

Translation Code of Conduct and Code of Ethics

Teka Construction Public Company Limited ("the Company") is dedicated to operating business in a transparent, honest, and ethical manner, committed to encouraging the Company's directors, sub-committees, executives, and employees, and responsible for safeguarding the interests of all stakeholders to conduct business properly, to adhere to the Principles of Good Corporate Governance as outlined in the Code of Conduct and Ethics.

As a result, the Company has this Code of Conduct and Business Ethics in a written form, which compiles good practices in various areas for the Company's directors, Sub-committees, executives, and employees in accordance with the relevant legal requirements, rules, and policies of the Company set forth, in order to assist the Company's directors, sub-committees, executives, and employees in using this as a framework and guideline for business operations, which will help the Company to be able to conduct business with transparency, honesty, and in accordance with the law and avoid activities that may lead to conflicts of interest with the Company's business. This will instill confidence in investors and other stakeholders, as well as generate long-term growth.

Section 1: Code of Conduct and Ethics in Business Operations in Various Areas

1. Compliance with laws, regulations and regulations related

The Company places a high priority on adhering to applicable laws, regulations, and rules wherever it operates, and its directors, subcommittees, executives, and employees must respect the law, not violate it, and perform duties strictly in accordance with good practice by following the guidelines below.

- Must study and understand the laws, regulations, rules, orders, and announcements that pertain to their own duties and responsibilities, as well as operating procedures, and adhere to them strictly.
- Dose not provide assistance or support in any actions of that circumventing or violate in any illegal action, regulations, rules, orders, and any announcements of the company
- If found any action that illegal violates or fails to comply with the Company's laws, regulations, rules, orders, or announcements report to the supervisor or to the whistleblowing policy or complaint channels as soon as possible.

2. Anti - Fraud and Corruption

The Company is committed to conducting business in a fair, transparent, and legal manner and this commitment extends to all of the Company's operations and departments. The company encourages subcommittees, executives, and employees at all levels to prioritize and be aware of the importance of working together to combat fraud and corruption, as well as to establish an internal control system to prevent fraud and corruption and the receipt or giving of bribes in any form by following the guidelines below.

- Bribery in any form, whether direct or indirect, is not acceptable.
- Do not engage in any act that demonstrates the intent fraud and corrupt, such as paying or receiving bribes from government and private officials or stakeholders related to the Company in order to obtain or maintain a business or competitive advantage, or for the benefit of oneself and those involved.
- Failure to perform or refrain from performing one's duties, or abuse of power in one's position, in order to obtain undue benefits in various forms, such as calling, receiving, offering, or giving of property, or any other benefit with Government officials or any other person doing business with the Company.
- When seeing an action that is considered fraud or corrupt in relation to the Company, do not ignore or dismiss it. It is the responsibility of the employees to notify the supervisor or responsible person and cooperate in the investigation of various facts where the Company will provide fairness and protection those who reject fraud and corruption or notify the Company about fraud and corruption as specified in the Whistleblowing or Complaint Policy or those who cooperate in reporting fraud and corruption.

3. Conflicts of Interest

The Company is committed to conducting business that benefits the Company and overall stakeholders through transparent and verifiable management, and it shall be regarded as the duty of the Company's directors, subcommittees, executives, and employees at all levels to avoid engaging in conflicts of interest that will result in the Company losing benefits if the said transaction cannot be avoided. The responsible agency will handle the transaction in such a way that it is transparent, clear, and in the best interests of the Company.

In this regard, if such transaction meets the criteria for connected transactions as defined by the Securities and Exchange Commission's ("SEC") notification, the Company will comply with the rules and procedures outlined in such notifications without delay by strictly adhering to the guidelines outlined below.

- Avoid taking any action that would give oneself a stake in or a conflict of interest in the Company, whether as a result of contact with a person involved in the Company's trade or as a result of taking the opportunity or information obtained from the performance of duties in the pursuit of personal benefits and doing business that competes with the Company.
- If a transaction with the Company is required, it must be done as if it were a transaction with a third party, with general trading conditions similar to those done with general trading partners, and persons with interests or conflicts must not participate in the approval process.
- Business transactions must be conducted honestly, reasonably, and in the best interests of the Company.
- To avoid conflicts of interest, the Board of Directors, Subcommittees, executives, and related persons must report their interests annually and quarterly if there are changes.

4. The Use of Internal Information and Confidentiality

The Company recognizes the significance of internal information or any substantial news that impacts the movement of securities prices that has not been revealed to the public as secret information of the Company. Subcommittees, executives, and employees must keep internal information confidential and must not share the internal information that he or she knows in the performance of his or her duties with others, or use the internal information to seek profit or benefit from illegal securities trading, or cause the Company to lose benefits, whether directly or indirectly, by adhering to the following guidelines.

- 4.1 Director, Subcommittees, executives and employees at all levels, including spouses and minor children of such individuals, should engage in securities trading in accordance with best practices, avoiding the use of internal information that has not yet been disclosed to the public. This is in accordance with the Company's securities holding reporting policy and the use of the internal information solely for the purpose of ensuring equality among all shareholders and investors and preventing any wrongdoing.
- Directors and executives as defined by the SEC, include employee who know internal information of the Company are responsible for reporting securities holdings and changes in the Company's securities holdings in accordance with the SEC Office's rules.
 - Directors, executives as defined by the SEC and employees who know the internal information of the Company are prohibited from trading in the Company's securities during the 30 days preceding the disclosure of the Company's quarterly and annual financial statements, and within 24 hours after the disclosure of such financial statements, and at other times that the Company shall determine from time to time.

- Director, Sub-committees, executives, employees at all levels, and related persons does not use internal information for their own benefit, including trading or soliciting others to buy, sell, or offer to buy, sell the Company's securities, as well as providing inside information that has not yet been disclosed to the public to others for the purpose of trading in the Company's shares.

4.2 Director, Subcommittees, executives, and employees must understand the necessity of keeping confidential Company information that has not yet been revealed to the public or that may affect business operations or the price of the Company's securities.

- Must keep information and documents that cannot be divulged and/or are trade secrets or Company business secrets confidential.
- Do not use the opportunity or information received as a director of the Company, Subcommittees, executives, or employees to seek benefits for themselves or to operate business that competes with the Company.
- Do not use confidential or internal corporate information that they have learned in the course of their work to benefit themselves or others, either directly or indirectly.

5. Respect for human rights

The Company upholds and complies with human rights standards on a national and international level by treating all stakeholders equally and without discrimination based on variations in personal characteristics. There is no discrimination based on race, color, national origin, religion, sex, age, or any disability that is unrelated to the operation, and the Company's personnel are prohibited from acting in or being complicit in human rights abuses by adhering to the following rules.

- There will be no action or support for any firm that breaches human rights.
- Employees shall be provided with knowledge and comprehension of human rights principles as part of their operations.
- There are no restrictions on independence or diversity of opinion, regardless of gender, nationality, religion, politics, or any other factor. Comments that are likely to generate dispute or division should be avoided.
- The Company will maintain personal information of persons related to the Company and will not commit an infringement by disclosing personal information of any person to the public unless such person consents.
- Establish avenues of contact via which employees whose rights have been infringed or who have been treated unfairly can lodge a complaint with the Company.

6. Intellectual Property

Intellectual property is a valuable asset that can help the Company gain a competitive advantage. As a result, the Company's Board of Directors, Sub-committees, executives, and employees are responsible for protecting, maintaining, and preserving the Company's intellectual property rights and exercising those rights responsibly, as well as not violating or exploiting the intellectual property rights of others by following the principles outlined below.

- The Company does not let other parties to use the Company's trademarks without permission from the Company or in accordance with the terms of the Company's trade contract
- The Company must operate in conformity with the law as well as contractual duties pertaining to legal intellectual property rights, patents, copyrights, trade secrets, and other proprietary information.
- Others' intellectual property rights must be respected. Without the consent of the owner of the intellectual property rights, do not take someone else's work and use it for personal gain.
- The outcomes of the performance of duties are regarded the Company's intellectual property, and upon retirement from employment, the employee is required to return such intellectual property to the Company.
- Users of the firm's computers must only use computer programs that have been appropriately licensed by the Company in order to avoid copyright and intellectual property infringement issues.

7. Safety, Occupational Health and Work Environment

The Company places a high value on quality, safety, occupational health, and a safe working environment by focusing on the operation of the business in accordance with the Occupational Health Management System Standards and safety that is also appropriate to the changing circumstances of the organization, as well as striving to develop management to be more efficient by adhering to the following guidelines.

- Director, Sub-committees, executives and employees must closely adhere to and operate in accordance with the law, policies, requirements, and standards of quality, safety, occupational health, and the environment.
- The Company will make every effort to regulate, monitor, and avoid any type of loss caused by an accident, fire, injury, or occupational illness, loss or damage to property security, wrong operation, and other faults, as well as ensuring a safe working environment.
- Provide public relations and communication to create knowledge and understanding and disseminate knowledge to employees workers to know and understand the rules, procedures,

and procedures, as well as various precautions regarding safety, occupational health, and the environment, and to properly implement it without causing harm to health, property, or the environment.

- When emergencies occur, provide testing and practice methods, review and update procedures on a regular basis.
- Provide adequate resources for operations including safety, occupational hygiene, and the environment.

Section 2: Responsibility to Stakeholders

The Board of Directors values and respects the rights of all stakeholders involved in the operation of all business groups, including shareholders, investors, analysts, customers, employees, business partners, competitors, payables, communities, society, and the environment, and treats all groups of stakeholders fairly in accordance with the following guidelines:

1. **Code of Conduct for the Company**
 - 1.1 Carry out responsibilities to the best of your ability while maintaining accuracy, honesty, and putting the interests of the company first.
 - 1.2 Carry out responsibilities by utilizing knowledge, talents, experience, and skills, as well as developing and upgrading techniques, working more effectively and keeping abreast of business events and movements.
 - 1.3 Maintain the principles of justice and equity, avoid engaging in connected transactions that may result in conflicts of interest with the Company and its subsidiaries (if any), comply closely with the Company's related parties transaction measures and processes, and Sub-committees, executives, or workers with a conflict of interest must not be involved in the approval of such connected transaction.
 - 1.4 Strictly adhere to the company's restrictions on the use of inside information. Do not use the opportunity or information obtained as a director of the Company, Sub-committees, executives, or employees for personal gain or to undertake competitive business or business connected to the Company and its subsidiaries. (if any)
 - 1.5 Maintain the company's confidential information, monitor, take care, and be cautious not to let the documents, Company's confidential information and subsidiaries (if any) publish to outsiders both directly and indirectly, which may cause damage or damage the company's and its subsidiaries' reputations (if any)

- 1.6 The Company's directors and executives are responsible for reporting stock trading and securities holdings to the SEC whenever there is a change, as well as reporting their interests by preparing a report on the interests of the Company's directors and executives every year, which includes strictly adhering to the rules for using internal information.
- 1.7 Use and preserve the Company's assets to maximize advantage and avoid using the Company's assets for personal gain.
- 1.8 Be aware of the importance of preserving the Company's interest and its subsidiaries (if any)
- 1.9 Comply strictly with the Company's and its subsidiaries' rules, regulations and restrictions (if any).

2. Code of conduct for supervisors subordinate and co-workers

- 2.1 Supervisors should utilize moral principles in personnel management and listen to their subordinates' and coworkers' ideas.
- 2.2 Supervisors should develop their subordinates by encouraging them to participate in training at all levels in order to give them with knowledge, abilities, and expertise to improve work efficiency.
- 2.3 Supervisors are responsible for creating and maintaining a safe working environment as well as convenience for life and property.
- 2.4 Supervisors should treat employees with equality, equality, and fairness in terms of salary, welfare, quality of life, and safety.
- 2.5 The supervisor should think about justice in the appointment and transfer. Employees must be rewarded and punished in good faith and based on their knowledge, skill, and suitability. If employee illegal supervisor will proceed according to the rules of the company
- 2.6 Subordinates must respect their superiors and rigorously follow their commands and suggestions. If there is an urgent issue, problems or items that may cause damage to the company, they must be reported to the supervisor as soon as possible to avoid further damage.

3. Code of Conduct for Shareholders, Investors and Analysts

- 3.1 Conduct business in an honest, transparent, and fair manner. Must exercise prudence and caution while considering the best interests of shareholders.
- 3.2 Committed to generating quality and consistent growth for the Company's long-term success and to increasing shareholder interests and confidence.

- 3.3 Respect shareholders' right to equal access to relevant information and disclose important Company information, including financial and non-financial, in an accurate, comprehensive, timely, and transparent manner through easily accessible means.
- 3.4 Not acting in a way that could lead to a conflict of interest.
- 3.5 Do not exploit internal information to gain advantages for yourself or your pals, and do not reveal secret information to others.
- 3.6 Report on both financial and non-financial performance, including crucial shareholder information that is accurate, consistent, and thorough in order to be truthful.
- 3.7 Allow shareholders to submit items for inclusion on meeting agendas or nominate a person who is regarded appropriate to be considered for appointment as a director of the Company in accordance with the regulations established by the Company.
- 3.8 Establish an investor relations section to give information, respond to enquiries, and receive shareholder comments.
4. **Code of conduct for employees**
 - 4.1 Comply with employee-related laws and regulations and values relating to fundamental human rights without regard to ethnicity, religion, gender, age, color, disability, educational position, or any other status that is not directly linked to the operation, as well as respect for uniqueness and human dignity.
 - 4.2 Recruit and choose personnel on the basis of equality, taking into account candidates who have the necessary knowledge, abilities, experience, and morals for the role, as well as an attitude that is consistent with corporate values.
 - 4.3 Determine an appropriate reward structure based on knowledge and talents, responsibilities in the position, equal to the same industry, and in accordance with economic conditions as well as the company's short-term and long-term performance.
 - 4.4 Employee advancement should be compensated fairly. It is evaluated based on the quality and success of the task, as well as the employees' attitude and potential.
 - 4.5 As required by legislation, provide numerous welfare services and, if necessary, offer more welfare
 - 4.6 Appointment, transfer, and rewarding shall be done on an equal footing. Employees' knowledge, abilities, and suitability are based on their knowledge, abilities, and suitability. Employees are also subjected to appropriate punishments once an employee violates the law.
 - 4.7 Encourage employees at all levels to undergo training on topics that are relevant to their jobs to boost work efficiency.

- 4.8 Take care of and maintain the working environment so that it is safe for the employees' lives and property.
- 4.9 Employees at all levels should be encouraged to make comments and suggestions. There is a channel for employees to report items that imply an offense against or are contradictory to work regulations, rules, regulations, instructions, announcements, or legislation.
- 5. Code of conduct towards customers**
- 5.1 Committed to developing and delivering high-quality services to satisfy customers' needs with safety and in line with the established standards at a fair price and capable of completing the task within the time frame set for optimal client satisfaction.
- 5.2 Comply strictly with the terms and conditions of trade as well as maintaining consumer confidentiality and do not use trade secrets for personal gain or for the advantage of those involved. In the unlikely case that this is not achievable, customers must be notified in advance, and a solution to the problem must be found as soon as possible.
- 5.3 Customers should not be taken advantage of, and unjust trading conditions should not be imposed.
- 5.4 On a regular basis, listen to customer feedback or ideas and make fixes to various bugs to improve service quality.
- 6. Code of conduct towards business partners**
- 6.1 Strictly adhere to the Company's procurement guidelines and processes. The Company and its subsidiaries (if any) have clearly defined criteria for selecting business partners and a partner registration system to ensure fairness in the transparent procurement process. Additionally, there are procedures that can be examined.
- 6.2 Procurement negotiations must be transparent. There is an accountable pricing comparison.
- 6.3 In trade transactions with trading partners, do not demand, receive, or pay any perks that are dishonest or in excess of customary trading.
- 6.4 Comply with the conditions set forth for the trade partners and follow trade agreements with trade partners, particularly in terms of payment for products and services.
- 7. Code of conduct towards competitors**
- 7.1 To encourage trade competition collaboration for the advantage of customers while adhering to the framework of free and fair competition.
- 7.2 Do not seek confidential information from competitors using dishonest or unethical means, and do not reveal or fail to disclose the Company's secret to competitors.

- 7.3 Make no malicious charges or use any other improper approach to attack and harm the reputation of competitors.
- 7.4 Ignore bullying or causing competitors to miss out on equal opportunity.
- 8. **Code of conduct towards payables**
 - 8.1 Maintain and strictly adhere to all contracts, agreements, loan terms, and guarantee conditions with payables, both in terms of repayment and collateral care.
 - 8.2 Repay the principal and interest on schedule and in full.
 - 8.3 If the contract's requirements cannot be met, payables must be notified as soon as possible so that they can work together to identify solutions.
 - 8.4 Financial condition report to payables in accordance with the loan agreement, correctly, thoroughly, and without altering the facts
- 9. **Code of conduct towards society, environment and community**
 - 9.1 Carry out their responsibilities and live with a clear conscience toward society, the environment, and the community at all times.
 - 9.2 Supervisors and subordinates collaborate to plan and carry out activities or initiatives that benefit society, the environment, and the community.
 - 9.3 Set a good example in terms of natural resource and environmental conservation and encourage the efficient use of natural resources.
 - 9.4 Always handle business in a way that considers the public's interests.

Section 3: Ethics and Business Conduct Management

- 1. **Managing and Maintaining the Code of Conduct**
 - 1.1 Director Subcommittees, executives, and all workers of the Company have tasks and responsibilities that must be understood. They must completely adhere to the regulations outlined in this Code of Conduct and cannot claim ignorance of the established guidelines.
 - 1.2 Executives and supervisors at all levels must be good role models for ethical behaviors, and it is their responsibility to supervise and encourage personnel in their own chain of command to know, understand, and follow this Code of Conduct.
 - 1.3 The Company does not desire to engage in any unlawful or unethical behavior. If the Company's Directors, Sub-committees, executives, and employees commit illegal acts or violate set ethics, they will face severe disciplinary action, and if an action is suspected of being against the law,

rules, regulations, and regulations of the government sector, the Company will immediately refer the matter to government officials for further action.

- 1.4 Director Subcommittees, executives, and workers are required to report practices that may be in violation of the Code of Conduct. In the event that you see, are pressured, or are forced to do anything that is contrary to business ethics, report concerns and whistleblowing through the procedures specified in the Company's Whistleblowing or Complaints Policy.
- 1.5 When requested by the authorities involved in the inquiry, directors, subcommittees, executives, and employees are obligated to cooperate in the investigative process.

2. Disciplinary action

- 2.1 The sanctions will be determined by the Company to suit the nature and circumstances of each sort of Code of Conduct violation, with the severity of the penalties varying according to the severity of the offense.
- 2.2 If it is an act that breaches the ethics and code of conduct for the first time, the corporation will be held accountable. First, a warning letter will be given. Each supervisor will prepare a summary of the results and sanctions for the Chairman of the Board of Directors and/or the Chief Executive Officer's approval.
- 2.3 If a substantial breach of the Code is committed, violators may face harsh penalties ranging from
 - (1) Suspension from work without salary
 - (2) dismissal
 - (3) prosecute both civil and criminalThe management representatives present will summarize the results and penalties for approval by the Chairman of the Board of Directors and/or the Chief Executive Officer.

3. Measures to protect complainants

- 3.1 The information and name of the individual reporting the complainant or collaborating in reporting infractions or noncompliance with the Code of Conduct and Ethics will be kept confidential by the Company.
- 3.2 The Company will share information only to the extent necessary, taking into account the safety and well-being of the person reporting the source of the information or the person in question.
- 3.3 Those who have been harmed shall have their losses minimized through proper and fair methods.

Approved by the resolution of the Board of Directors Meeting No. 4/2019 held on August 9, 2019.

This will come into effect from 9 August 2019 onwards.

Signature

(Mr. Witoon Jeakjerm)

Chairman of the Board

Teeka Construction Public Company Limited