



BUSINESS CODE OF CONDUCT POLICY

EUROASIA TOTAL LOGISTICS PUBLIC COMPANY LIMITED

ISSUE 4

EFFECTIVE DATE 12 SEPTEMBER 2023



Preparation and Approval History

Document No.	Editor/Controller	Reviewer	Approver
CP-BOD-003-02	Managing Director	Chief Executive Officer	Board of Directors
	1 September 2023	1 September 2023	11 September 2023

Revision History

Issue	Issue Date	Effective Date	Revision details
1	10 October 2021	9 November 2021	First issue
2	10 June 2022	6 August 2022	Revise company name after conversion to public limited company
3	3 January 2023	12 January 2023	Amend the material of being a holding company
4	1 September 2023	12 September 2023	Amend email address of the Chairman of the Audit Committee

Note: To add or cancel any document, proceed according to the acts set out in the Approval and Implementation Authority.



Business Code of Conduct Policy

Euroasia Total Logistics Public Company Limited (“the Company”) and its subsidiaries focus on doing business on the grounds of ethics and morality with responsibility to all stakeholders. The company has prepared this business code of conduct by complying with the principles of good governance and disseminating the business code of conduct to directors, executives, and employees of the company and its subsidiaries to be aware of the practices of the company and its subsidiaries specified in this business code of conduct for their operations to achieve business goals, along with the organizational culture. The company also expects directors, executives, employees, and all relevant stakeholders to be informed and strictly adhere to and follow the business code of conduct to maintain the moral standards in business operations and choose to do what is appropriate without any exceptions.

1. Definition

Company	means	Euroasia Total Logistics Public Company Limited
Directors	means	the company’s directors or subsidiaries
Executives	means	Executives of the company or subsidiaries
Employees	means	Employees of the company or subsidiaries
Stakeholders	means	people who are related to the company or its subsidiaries in various areas consisting of shareholders, business partners, customers, competitors, creditors, employees, communities, and society

2. Responsibilities to Stakeholders

2.1. Policy and Guidelines on Shareholders

- (1) The company is determined to operate its business with good performance to enhance competitiveness and create added value for shareholders in the long run.
- (2) The company will treat shareholders equally and will not do anything that is a violation or deprivation of the rights of shareholders.
- (3) The company encourages shareholders to attend the shareholders’ meetings to participate in decision-making on important matters and to acknowledge operations and activities of the



company and its subsidiaries as well as being able to monitor the performance of the Board of Directors and the management team.

- (4) The company will disclose information with transparency and reliability to shareholders through the company's website and investor relations.
- (5) The company will provide the conflict of interest prevention policy and the policy on the use of internal information to prevent the use of internal information for the personal benefit of the Board of Directors and the management team to maintain the shareholders' interests.

2.2. Customer Policy and Guidelines

- (1) The company will run business and provide services in accordance with relevant laws and standards by determining to create satisfaction and confidence for customers with an emphasis on care and listening to customers' opinions.
- (2) The company will treat customers with equality and fairness on the grounds of obtaining fair returns for both parties.
- (3) The company will disclose complete, accurate, and sufficient information about the services to customers in order to provide them with sufficient information for decision-making without exaggerating claims in advertising, public relations, and promotions to mislead customers about the quality, conditions, or price of goods and services or take advantage of customers' misunderstanding.
- (4) The company will continuously and consistently improve the quality of its services to meet the needs of customers by conducting surveys on customer satisfaction to the company's services and using the results to improve the services and to help promote good relationships with customers.
- (5) The company maintains customer confidentiality and does not use it wrongfully for the benefit of oneself and those involved.



- (6) The company will develop personnel coming to provide services to customers by training employees before working, developing their skills, knowledge, ability to work continuously and consistently in order to provide the company's customers with the best service.

2.3. Policy and Practices towards Trading Partners

- (1) The company will provide a procurement process, so that the procurement is transparent, verifiable, and generates the ultimate benefit to the company.
- (2) In selecting the company's business partners, the company considers trading partners who respect human rights and treat their workers fairly, including social and environmental responsibility.
- (3) The company will treat its business partners fairly and equally on the basis of fair competition and mutual respect.
- (4) The company will strictly comply with the terms of the contract or agreement with partners. In the event that one of the conditions cannot be complied with, the parties must be notified immediately to jointly consider a solution.

2.4. Policy and Practices on Creditors

- (1) The company will strictly adhere to the payment of service fees and/or purchases made from all creditors on time without discrimination against a creditor.
- (2) The company will strictly comply with the contract and conditions as agreed. In case one of the conditions cannot be met, the parties must be notified immediately to jointly consider a solution.

2.5. Policies and Guidelines on Competitors

- (1) The company places importance on the treatment of competitors under the framework of free and fair competition rules.
- (2) The company will not attempt to damage the reputation of its competitors by accusing without truth and justice.



- (3) The company will not seek confidential information of its competitors by illegal, dishonest, or inappropriate means.

2.6. Employee Policies and Practices

- (1) The company realizes the value of human resources and encourages employees to work with the highest efficiency.
- (2) The company will comply with labor laws and provides fair employment conditions and not less than the criteria specified by the law.
- (3) The company will provide training, potential development, and opportunities for employees to advance in their careers, including giving employees the opportunity to develop their work skills.
- (4) The appointment, transfer, promotion, reward and punishment of employees must be done fairly on the grounds of competence, experience, and suitability of employees without discrimination.
- (5) The company will treat all employees equally without discrimination on race, sex, color, religion, national origin, age, sexual orientation, physical disability, or personal characteristics that are not related to work and will supervise so as not to cause harassment or intimidation to personnel at all levels whether from any person or by any means.

2.7. Policies and Practices on Society, Community, and Environment

- (1) The company will operate its business with responsibility to the community, society, and environment by paying attention and giving importance to the safety of the community, society, and environment and the quality of life of the people involved in the company's operations.
- (2) The company will share profits to give back to the community and society and create and preserve the environment through participation in various projects or activities as appropriate.
- (3) The company will strictly comply with the laws and regulations related to the environment.



3. Responsibility for Occupational Health and Safety

3.1. Policies and Practices on Health and Hygiene

The company pays attention to health and hygiene by stipulating a policy to have an annual health check-up and vaccination against infectious diseases and gives the right to reimburse medical expenses by providing adequate and appropriate welfare for employees, not less than the criteria prescribed by law.

3.2. Policy and Practices on Safety and Working Environment

- (1) The company provides a safe, hygienic, controlled working environment and reduces the risk of accidents and health that may occur in the workplace by providing equipment to prevent danger and regular training.
- (2) The company has established a Business Continuity Management Plan (BCP) to support emergency situations or catastrophic events that may occur.

4. Labor Responsibility and Human Rights

4.1. Compensation and Welfare

The company gives importance to all employees, regardless of their work in any department, and treats all employees without discrimination. The company has an important policy to provide appropriate compensation and welfare for all employees who work hard for the benefit of the company, including setting policies and responsibilities to employees and creating a good working atmosphere that will make all employees work together happily.

In addition, the compensation and welfare of each employee may differ in detail depending on their different knowledge, abilities, duties, and responsibilities. However, the company assures all employees that they will be considered for adequate and fair compensation and benefits, not less than the criteria prescribed by law.

4.2. Policies on Training and Development for Executives and Employees

The company attaches importance to the development of executives and employees to strengthen and to develop knowledge, competence, skills, and capabilities of executives and employees at all levels so that they are able to work efficiently, consistent with job goals and the success of the business, including for the executives and employees to have the ability to work more, which will create an advantage in the company's sustainable



competitiveness. It will develop advanced managerial skills for executives and encourage executives and employees to receive continuous training both internally and externally, along with knowledge management to employees through multiple channels. The company will prepare executives and employees to be ready to cope with business competition and rapid changes in the future.

4.3. Policies and Practices on Respect for Human Rights

The company operates its business by giving importance to the rights and freedoms of individuals without violating human rights, gives honor to and respects the rights and dignity of human beings, as well as treating all persons related to the company at all levels and in all aspects with equality according to the laws and principles relating to basic human rights in accordance with international standards.

5. **Responsibility for Relevant Regulations and Laws**

The company complies with relevant laws, rules, and regulations. All directors, executives and employees must have thorough knowledge and understanding of laws related to their duties and responsibilities and act strictly under the framework of laws, rules, and regulations, and must not be involved in knowing, helping, or taking any action that is a violation or breach of the law, rules, and regulations.

6. **Conflicts of Interest**

6.1. Basic Guidelines

- (1) Directors, executives and employees must avoid getting involved in activities that may cause conflicts of interest with the company or its subsidiaries or affectively obstruct the performance of their duties.
- (2) Directors, executives and employees must avoid situations that may influence performance or decision-making or may affect the integrity of the person to the company or its subsidiaries, such as using their position to purchase or employ family members, friends, or close persons and using their position to have influence for personal business interests.



6.2. Receipt of Money or Benefits

Directors, executives and employees should not accept personal items or gifts or offers personally, whether directly or indirectly, from any person due to working on behalf of the company or its subsidiaries. This may lead to a situation that causes a conflict of interest or is against the company's policies and regulations.

6.3. Other Business Operations and Relationships with Customers

Employees are prohibited from running any personal business that is competing with the business of the company or its subsidiaries or undertaking any work for business partners, competitors, customers, or potential customers of the company or its subsidiaries in the future, which has the opportunity to receive benefits, including doing other businesses, investments, holding significant shares in other businesses owned by business partners, competitors, customers, or potential customers of the company or its subsidiaries in the future.

6.4. Disclosure of Interests

In agreeing to enter into a business transaction or any action, if any director, executive, or employee has a stake in the said transaction, whether it is a direct or indirect benefit, they must disclose the interests to the company before entering into the said transaction to prevent conflicts of interest, including doing other businesses, investments, holding significant shares in other businesses owned by business partners, competitors, customers, or potential customers of the company or its subsidiaries in the future.

6.5. Holding a Directorship in Other Companies

A director, an executive, or an employee holding a directorship in another company or will hold a position of director in other companies must disclose the said position to the company, except for serving as a director in a non-profit charity organization, provided that the holding of directorship in other companies shall not be contrary to the provisions of the law or regulations in the company's business operations and they do not use the position in the company or subsidiary as a reference to outside business operations.



7. Providing Information, News, or Interview to the Press or the Public

The dissemination of information and news to the public must be approved by the Chief Executive Officer. The Chief Executive Officer and/or persons assigned by the Chief Executive Officer and/or investor relations is eligible to provide information or answer questions to the public by having an internal unit responsible for notifying the employees of the news or information.

8. Political Activities

The company has no policy to provide political assistance and has a policy of political neutrality. Directors, executives, and employees of the company have the right of freedom to participate or support political activities freely and personally under the provisions of the Constitution. However, they must not pretend to be employees or use any assets, equipment, tools of the company for any political benefit, which must be done outside of office hours.

If directors, executives, or employees participate in political activities, they must be careful not to take any action that will lead to an understanding that the company has supported or is interested in any political party.

9. Protection of the Company's Interests and Taking Care of the Company's Assets

9.1. All directors, executives, and employees must be responsible for taking care of assets of the company and its subsidiaries from damage and loss, and use their assets efficiently for the benefits of the company and its subsidiaries fully without using the assets of the company or its subsidiaries for the benefits of oneself or others.

9.2. Directors, executives and all employees must strictly maintain the confidentiality of customers, business partners, the company, and its subsidiaries by supervising and being careful that confidential documents or information of the company or its subsidiaries do not leak or fall to unrelated persons who may cause damage to the company or its subsidiaries by having to comply with the Personal Data Protection Policy and the Personal Data Protection Law.



10. Compliance with the Business Code of Conduct

In case of doubts or difficulties in making decisions or complying with the business code of conduct, one must use preliminary judgment by asking questions about that action before taking any action as follows:

- (1) Is the action against the law?
- (2) Is the action against the company's policy and organizational culture?
- (3) Is the action acceptable and can be disclosed to society?
- (4) Does the action cause damage to the reputation and image of the company?
- (5) Does the action have a seriously negative effect to the stakeholders of the company?

or inquire with the supervisors in the hierarchical order who are responsible for giving advice in the first place, or inquire directly with the responsible unit.

11. Penalties

After investigation of facts, if it is found that the victim alleged as having committed a violation of the business code of conduct has actually done so, they shall be subject to disciplinary action as required under the rules and regulations concerning with the company's work. The company's judgment is final. If the action is an illegal act, the offender will also be subject to legal penalties.

No employee or any person shall make any accusation or false statement that causes damage to others. If the company finds that the complaint or whistleblowing or provision of any information has evidence proving that it is an act of dishonesty and deliberately causes damage to the complainant, the false reporter will be subject to disciplinary action as required under the company's code of conduct.

12. Channels for Reporting Non-Compliance with the Code of Conduct

In the event of a violation of the business code of conduct, the witness shall report the violation through the company's complaint channels as follows:



10.1. By postal mail

Contact: Chairman of the Audit Committee

Address: Euroasia Total Logistics Public Company Limited

19,21 Motorway Road, Klongsongtonnoon, Lat Krabang, Bangkok 10520

10.2. By electronic mail (E-mail)

Contact: Chairman of the Audit Committee acchairman@etlgps.com

10.3. By phone: (662) 123 1727

10.4. Channel for reporting complaints and clues via the company's website: www.etl.co.th

10.5. Via whistleblowing box/complaint box

10.6. Chairman of the Board of Directors or Chairman of the Audit Committee

10.7. Supervisors whom they trust at all levels (in case it is related to senior executives or directors of the company, notify directly to the Chairman of the Audit Committee)



This business code of conduct policy was considered and approved by the Board of Directors at the Board of Directors' meeting No. 6/2023 on September 11, 2023. It shall be effective from September 12, 2023 onwards.

Note: This English translation is for reference purposes only. In the event of any discrepancy between the Thai original Business Code of Conduct Policy and this English translation, the Thai original shall prevail.

Mr. Krishna Boonyachai
Chairman of Board of Directors

Euroasia Total Logistics Public Company Limited