

**ETHICS AND BUSINESS**

**SABINA CODE OF CONDUCT**

## Acknowledgement and consent form

I fully acknowledge and consent to practice the SABINA Code of Conduct in my work with the strictest adherence and compliance.

.....

(Signature)

(.....)

Position : .....

Department: .....

Date : .....

## Glossary

### SABINA

Sabina Public Company Limited and its affiliated companies.

### BOARD OF DIRECTORS

Board of directors Sabina Public Company Limited and its affiliated companies

### COMPANY

Sabina Public Company Limited and its affiliated companies.

### SABINA PEOPLE

Director, Management, Consultant, and employees of Sabina Public Company Limited and its affiliated companies.

### EMPLOYEES

Management and employees of Sabina Public Company Limited and its affiliated companies.

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## Ethics and Business Code of Conduct

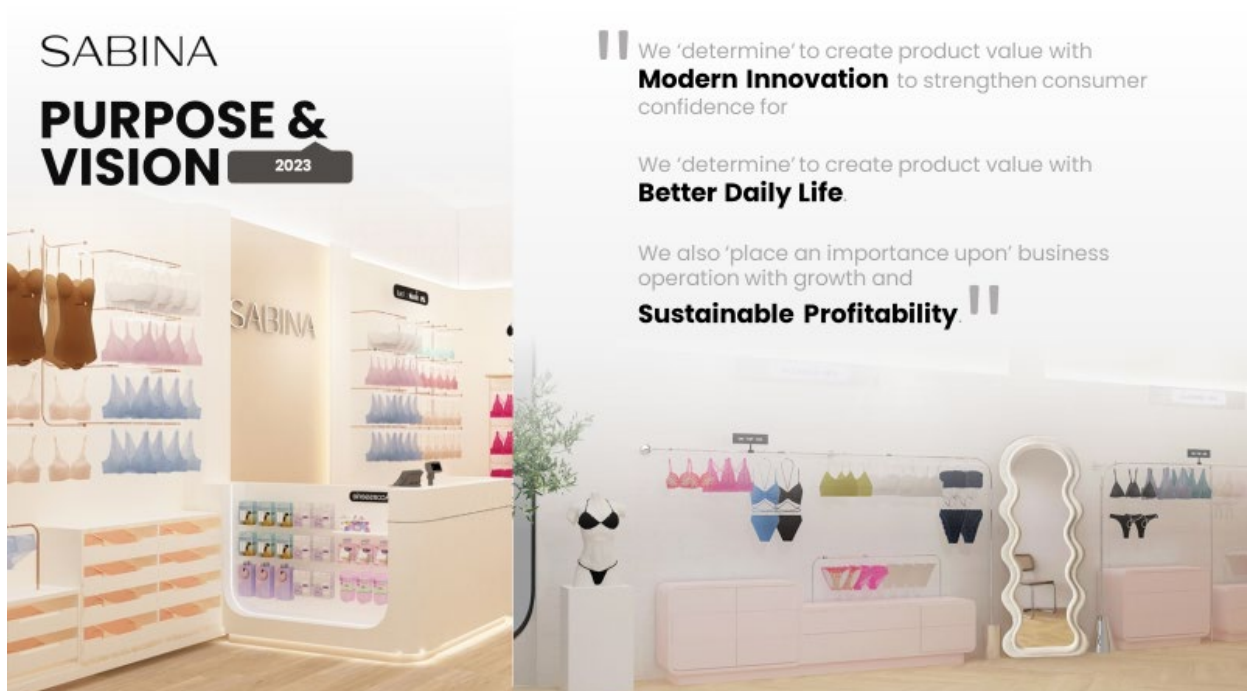
### Introduction

Sabina Public Company Limited and its affiliated companies, a manufacturer and distributor of women's lingerie, is committed to conducting business with integrity and transparency to all stakeholders relating to the Company including shareholders, employees, customers, business partners and / or creditors as well as society and environment by establishing a code of conduct in the responsibility of various parts. Moreover, the company has passed on these codes of conduct and responsibilities to all levels of the Company's employees as a guideline for ethical business conduct as well as a guideline for directors, executives, and employees to follow correctly and appropriately.

#### 1. Code of Business Conduct

The Code of Business Conduct of Sabina Public Company Limited its affiliated companies, is a compilation of process to define the scope, the standard of conduct, and behavior for all personnel of the company, including the board of directors, executives, and all employees, to follow in their business conduct and daily operation by acting in the same pattern under the framework of morality and honesty, in a way that is creative, orderly and equal to build the foundation and maintain the image of the company as an organization with sustainable growth.

##### 1.1 Business Conduct Guidelines



## Purpose and Vision

The company has adjusted the resolution and vision of the company to be more modern and align with the current age and be the long-term goal for business operations of the company. The purpose and vision of Sabina Public Company Limited are as follows:

We 'determine' to create product value with '*modern innovation*'  
to strengthen consumer confidence for better daily life.

We also '*place an importance upon*' business operation with growth and '*sustainable profitability*'.

The long-term goal will be stated in the purpose and vision of the company, which will be the foundation of the company and brand to show the determination of the company to operate the business.



- 01 SABINA PROMISE**  
Customer satisfaction is our ultimate goal.
- 02 DATA-DRIVEN ORGANIZATION**  
Operated with Data-Driven innovation – decision making is implemented on data utilization.
- 03 SUSTAINABLE PROFITABILITY**  
Focusing on sustainable profitability.
- 04 LEAN ENTERPRISE**  
Eliminating wastes occurring at every step of supply chain process to consumers.
- 05 ESG**  
Focusing on sustainable business operation covering environmental, social, and corporate governance aspects.

## Mission

For missions, the company states the operation framework, based on the purpose and vision of the company. Short-term goals (1–5 years) are set as the company mission for clear operations and the minor goals for each section are set using tools to set goals and objective key results for easy result evaluation and real operation. The OKR of every sector in the organization must align with each other to support the overall OKR of the organization to succeed.

The missions of the company are identified as follows.

1. **SABINA PROMISE** : Customer satisfaction is our ultimate goal.
2. **DATA – DRIVEN ORGANIZATION** : Operated with Data-Driven innovation – decision making is implemented on data utilization.
3. **SUSTAINABLE PROFITABILITY** : Focusing on sustainable profitability.
4. **LEAN ENTERPRISE** : Eliminating wastes occurring at every step of supply chain process to consumers.
5. **ESG** : Focusing on sustainable business operation covering environmental, social, and corporate governance aspects.

## 1.2 Complying with local laws and regulations, as well as international human rights principles

The company's personnel are required to comply with applicable laws, regulations, and rules in any country in which the Company operates its business. This includes labor law, anti-money laundering ( AML) and combating the financing of terrorism ( CFT) laws, relevant rules, and international human rights principles.

### Guidelines

- The company's personnel shall comply with the laws, rules, regulations, principles, customs and decorum of the country in which the Company operates its business or has entered into a business contract.
- The company's personnel shall comply with labor law and any relevant regulations, with fairness and adhere strictly to international human rights principles, regarding the activities associated to SABINA business operation both directly and indirectly. For instance, the rights to collective bargaining, freedom of association, protection against anti-harassment in both sexual and non-sexual, human trafficking, forced labor, child labor and other rights. SABINA also focuses specially on the vulnerable groups which include children, the disabled, women, minor ethics, refugees, local tribes, local community, alien labor or the labor hired through the third party, alternative sex and the elderly. SABINA practices aims to avoid any risk of involvement in human rights violations within the Company's business operations.
- The company's personnel must use the due caution in performing their duties and take part preventing the organization from becoming involved in such activities and to protect the company's

data from being used for such activities. They are also required to comply with AML/CFT laws, rules, regulations, and international principles.

- The company's personnel who carry out their duties outside of Thailand shall study the laws, rules, regulations, principles, customs and decorum of the country in which they will work before travelling to such country. If they are unsure about anything, they shall seek the advice of the Legal Office. Employees shall not conduct themselves according to their own assumptions without seeking legal advice.

### 1.3 Anti-Bribery and Corruption Policy

The Board of Directors of the company and subsidiaries has a policy for the company's personnel to conduct business with transparency, refrain from seeking benefits or profits that lead to corruption, and strictly comply with the law for clarity and control in activities that are at risk of corruption. The company and subsidiaries should be careful of the operating guidelines of internal departments that may affect corruption as follows:

#### Guidelines

- The company's personnel do not act or support corruption in order to facilitate the performance, business operation, or the benefits of departments within the company and subsidiaries together.
- Products, raw materials, cutting pieces, premium, gift vouchers, or materials including sales transactions in cash and petty cash are the property of the company and subsidiaries. All of them cannot be used for personal use.
- Information, procedures, processes, reports, and programs about the production formulas, product designs, and membership customers of the company are considered as the intellectual property of the company, which may not be violated and disclosed to anyone. Furthermore, intellectual property of the company and subsidiaries not to be modified and copied for personal use.
- The operating guidelines of the departments must follow the standard procedures and regulations of the company and subsidiaries to seal all channels which enable acts related to corruption as follows:
  - 1) Opening orders for products to sell directly to the target customers. Any actions beyond the specification of the regulation must be pre-approved by an authorized person only.



- 2) Opening orders for products to showcase to the customers at the reasonable quantity. Any actions beyond the specification of the regulation must be pre-approved by an authorized person only.
- 3) Selling products exactly in accordance with the specified price and promotion.
- 4) Record and review sales data based on actual sales and according to the standards, rules and regulations of the Company and the subsidiaries.
- 5) Record and review the information on product returns according to the items returned from the store only.
- 6) Record and review delivery information according to the list of products that have been ordered for sale only.
- 7) Record and review data on import-export expenses according to actual documents.
- 8) Record and review information on expenses for organizing special promotional activities to ensure they are according to the plan.
- 9) Avoid marketing communications that suggest direct comparison with the competitors' products or services.
- 10) Opening product orders for online sales based on the items and quantities ordered by the customer only.
- 11) Design the products for the company and subsidiaries only, whereby outside work must not be brought into the workplace. The interests of the company, subsidiaries, and customers must be considered as top priorities.
- 12) Research and develop products for the company and subsidiaries only whereby outside work must not be brought into the workplace. The interests of the company, subsidiaries and customers must be considered as top priorities and confidential information about the products of the company and subsidiaries are not to be disclosed.
- 13) Must remain neutral in the procurement process not allowing any irrelevant factors to affect selection decisions, and to comply with the standards and regulations of the company and subsidiaries strictly.
- 14) In case of adjusting / changing raw materials or amendment of the costs, the matter must be received from the purchasing department and merchandiser only. After completing the amendment, the relevant agencies must be notified.

- 15) Receiving and disbursement of raw materials including cutting pieces, the accuracy of documents must be reviewed to ensure that they match with the raw materials.
- 16) Recruitment, training, evaluation, compensation, promotion, and the termination of the company's personnel must be performed correctly and fairly in accordance with the criteria of the company and subsidiaries.
- 17) Follow up debt and prepare reports on any abnormalities associated with debt collection honestly.
- 18) Count products at the store and prepare a report on any abnormalities found related to the product count honestly.
- 19) Check the accuracy and completeness of the documents before billing, receiving billing, recording the accounts, and adjusting accounting entries.
- 20) Record accounts, adjust account items, and prepare accounting reports in accordance with the accounting policies of the company and subsidiaries that are under the accounting standards and other related laws with the approval of the authorized person.
- 21) Prepare accurate accounting / financial reports with complete and accurate documentations
- 22) Prepare financial statements, accounting / financial reports and tax return forms for submission to relevant departments as well as disseminating financial information to general investors based on actual information that has been reviewed and approved by authorized persons.
- 23) Accounting / financial documents are to be filed in an appropriate location for the duration required by the law.
- 24) Review expenses to be reimbursed to ensure that they must be expenses incurred from the operations of the company and subsidiaries with reliable evidence supporting the disbursement which has been examined and approved by authorized personnel.
- 25) Make payments honestly according to the documented evidence of disbursement and protection double-payment prevention measures are required.
- 26) The financial reports should be prepared with honesty.

### **Political Support**

The Board of Directors of the company and subsidiaries has a policy for the company's personnel to be politically neutral, and to refrain from taking actions to support any political parties or persons with political power either directly or indirectly. The company and subsidiaries regard respect for political rights and liberties in accordance with the law and adhere to a democracy with the King as the Head of State.

#### **Guidelines**

- The company's personnel strictly abide by the law.
- The company's personnel use their political rights in accordance with the constitutional law such as voting rights, etc.
- The assets of the company and subsidiaries are not used to support political activities of any political parties, political groups, or politicians in order to receive undeserved privileges, or to formulate joint contracts.
- The company's personnel avoid expressing political opinions within the company and subsidiaries which may cause conflicts within the company and subsidiaries.

### **Funding and Charitable Donations**

The Board of Directors of the company and subsidiaries has a policy that the company's personnel be committed to conducting business with transparency and not seeking any benefits or profits that lead to corruption. The company has established procedures and controls on the granting of grants and charitable contributions with the approval of the authorized persons of the company and subsidiaries. It is also monitored to ensure that donations and charitable donations do not lead to corruption.

#### **Guidelines**

- The company's personnel strictly adhere to the anti-corruption policy on donations and charitable donations.
- Funding and charitable donations must be made on behalf of the company and subsidiaries only, and they are not an excuse for corruption. In addition, the evidence must be correct, complete, and reliable in order to be able to be examined.

### **Accepting and Giving Gifts, Properties, or any Other Benefits and Entertainments**

The Board of Directors of the company and subsidiaries has a policy that the company's personnel be committed to conducting business with transparency and not seeking any benefits or profits that lead to corruption. The company has set a policy on accepting and giving gifts, properties, or any other benefits and entertainments including procedures and controls that can be verified to ensure the confidence of accepting and giving gifts, property, or any other benefits and entertainments that meets the policy of the company and subsidiaries, and does not lead to corruption.

#### **Guidelines**

- The company's personnel comply with the policy related to anti-corruption, giving gifts, properties or any other benefits and entertainment are strictly.
- The company and subsidiaries have established policies relating to giving gifts, property or any other benefits and entertainment to reduce the impact on the decision in the performance of duties arising from embarrassment or a conflict of interest.
- The company and subsidiaries do not prohibit accepting and giving gifts with the company's logo in order to maintain business relationships or act according to tradition and morality.
- Gifts, properties, or other benefits should not be cash or cash equivalents and must not be illegal.
- Entertainment must not be obligated or create a feeling of corruption in return. Moreover, it must not violate any regulations, rules, and laws.
- In the case of selection, price negotiation, and procurement of goods, raw materials, sales areas, or any other benefits for the company and subsidiaries, there must not be any claims to receive or giving of gifts, properties, or any other benefits and entertainment for bribery, leading to undeserved privileges or the establishment of a joint contract as well as resulting in the authorities abstaining from complying with the established regulations.
- The company and subsidiaries have communicated and promoted to the company's personnel including people involved in business operations to create understanding and guidelines on giving gifts, properties, or any other benefits and the entertainments of the company and subsidiaries.

## **2. Company Code of Conducts**

The company has established good practice guidelines of the Board of Directors to demonstrate the intention to operate the company's business with transparency, morality, responsibility to the stakeholders, and professionalism, which is considered the code of conduct in performing the duties as follows.

### **2.1 Compliance with Applicable Laws, Company Rules, and Relevant Regulations**

2.1.1 Compliance with the laws, rules, regulations, and various notices related to the company's business operations are as follows:

1) Directors, executives, and employees must comply with the laws, regulations, and requirements of the Stock Exchange of Thailand, the Securities and Exchange Commission, and other relevant agencies.

2) Directors, executives, and employee are required to comply with the company's corporate governance and business ethics policies as well as other policies that have been promulgated.

2.1.2 Perform duties with impartiality. If there is a matter in which any director has a conflict of interest in the meeting, that director must leave the meeting room and refrain from participating in any consideration of the matter.

2.1.3 Avoiding conflicts of personal interest for transparency and efficient management as follows:

1) Do not misuse the information obtained in the performance of duties for the benefit of oneself or others.

2) Do not misuse the corporate secrets and do not disclose the corporate confidential information even after the condition has expired or ceased to function.

3) Do not pursue personal advantage from being a director of the company.

4) Do not create obligations that may later conflict with duties.

5) Do not accept any items or benefits which is in contrary to the interests of the organization.

6) Prioritize the Company's benefits over personal interests and avoid any conflicting interests.

2.1.4 Keep corporate confidential information from leaking to unrelated parties that could damage the organization or stakeholders except in the case compliances with the law.

2.1.5 Acquisition or disposition of listed securities of directors, spouses, and underage children shall be in accordance with the Notification of the Board of Governors of the Stock Exchange of Thailand Re: Disclosure of Information and Other Acts of Listed Companies Concerning the Acquisition and Disposition of Assets B.E. 2004.

### **2.2 Conflict of Interest**

#### **2.2.1 Conflict of Interest**

The Board of Directors complies with the rules and regulations of the Securities and Exchange Commission and the Stock Exchange of Thailand whereby the Board of Directors has clear guidelines for taking care of and eliminating any conflicts of interest prudently with rationale.

In conducting a transaction that may have a conflict of interest, the company will disclose information to the meeting by specifying the transaction value, counterparty, reason, and necessity of such transaction with transparent information that can be verified. If any transaction needs to be approved by the Board of Directors and / or the shareholders' meeting, such transactions will be reviewed by the Audit Committee first and opinions on such transactions will be given.

In the case that the Board of Directors has opinions that differ from the Audit Committee, the Company will disclose such differences as well. In the event that a director has a conflict of interest in any agenda, that director will not have the right to vote on that agenda according to the regulations of the Stock Exchange of Thailand.

In addition, the Board of Directors has set guidelines for the Board of Directors, Executives, and relevant persons to report their interests or those of related persons as stakes in business management of the company or subsidiaries for providing the company with information to support the implementation of the connected transactions through the Board of Directors meeting every quarter.

According to the policy that directors, executives, and employees are prohibited from taking opportunities from being directors, executives, or employees of the company to pursue personal benefits and / or benefits of related parties, the company therefore stipulates the following guidelines.

- 1) Avoid making transactions that are connected with oneself and / or related parties that may cause a conflict of interest with the company.
- 2) In the event that such transaction is necessary for the benefit of the company, such transaction shall be made as if it was a transaction with a third party having a commercial agreement in the same manner as an ordinary person should do with the general contract with the negotiation power without influence of the director, executive, or related person. Moreover, the concerned persons must not be involved in the approval and has a duty to comply with the requirements of the Stock Exchange of Thailand and the Securities and Exchange Commission regarding the disclosure of connected transactions.
- 3) In the event that a director, executive, or an employee becomes a director, partner, or an advisor in another organization, that position must not contradict the interests and the direct duties of the company.

- 4) Review transactions that contain or may have conflicts of interest between shareholders, directors, management, and other potential conflicts of interest according to the guideline to be confident that such transactions are appropriate, fair, transparent, reasonable, and all information is disclosed with accuracy and completeness. In addition, a form of report on disclosure of suspected conflicts of interest of the company shall be included in the Corporate Governance Manual.
- 5) The Board of Directors is required to report the interests of company directors and executives and must always report to the company their interests and the interests of related persons within three months from the date of appointment or the date of change.
- 6) The Company has disclosed the connected transactions which the Company has complied with the rules of the Securities and Exchange Commission of Thailand by disclosing the details of the transaction by specifying the name of the person who has entered into the connected transaction. Relative to the nature of the transaction, terms/policy, price and value.
- 7) In the case of related persons taking part or holding shares in businesses that are in competition with the business of the company which may create a conflict of interest with the company, if they are directors, executives and related persons, they must notify the Board of Directors in writing. If they are employees, the supervisor must be informed in writing and report to the company secretary.

#### 2.2.2 Confidentiality and Usage of Inside Information

The Company has a policy and method to prevent directors, executives, and employees from exploiting the company's inside information that has not yet been disclosed to the public for their own benefit including trading in the company's securities as follows:

1. The company has provided a firewall system to prevent unauthorized people from entering or destroying important information of the company. There is also an Anti-Virus system to prevent the virus from spreading or destroying information.

2. The company has established a security system for employees in accessing the information for each program software to categorize the level of employees authorized to access the information.

3. The company has established the terms of maintenance and protection of the use of inside information in the employment contract and work regulations, corporate governance policy, and non-

profit seeking work practices to prevent employees and related persons from disclosing any information or news that is confidential and not yet publicized.

4. The company will notify the management of inside information and buying or selling the company's securities should be avoided or refrained within the 7 days before the financial statements are released to the public. If trading occurs during that period, the company has penalty measures in place and notifications of the penalty are available, starting from verbal admonition, written warning, temporary suspension, and termination respectively. In addition, the company has taken corrective measures by allowing the perpetrators to reverse the transaction and donate the profits from the trading shares to charities.

5. the Company has regulated that directors and top-level executives must notify the Board of Directors regarding their securities trading at least 1 day prior to making the transactions.

6. Third parties participating in the investigation, preparation, or transaction of information that may affect the movement of the company's securities prices are required to enter into a confidentiality agreement with the company until the information is disclosed to the Stock Exchange of Thailand and the Securities and Exchange Commission.

7. The company has a simple shareholding structure. Most of the connected transactions are normal business transactions.

8. The company follows the regulations of the Stock Exchange and the Securities and Exchange Commission Regarding the rules and procedures for making connected transactions, criteria for the acquisition and disposal of assets, etc.

### **2.3 Responsibility for Company's Assets**

The company has policy encourages the executives and employees to use resources and assets of the company efficiently in order to increase competitiveness and provide good service to customers. The company has established the following guidelines for executives and employees:

1. Use the Company's assets and resources conservatively yet to achieve the maximum benefits.

2. Cooperate with one another to prevent the company's assets from depreciation or wrongfully lost.



## **The Company's Intellectual Property, Data, and Information Technology**

The company places great importance on the intellectual property of the company which includes the name of the company, logo, copyright, patent, trademark, trade secrets, innovation, data, and information technology, as the following stipulations:

1. Executives and employees are required to comply with intellectual property laws in every country in which the company invests, as well as announcements, orders, and regulations set by the company.
2. Executives and employees are required to maintain and protect the company's intellectual property from damage, loss, and ensure that the intellectual property is used in the best interest of the company.
3. Executives and employees have a duty to keep trade secrets and company information in the most secured location.
4. Executives and employees must use the information technology provided by the company for the Company's business only.
5. Executives and employees must not disclose the password used to access the company's information system to anyone who is not involved.
6. Executives and employees may not distribute, copy, or use any illegal software in the company.
7. Executives and employees must not use Company's e-mail or computer systems to send vulgar, obscene, harassing, threatening, and slandering messages to others as well as avoid entering illegal websites or violating good morals.
8. Executives and employees must respect the intellectual property rights of others, not to infringe copyrights, trademarks, or use other people's work for personal gains or the company's that may cause damages to the company.
9. Security of information systems, including not disclosing the password that accesses the company's information system to others.

### **2.4 Non-discrimination and anti-harassment policy**

Sabina Public Company Limited recognizes and appreciates the benefits of leveraging the diverse and varied thoughts, skills, and experiences of its workforce to drive sustainable organizational success. The Company therefore fosters a respectful work environment where employees can coexist based on their differences, without discrimination, preference, or harassment in any form.

**Discrimination** refers to treating individuals differently, impeding, or providing special privileges to any person or group based on their characteristics, including race, nationality, ethnicity, skin color, lineage, belief, religion, social status, sexual preference, gender, age, physical presence, disability, language, political view, marital status, or any others that lead to discrimination.

**Violation/Harassment** refers to the display of unwanted behaviors that violate/harass personal space, impede, intimidate, or are unfriendly, and which hinder work performance. These actions, regardless of intent, have an impact on the physical and mental well-being of the affected individuals whether or not the behavior is sexually motivated.

The Company therefore set a policy for directors, executives, and employees to comply with the following guidelines:

**1. Recruitment, Selection, and Placement of Personnel**

- 1) Job vacancies shall be advertised without any discriminatory language.
- 2) The recruitment and selection of personnel shall not discriminate based on including race, nationality, ethnicity, skin color, lineage, belief, religion, social status, sexual preference, gender, age, physical presence, disability, language, political view, marital status, or any others that lead to discrimination. The process shall be based on the required qualifications for the position advertised.
- 3) Salaries, benefits, and working conditions offered to all applicants shall be equal according to the standard of the position advertised.
- 4) Job applications and supporting documents shall be kept confidential and not disclosed to anyone not involved in the recruitment process, and the persons who will handle the information should be designated.
- 5) Psychological and physical tests before employment shall be relevant to the position.

**2. Personnel Development**

- 1) Development management must be universal and non-discriminatory, taking into account the necessity of developing each individual for their respective positions and for professional advancement.
- 2) Approval of training programs must be free from discrimination.
- 3) Programs aimed at promoting awareness of objectives and requirements according to this policy must be provided to all employees through training.

**3. Performance Evaluation**

- 1) Performance evaluation guidelines must have clear and transparent criteria, based on actual job performance and behaviors that align with organizational values. During

evaluations, there shall be face-to-face discussions between supervisors and subordinates to ensure mutual understanding of the evaluation results.

#### **4. Employee Benefits and Compensation**

- 1) Employee benefits and promotions shall be managed according to established policies, with transparency and clarity, under consistent standards.

#### **5. Job Transfer/Resignation**

- 1) The job transfer process must be based on equality and consideration of career advancement opportunities, without discrimination.
- 2) Resignation must be due to poor job performance below Company standards, even after giving the employee opportunities to improve and closely monitoring their progress. It can also be due to disciplinary action or health reasons diagnosed by a doctor, or for other reasons not related to discriminatory practices.

#### **Steps and guidelines for addressing and handling incidents of discrimination and violation/harassment:**

1. The victim should immediately inform the perpetrator to stop the action that is being taken.
2. If the perpetrator ignores the request and continues with the action, the victim should report the incident directly to their supervisor, department head, or human resources manager, as appropriate.
3. The relevant human resources manager at a manager level or higher should question the victim, perpetrator, and any witnesses (if any) within 7 days of receiving the report.
4. A committee of at least three members should be formed by the relevant human resources manager at a manager level or higher to investigate the incident.
5. Disciplinary action should be taken against the perpetrator or the person submitting the false report based on the investigation and evaluation of the committee.
6. If the incident is a criminal offense and legal action needs to be taken, the legal team must be involved in the investigation.
7. The victim who reports incidents of violation/harassment should be protected appropriately to prevent any negative consequences from the report.

#### **2.5 Information disclosure and communication**

Disclosing information and communicating about SABINA to internal and external parties in any form, including in writing, verbally or at a press conference, must be done appropriately, clearly, transparently, and in line with SABINA policies and relevant laws.

1. Announcing or disclosing information about the company's business operations or information that may affect SABINA business to the media and external parties must only be done by the Chief Executive Officer and those with direct authority or those assigned. Such actions shall comply with company policy.
2. Disclosing important or internal information that has not been made public must be done only by authorized spokespersons, and is to be done with extreme discretion, accuracy, completeness, and on the basis of the truth.
3. In disclosing other information within your rights and responsibilities, you shall disclose factually accurate information and refrain from causing any misunderstandings. Disclosing information must not interfere with your duties or responsibilities.
4. Disclosing information and expressing personal opinions on social media or other types of media shall be done with extreme discretion, and you must clearly state that your comments are your own personal opinion.
5. If you encounter any information or references made about SABINA that are inappropriate and may affect the company's image and reputation, you must notify a relevant department or your supervisor immediately.

### **3. Code of Conduct towards Stakeholders**

#### **Code of Conduct for Responsibility to Shareholders**

Sabina Public Company Limited is committed to responsibility and creating the highest satisfaction for the Company's shareholders. The Company is well aware that Shareholders are the owners of the business and the company. It is responsible for creating long added value for shareholders. the company has set a policy for directors, executives and employees to follow the guidelines as follows.

1. The company will perform duties with honesty as well as any action With sincerity and fairness to major and minor shareholders which brings the greatest benefit to the public.
2. The company will manage the organization with caution, prudence and transparency by bringing knowledge and management skills to be applied to the fullest extent to prevent damage to shareholders.
3. The company no action may cause conflicts of interest to the Company.
4. The Company will report to shareholders equally about the future trend of the company both in positive and negative aspects which is based on possibility. There is enough supporting and rational information.
5. The company not seeking benefits for oneself and those involved using any corporate data which has not yet been released to the public.

6. The company to present reports on the Company's status, operating results, financial, accounting and other reports on a regular basis and completely and truthfully.
7. The Company do not disclose confidential information which has a detrimental effect on the company to outsiders.

#### **Code of Conduct in Responsibility towards the Employees**

Sabina Public Company Limited is committed to developing, enhancing, and building confidence for employees at all levels by set policy and the following practice guidelines.

1. The company offers fair compensation and welfare to employees.
2. The company ensures that the work environment is always safe for the lives and properties of employees.
3. The company will provide an evaluation system. Any job appointments and transfers, compensation for performance, rewarding, and penalties for employees will be given honestly and equally based on fairness and the employees' knowledge, competence, and suitability without discrimination and verifiable.
4. The company will pay attention to the development of knowledge and efficacy of the employee by providing an opportunity for employees to develop themselves thoroughly and regularly.
5. The company will accept any comments and suggestions from all level of employees equally.
6. The company will strictly comply with the laws and regulations related to employees.
7. The company will manage the business by avoiding any injustice actions which may affect the job security of employees or may threaten and putting pressure on the employees' mental health.
8. The company will treat employees with courtesy and respect the employee's individuality and human dignity.
9. Respect human rights, without discrimination against any persons in employment, including recruitment, payroll, other benefits, career advancement, disciplinary action, employment termination, or retirement due to the similarities or differences in race, religion, gender, age, education, disability, gender preferences, nationality, status, political opinions, or social or racial origin, as well as respect to individual rights and freedoms, and protection of personal information.

10. The company will create an understanding on the code of conduct and the role that employees can perform in their work to encourage behaviors that are within the framework of the code of conduct thoroughly.
11. The company will provide an opportunity for employees to report any violations to the regulations of the organization to the Board of Directors.

#### **Code of conduct on Responsibility towards the Customers**

Sabina Public Company Limited is committed to be mindful of business integrity as well as the customer's maximum benefits by set policy and the following guidelines.

1. The company will produce quality products at a level that is acceptable to the market.
2. The company will disclose information about products completely and accurately, without distorting the facts and taking into account the benefits of the customer as a top priority.
3. The company will provide a guarantee on the product quality covering an appropriate amount of time.
4. The company will not deliver products to customers with the knowledge that the product is of low quality, defected and damaged without providing a clarification to the customer.
5. The company will set up a system for customer complaints about products and services to ensure that customers can get a timely response.
6. The company will provide clear product labels including information such as product code, size, price, production date and product maintenance.
7. The company will maintain the customer's confidentiality strictly including not using the customer's information for personal gains or related person's in a wrongful manner.
8. The company will find ways to reduce production costs by maintaining product quality standards in order to continually increase the benefits for customers.
9. Consider the utmost satisfaction of customers with fair pricing and a sense of responsibility towards customers by providing prompt customer service, having a courteous attitude, and not discriminating.
10. The Company's businesses shall be operated in an honest, earnest, and just manner. No action shall be taken to violate customers' rights.
11. The Company shall never demand, receive, or consent to the direct or indirect receipt of any property or other dishonest benefit from a customer.
12. Customers must be treated with politeness, genuineness, and to be trusted by its customers.

## Code of Conduct on Responsibility towards Business Partners and / or Creditors

Sabina Public Company Limited is committed to operating the business with integrity and mutual benefits with trading partners and/or creditors by strictly abide by laws and regulations by set policy and the following guidelines.

1. The company will not request, take or pay any benefits that are considered as trade dishonesty from and/or to partners and/or creditors, Direct and indirect.
2. If there is information that any benefits have been requested, taken or paid that shows dishonesty, the company must disclose details to trading partners and/or creditors and jointly resolve the problems fairly and swiftly.
3. The company will strictly comply with all conditions of creditors, whether it is a matter of the purpose of fund usage, repayment, caring for the quality of the collateral, and any matters that have been agreed with the creditors.
4. If the Company is unable to comply with any of the conditions, the creditor must be notified in advance to jointly consider a solution to the problem based on reasoning.
5. The company will report the company's financial status and financial information to customers and/or creditors with accuracy and honesty regularly.
6. Conduct procurement by treating all suppliers equally, disclosing accurate and transparent information, not being biased and discriminatory, not taking advantage of suppliers, and creating fair competition among suppliers. Provide suppliers with adequate time to prepare supporting documents and quotation documents.
7. Trading partners' secrets or information shall be treated with confidentiality and shall not be wrongfully exploited for personal gain or the benefit of a related person.
8. The Company shall build good relations and understanding with trade partners, which will serve as the basis for knowledge exchange. The development and creation of value added to goods and services.
9. Unpermitted usage of business partner's intellectual properties, either copycats or altered products, for company's own benefit are prohibited.

### **Code of Conduct on Responsibility towards Competitors**

Sabina Public Company Limited is committed to conducting business with good ethics towards competitors by set policy and the following guidelines.

1. The company will behave within the framework of good competition.
2. The company shall not attempt to destroy the reputation of trade competitors by making false accusations without any facts.
3. The company shall not seek confidential information of the competitors through dishonest or improper means such as paying bribes to employees of competitors.
4. The company will support and promote free trade with fairness and will not monopolize or force the company's customers to only do business with the Company.
5. The company encourages cooperation with trade competitors that is beneficial to the customers, not to monopolize the allocation of income and market share, reducing the quality of products and services, and pricing of goods and services that lead to overall negative impact on the customers.
6. The company will compete within the frame of fair competition rules.
7. The company will not seek the confidential information of its competitors through any means that are dishonest, inappropriate or illegal.
8. The company will not degrade the reputation of trading partners by slandering or take any actions without factual evidence and fairness.

### **Code of Conduct on Social and Environmental Responsibility**

Sabina Public Company Limited is mindful and cares about the safety of the society, the environment, and quality of life of the people. The Company also places importance on the conservation of natural resources and environment by set policy and the following guidelines.

1. The company will not take any actions that will impact on damaging the natural resources and the environment.
2. The company will support activities that will enhance the betterment of the society and the environment regularly.
3. The company will instill the awareness of social and environmental responsibility among employees at all levels continuously and seriously.



4. The company will oversee that the Code of Conduct is strictly adhere to in accordance with the spirit of the laws and regulations issued by the governor.
5. The company will not assist or encourage circumvention of any laws or regulations.
6. The company will cooperate with the supervisory authority and report information regarding violations or non-compliance with laws or regulations with that agency.
7. The company will not operate or get involved in bribery, corruption, or use of one's authority for personal gains.
8. The company promotes environmental training for employees both within the organization and sends them to other external organizations to train.
9. Businesses shall be undertaken in accordance with laws, regulations, and policies on the environment with due regard to the impact on natural resources and the environment. Regular revision and assessment of the Company's environmental performance shall be performed.

#### **Code of Conduct for Occupational Health and Safety Responsibilities**

Sabina Public Company Limited have cares about hygiene. and safety and working environment by set policy and the following guidelines.

1. The company have annual health check-up
2. The company have medical expenses for employees in the organization. including basic medical equipment for employees and adequate and appropriate welfare.
3. The company provides a safe and hygienic working environment. that controls and reduces the risk of accidents and health that may arise from the workplace. The safety of the working condition, work environment, and work procedures shall be improved.
4. The company has checked the light, color, sound, dust, smoke in the workplace.
5. The company has equipment to prevent danger. and have regular training.
6. Business undertakings shall comply with safe and healthy work environment laws, regulations, and policies with due regard to the safety of life and property, as well as to the impact on the health of employees, trading partners, and stakeholders. Regular monitoring and safety assessment shall be conducted.
7. A safe workplace culture shall be fostered for the entire organization to ensure sustainable and safe operations.

#### **4. Code of Conduct for Employees**

1. Employees shall perform their duties responsibly, honestly and with loyalty for the advancement and stability of the company and the employees themselves.
2. All employees shall maintain and create unity and solidarity among employees, working together and solve problems as an efficient team.
3. Employees will take care and perform their duties for the company with responsibility, sacrifice, and patience to build a quality, efficient and profitable company in order to drive the Company towards Excellence.
4. All employees will use the company's assets efficiently, conservatively, and with care to prevent depreciation or loss, as well as refraining from using the company's assets for personal gains.
5. Employees will strictly protect the confidentiality of customers, partners, and the company.
6. Employees shall cooperate and assist in working with all colleagues for the benefit of the company and respect the rights of other employees who are united in the same company.
7. Employees should be attentive and help each other to maintain the good working environment and create a safe work practice to create a workplace that is always clean, safe, and pleasurable.
8. Employees will share knowledge and work experience to their colleagues on the essential basis of the Company's benefits and objectives.
9. Employees will not slander the company/management, and colleagues without facts and fairness.
10. Employees must notify the relevant departments and management if it is found that there is any wrongdoing or illegal conducts in the company.
11. Employees shall not exercise their authority illegally for their own personal gains or others'.
12. Employees shall not take any actions which is detrimental to the image and reputation of themselves and the company.
13. Employees shall be determined and strict about all activities that will enhance the Company's quality, efficiency, and drive towards excellence.

#### **5. Ensuring Compliance with Codes of Conduct**

The company determines that it is the duty and responsibility of all directors, executives, and employees to acknowledge and understand and strictly adhere to the policy outlined in this code of conduct, as it is not a voluntary request, and employees may not claim that they are unaware of the established guidelines.

The executives at all levels in the organization are responsible for, and it is important to ensure that employees under their command line understand and strictly comply with business code of conduct manual, and the code of conduct at work.

It is undesirable for the company to take any illegal actions, contrary to good ethics. Any directors, executives, and employees who violate the established code of conduct will be subjected to strict disciplinary action and may be subjected to legal prosecution if such misconduct is illegal.

The Board of directors designated that the **business ethics** manual shall be reviewed annually and there shall be reports on the follow-up of ethical practices strictly to the Audit Committee and the Board of Directors.

#### **6. Whistleblowing, Complaints, and Protection of the whistleblower**

The company and subsidiaries have established measures reporting of complaints, illegal actions, unethical actions, or behaviors that may lead to corruption or misconduct of the company's personnel, related persons, and stakeholders through the reporting and suggestion channels through internal audit department which acts as a complaint and suggestion handling agency as follows.

##### **Procedures and Processes when Receiving a Clue or Complaint**

The company provided opportunities for the company's personnel, related persons, and all groups of stakeholders to directly contact / complain about problems or matters to the Board of Directors. There were channels for reporting clues and complaints to guide the development and create sustainability for the organization as follows:

- The complaint recipient collects facts related to the violation or non-compliance with the company and subsidiaries' anti-corruption policy.
- The complaint recipient reports the facts to the independent directors and performs an investigation of the facts to be used in the consideration of the complaint by distinguishing matters related to the anti-corruption policy issue, political support grants, and charitable contributions, and accepting gifts, property or other benefits, and entertainment.
- The complaint recipients presented to the Anti-Corruption Commission for investigation of the facts with a period not exceeding 30 days from the date of receiving complaints, along with setting measures for actions in order to stop the violation or non-compliance with the anti-corruption policy. The Anti-Corruption committee would screen the information and send it to the company's Board of Directors for further considerations.

- The complaint recipient has reported the investigation results to the complainant within 7 days from the investigation completion date. If the complainant exposes him/herself in a critical case, the complaint recipient must report the investigation results to the Chairman of the Board, and/or the Board of Directors for acknowledgment.
- If the accused has actually committed corruption, it is considered a violation of the anti-corruption policy and must be subjected to disciplinary action in accordance with the company and subsidiaries' regulations. If the accused violate the law, they are subject to legal punishment.
- Ensure that there is a procedure to prevent repeated wrongdoing by having relevant units and supervisors monitor behavior and warn wrongdoers not to repeat their actions, as well as ensuring all employees do not engage in misconduct.
- When the Board of Directors receives reports of violations or non-compliance with the Company's anti-corruption policy and business ethics, as well as those of its subsidiaries and indirect subsidiaries, the relevant supervisory agency of the wrongdoer shall be notified to find ways to address the issue going forward.

#### **Channels for Whistleblowing, Complaints and Counseling**

- Internal Audit Department via email: [GRP\\_AUDIT\\_HO@sabina.co.th](mailto:GRP_AUDIT_HO@sabina.co.th)
- Internal Audit Department via phone: 02-422-9400
- Internal Audit Department via Post Office: Internal Audit Department
- Or report directly through the audit committee

Sabina Public Company Limited

12 Arun Amarin Road, Arun Amarin sub-district,  
Bangkok Noi district, Bangkok, 10700.

#### **Whistleblower Protection Measures**

- Complainants can choose not to expose themselves if they think it is unsafe for themselves and the people involved. However, if the complainant exposes him/herself, the Company and subsidiaries will be able to report progress and clarify facts to the complainant.
- The complaint recipient keeps the information received from the complainant confidential and takes into account the safety of the whistleblower by setting protection measures for the complainant and / or person providing information and / or cooperation in data verification. Complainants will be protected from unfair practices such as the change of job position, the

change of job description, the change of place of work, suspended orders, threats of disruption to work performance, and termination due to the complaint, etc. In regard to general performance complaints will be kept confidential with the Chief Executive Officer or the Internal Audit Department and complaints on the senior management will be collected by the secretary of the audit committee to report to the audit committee directly.

In addition, the company provides channels for clues reporting or complaints for any related personnel to file a complaint in the event of a violation of the law and the code of ethics of senior management. The violation of the company's business ethics includes the behavior that implies corruption and inequality, via the following methods

Mail: The Chief Executive Officer or Chairman of the Audit Committee

Sabina Public Company (Limited)

12 Arun Amarin Road Kwang Arun Amarin Ket Bangkoknoi Bangkok 10700

The general complaint information will be confidentially kept only to The Chief Executive Officer or the Audit Committee. The company will not disclose the information of the whistleblowers and treat them fairly. As for the misconduct of top management, the complaint will be collected directly by the audit committee and the company will take further steps.

## **7. Discipline**

The company considers that the business codes of conduct outlined herein is a discipline that all directors, executives, and employees must strictly abide by. Violation or non-compliance is a breach of discipline according to the personnel management regulations.

Directors, executives, and all employees have duties to comply with and encourage others to comply with business code of conduct. Any of the following acts is a disciplinary offense.

1. Non-compliance with Business Code of Conduct
2. Suggesting, promoting, and encouraging others not to comply with the business code of conduct.
3. Ignore or neglect when encountering violations or failing to comply with the Code of Conduct if having the knowledge.
4. Refuse to cooperate and hindrance of the investigation of facts.
5. Unfair actions against complainants from reporting non-compliance with business code of conduct.