit is publicly-listed (stock exchange).

12. Money Laundering

The Company opposes to all forms of money laundering.

To conduct business, the Company will use funds from lawful sources and will comply with the laws that are related to anti-money laundering. The Company will not receive money transfers of alter conditions of assets or encourage the receiving of money transfers or alteration of conditions of assets which are related to wrongdoings, so as to prevent any person from using the Company's business to transfer, conceal or disguise the sources of assets or making use of the Company's financial transactions for money laundering purposes.

What we need to know

- Money laundering is the process of hiding or disguising the proceeds of a crime.
- The proceeds of a crime can be anything of value including money, goods, assets and real estates.
- Money laundering may take many forms and can occur in all kinds of deals and transactions, including banking, investments, invoicing and property.
- Trusts and shell companies may disguise the true owners of money and increase the risk of money laundering.
- Money laundering also includes the use of legitimate funds to support criminal activity or terrorism.

What is expected of all of us

- The Company seeks to engage business partners involved in legitimate business activities with funds derived from lawful sources.
- We avoid money laundering by screening and monitoring our business partners in accordance with the Company's procedures.
- Before making a transaction with a third party, we must be aware of the source of the money.
- When making a payment, we must pay the contracted party or person who is specified in the contract as the receiver of the money. Payment must not be made through a person or channel from an unclear source unless such action complies with related laws.
- We question unusual payments or banking arrangements and report unusual requests.
- We always consult the Legal and/or Tax function(s) if we are in doubt about the origin or destination of money and property.
- We promptly report suspicious transactions or incidents of money laundering to line supervisor and the Legal function.
- We are attentive to potential under or over-valuing of invoices or assets.

What to look out for

- If payments are performed by or through someone who is not a party to the contract.
- If payments are requested or performed in a different manner than what is agreed to in the contract.
- If payments are received in cash and are not customarily paid in this way.
- If payments come from offshore bank accounts.
- If payments come from unusual accounts not typically used by the party in question.

13. Privacy

We earn trust by protecting all personal data.

As customers entrust their information, records and contacts with the Company, it is the Company's responsibility to meet customers' expectations that the privacy of their information will be strictly maintained. Thus, the Company must develop specific standards for the protection of data and communications with customers to earn their trust.

What we need to know

- We hold personal data on all our customers and employees, and we have an obligation to protect it and only use it for legitimate business purposes.
- Personal data includes employees, customers and business partners information such as content of communications, phone numbers, emails, addresses, locations, call and payment history, salaries and health information.
- All personal data is to be considered confidential.
- Responsible use of personal data is instrumental in maintaining our customers' and employees' trust.

What is expected of all of us

- We do not share personal data with anyone who does not have a specific business purpose for it, unless sharing the data has been authorised or is legally required.
- We only access personal data for specific business purpose.
- We are open and honest with our customers and employees about how we use their data.
- We ensure that personal data is processed with proper access controls, security and data protection measures in place.
- We stay informed of our responsibilities related to privacy when we work with projects or initiatives that involve personal data processing.
- We follow established privacy procedures and processes.

What to look out for

- If there is unauthorised access to personal data, including sharing of data with third parties without appropriate privacy safeguards in place.
- If we are collecting data about our employees or customers, which they would not reasonably expect us to collect or use in this way.
- If the personal data of our employees or customers is being used in a way that may be considered intrusive.
- If a government official requests information about an employee or a customer, including business records without following proper procedures.
- If there are any indications that personal data has been or may be compromised.

14. Public Officials

We follow high ethical standards when interacting with Public Officials.

Contacting government officials, whether the government agency is a customer or an authority, is important for the Company's continual success. Therefore, employees should avoid any misconduct or actions that exert influence on government agencies, officials and employees to obtain undeserved benefits. Disregard of the Code of Conduct may cause government officials, companies and employees to be punished by the law. Also, employee should create good governmental relationship based on honest, respect and trust for one another as well as the Company's ethical standards.

What we need to know

- Public Officials include all individuals employed by or acting on behalf of a government, including anyone holding a legislative, administrative, executive or military office.
- Public Officials execute governance functions that are vital to the societies in which we operate and are also vital to our license to operate there.
- The Company interacts with Public Officials at various levels and for many different purposes.
- Information shared with Public Officials may become public due to laws regulating public access to government held information.
- Individuals employed to stated-owned companies may be considered as Public Officials.

What is expected of all of us

- We do not engage in conduct which could or could be perceived to improperly influence a public official.
- We exercise appropriate caution toward Public Officials when the Company is engaging in a commercial or approval process.
- We are always compliant with local laws or rules that apply to Public Officials.
- We do not offer gifts to public officials except promotional items of minimal value and only when it is customary to do so.

- We do not pay travel, accommodation or related expenses for Public Officials.
- We offer only modest hospitality to Public Officials and only when there are clear and legitimate business purposes, the costs are reasonable, and the context is open and transparent.
- We always discuss offering business courtesies to Public Officials with our manager and seek guidance from the Ethics & Compliance function as needed.
- We do not make facilitation payment to Public Officials, and we report requests for such payment to the Ethics & Compliance function.
- We only use lobbyists to advocate on our behalf in special circumstances with full transparency and with prior approval by the CEO.
- We ensure the third party towards whom any lobbying activity is being conducted is aware of our relationship with the lobbyist. In the event a lobbyist is used, it shall be promptly disclosed to the third party the lobbyist represents the Company. The obligation shall be included in the agreement with the lobbyist.
- We do not engage in external discussions with Public Officials on behalf of the Company unless we have been previously authorised to do so.

What to look out for

- If a business partner directly or indirectly interacts with Public Officials on our behalf.
- If a Public Official asks for the personal data of our employees, customers or other individuals.
- If a Public Official requests the Company to send information or messages to our subscribers.
- If a Public Official owns, manages or is affiliated with a business partner.
- If a Public Official, or a close family member or business associate of the Public Official applies for a position within the Company.

15. Safeguarding our Assets

Security is embedded in everything we do.

The company is trusted by its shareholders to manage the Company's assets using appropriate methods such as procurement, possession and distribution since it has an effect on the assessment of the Company's financial success. Thus, employees must make use of the Company's assets appropriately, efficiently and also maintain them properly.

Thoughts, concepts and other information that employees come up with are also considered valuable assets to the Company. These assets are the heart of new product development, and they stimulate the generation of new business opportunities. If employees do not identify and protect these intellectual properties, the Company may lose its privileges and business advantages.

What we need to know

- Company assets are everything that our company owns or uses to conduct business including equipment, facilities, systems and information.
- Protecting company assets is core responsibility for all of us.
- Intellectual property such as trademarks, copyrighted works, inventions, trade secrets and know-how, are often valuable and may be important to the Company's success in the market.
- Security threats can affect our assets and have significant financial, operational and reputational impact.

What is expected of all of us

- We always assess the security risks and follow security policies and requirements when we make business decisions.
- We report any security incidents immediately and in accordance with local procedures, laws and regulations.
- We protect company assets from loss, damage, theft, waste and improper use.
- We limit employee and third-party access to company assets to what is necessary to accomplish assigned work.
- We always follow proper protocols for granting access and do not share our access credentials, including PIN codes, tokens and passwords.
- We only use the Company's approved systems for information sharing and storage.
- We protect our premise from unauthorised access, and we wear our Company badge visible when in the office.
- We protect the Company's intellectual property as appropriate and respect the intellectual property rights of others.

What to look out for

- If we observe people on our premise or trying to enter our premise without authorisation or properly displayed credentials.
- If our cell phone, laptop or computer is lost, stolen or suddenly behaves differently.
- If we receive emails, messages or calls that are suspicious.
- If we detect vulnerabilities in our systems, processes or facilities.

16. Workplace Environment

We treat each other with respect and dignity.

Employees should realise that the safe, ethical and respectful work environment starts from the fact that everyone is responsible for their own action and conducts business in an honest and moral manner by strictly following Company's policies and Code of Conduct. Non-compliance may result in disciplinary actions.

What we need to know

- All employees deserve a workplace environment, independent of work location, that is free from harassment, intimidation, discrimination or threats of violence for any reason, including actions based on gender, sexual orientation or identity, race, ethnicity, disability, national origin, religious or cultural beliefs or citizenship.
- We view employee diversity as competitive advantage, as it broadens our perspectives and allows us to better understand our customers' needs.
- The Company does its utmost to actively promote equality in all employment practices.
- We foster a working environment where people are treated honestly and professionally and are valued for their unique ideas and differences.

What is expected of all of us

- We show respect for our co-workers and treat them as we ourselves would like to be treated.
- We do not retaliate against any employee, business partners or customers for raising a good faith concern.
- We do not engage in conversations or send communications of any kind that contain offensive name-calling, jokes, slurs, stereotyping, blackmailing or threats, nor do we display or share offensive pictures, cartoons, drawings or gestures.
- We actively listen to different points of view and consider those perspectives exclusively on their own merit.
- We do not use alcohol or illegal drugs in the workplace, or abuse prescription medication, and we never purchase sexual services on business trips or other assignments.
- We must not possess, sell, use, product or distribute any illegal drugs or controlled substance.

What to look out for

- If we experience, witness or hear of any form of bullying, mocking or harassment of any kind.
- If we experience or become aware of incidents of harassment, sexual harassment or discrimination of any kind, involving anyone.
- If our managers and supervisors are repeatedly identifying one colleague or a specific group of colleagues for criticism or special treatment based on characteristics unrelated to their work.
- If we suspect that certain colleagues are not receiving fair consideration for promotion of project assignments.
- If we are concerned that certain individuals or group of colleagues are excluded from participating in activities or discussions.
- If we encounter or witness any violent behaviour or any behaviour which may be harmful to other people's health or life.

17. News and social media

We always act responsibly in our external communications.

What we need to know

- Employees are encouraged to share non-confidential news, milestones and achievements related to the Company on their social media accounts.
- However, only mandated individuals are allowed to speak on behalf of the Company, including on social media or other digital platforms.
- The Company does not take political positions or associate with political movements, though we may participate in public debates on topics important to our strategy and business performance.
- The Company does not support political parties, neither in the form of direct financial support, in-kind donations nor paid time.

What is expected of all of us

- We do not engage in external discussion, including on social media, on behalf of the Company unless we have been previously authorised to do so.
- We do not discuss sensitive or confidential information from our work in public or social media.
- We reflect only our personal views in social media. However, as an employee of the Company, we are mindful that social media posts can spread rapidly and are difficult to retract, and therefore exercise caution before we post.
- We refer external questions about the Company from journalists/media to the Communications function and appropriate spokespersons.
- We are mindful that the Company operates with diverse values and legal frameworks, which means that local communications can have significant impact to our society.
- We may participate in political activity provided it is lawful, conducted in our own time, with our own resources, and not linked to our employment with the Company.

What to look out for

- If we become aware of public discussions on social media or other media platforms with a potential reputational risk to the Company.
- When planning to speak at external events or other forums where we represent the Company.
- If we are concerned that our communications with outside sources could reflect negatively on the Company.
- If we promote our company and receive backlash from an external audience on social media or other media platforms.

How to Speak Up

One of the Code Principles is that we “speak up”. We ask our managers and the Ethics & Compliance function when we have questions about whether activities are ethical or compliant with our Code, and we always challenge and report activities that we believe may breach our Code or applicable law. Through reporting we enable the Company to keep its promise to operate legally and ethically and we help the Company to protect its good reputation. It is a responsibility that we share as the Company’s employee.

It sometimes takes courage to come forward and share your concerns. If you are not comfortable discussing or reporting an issue to your manager or the Ethics & Compliance function, you may use the Integrity Hotline which is available to all employees, business partners and stakeholders. The Integrity Hotline is designed to protect the privacy of individuals who report a concern, and individuals who are subject of a reported concern, through a reporting channel that is operated by an independent company. All reports are treated as confidential, and a very restricted number of people are allowed access to them. The channel is always open and is available in most local languages. You may choose to remain anonymous. Your identity is kept confidential unless you agree otherwise.

All reported concerns are taken seriously and given fair and objective follow-up. The reports are first received and reviewed by the Company’s Investigation function. In cases that present serious allegations or concerns, the Investigation function will undertake an independent investigation to clarify relevant facts. Other cases are transferred to and managed by an appointed independent function in the Company. All functions are required to maintain information in the strictest confidence to ensure the integrity of the process.

An important part of our compliance programme is taking effective corrective action and, where appropriate employee discipline. In all cases, the Ethics & Compliance function supports management in resolving the investigated concerns to determine whether disciplinary or corrective actions are required. Anyone who violates the law, the Code or the Company’s Policy or Procedures may be subject to disciplinary action, up to and including termination of employment. Such violations may damage the Company’s reputation and result in commercial loss, and violations of the law may expose the Company, and even the individual violator, to fines, penalties, damages and in some cases, imprisonment.

It is important to remember that we can all report suspected unethical or illegal behaviour without fear of retaliation. The Company does not tolerate retaliation of any kind against those who speak up in good faith.