




APPLIED DB PUBLIC COMPANY LIMITED

A vertical dark blue bar on the left side of the page. A horizontal blue arrow points to the right, overlapping the vertical bar. In the bottom-left corner, there are several thin, curved lines in shades of blue and grey, resembling stylized grass or reeds.

# Code of Ethics and Rules of Conduct

	<p style="text-align: center;"><b>Type of Document : Policy</b></p> <p>Subject : Code of Ethics and Rules of Conduct</p>	<p style="text-align: center;"><b>Document No.</b></p> <p style="text-align: center;">IA<sub>1</sub>-ADB-02</p>	<p style="text-align: center;"><b>Effective Date</b></p> <p style="text-align: center;">10 November 2025</p>	<p style="text-align: center;"><b>Edited</b></p> <p style="text-align: center;">06</p>	<p style="text-align: center;"><b>Page</b></p> <p style="text-align: center;">1</p>
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## Code of Ethics and Rules of Conduct

Applied DB Public Company Limited and its subsidiaries give importance to conducting business along with conducting oneself in accordance with the principles of good governance, which is considered a tool to enhance the transparency of the Company's operations, which will create confidence and credibility from all stakeholders. Therefore, the Company has prepared a code of ethics and work practices in writing so that directors, executives, and employees at all levels of the Company and its subsidiaries are aware of and understand the ethical principles that the Company uses in conducting business and adhere to them as guidelines for working in accordance with the same standards throughout the organization, including setting measures to supervise and monitor everyone's compliance with the practices in the code of ethics, along with setting penalties if any actions that violate the ethical principles occur.

However, this Code of Ethics and Working Practices is reviewed annually or as appropriate to suit the business situation and environment that may change with the times. The contents have been filtered by the Executive Committee and submitted to the Board of Directors for approval and announced to all relevant parties.

### **Vision**

The company aims to be a leader in the country's production and distribution of high-quality PVC Compound products, ensuring product safety and compliance with the law. With globally standardized management and production process, it seeks to contribute positively to the economy, society, and the environment, aiming to establish enduring partnerships, trust, and provide consistent and sustainable customer satisfaction responses.

### **Mission**

- 1) Consistently deliver superior quality PVC Compound products that meet the diverse needs of our customers. We are committed to upholding the highest standards of product safety and regulatory compliance, ensuring that our products are not only reliable but also environmentally sustainable.
- 2) We strive to achieve operational excellence through globally standardized management and production processes, leveraging the latest technologies and best practices. By doing so, we aim to contribute positively to the economy, society, and the environment.
- 3) Building enduring partnerships with our stakeholders is a core of our mission. We seek to establish trust and foster long-term relationships with our customers, suppliers, employees, and the communities in which we operate. Through continuous innovation, superior customer service, and a relentless pursuit of customer satisfaction, we aim to exceed expectations and become the preferred choice in the industry.

### **Values and culture of the organization**

The company emphasizes the value of working with honesty towards the organization, customers and society. Teamwork involves helping, promoting and supporting each other, while respecting each other at any level of the organization. We try to instill these attitudes in our employees and stakeholders at all levels.

## ADB Value and Culture



### 1) Integrity and Practical

The Company is committed to conducting business with honesty, integrity, ethics, and adheres firmly to the principle of equality in providing services. It does not assist or condone violations of laws, regulations, ordinances, or business ethics. It does what is right and performs its duties with honesty, integrity, seriousness, and straightforwardness under relevant laws and regulations. It adheres to ethics and business ethics and takes into account risks that affect the organization.

The company's personnel must behave honestly, adhere to standards in their work, including providing services to customers, always and consistently, honestly, without pretense or boasting, and without easily making promises to customers (including internally). Compete in business fully within the bounds of the law, respect rights and intellectual property, select suppliers without bias, with transparency, honesty and fairness, and without corruption and faction division within the organization.

### 2) Customer Priority


Customers are the key factor that makes a business survive and the only purpose of a business is to create and maintain customers. The focus on customers will not be limited to real customers or external customers who buy products or services of the business only, but will expand to cover employees or departments next to us who are waiting to receive products or services from us, called internal customers. Focus on customers as the main factor and be able to meet the needs of customers in terms of both quality and service. The organization must rely on customers. Therefore, the organization must understand the needs of customers, both present and future, and must try to achieve the needs of customers, including trying to exceed the expectations of customers.

### 3) Innovation

Create something new with new thinking, new attitude, new process. These are called "Innovation" in terms of products, processes/methods of work, management, and other aspects such as places and facilities.

### 4) Excellent Driven

Aiming for excellence in management, business benchmarking, situations, knowledge for modern management and administration reform, new organizational and management structures, and various job positions, duties and responsibilities.

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## 5) Win-win Orientation

The win-win thinking benefits all parties can be achieved by leaders, supervisors, supervisors or those in charge at high levels at various levels must be open-minded and open to negotiations all the time.

- Investors and shareholders have more value in their investment.
- Employees receive compensation, welfare, environment and stability. Employees work to their full potential, honest and be part of the company in the long run.
- Respond to customer satisfaction, work together throughout the supply chain
- Treat society and the environment responsibly.

### Think Win/Win

- Collaborate with stakeholders to achieve mutual benefits for all parties.

## Business guideline

The Company operates its business on the basis of good corporate governance principles to ensure transparency, adequate standards and international competitiveness for sustainable business growth, shareholders receive satisfactory returns and employees and staff have appropriate employment conditions.

### 1. Objective

This Code of Ethics and Work Practices has been revised to be used as a guideline for executives and personnel of Applied DB Public Company Limited and its subsidiaries. It has set the principles of conduct as guidelines for employees' behavior in various aspects for performing their assigned duties. It aims to enable the Company to conduct its business efficiently for the Company's good reputation, which will be trusted by customers, partners, shareholders, investors, and various stakeholders. Most importantly, the Company can maintain its transparency, fairness, equal treatment, honesty, and morality according to the principles that the organization should have, and help maintain its good reputation and employee pride, which will lead to an organization with a good governance system and sustainable business management.

The Company has consistently presented and communicated the Code of Conduct in accordance with this manual to employees for use as a guideline in their work.

### 2. Scope


This Code of Ethics and Working Practices applies to all directors, executives and employees of Applied DB Public Company Limited and its subsidiaries, hereinafter collectively referred to in this document as the "Company".

### 3. Business ethics

The company is committed to conducting business responsibly, under the framework of morality and ethics, and to ensure that the work of all levels of personnel meets the same standards. Therefore, a code of ethics and work practices have been established for everyone to adhere to and strictly comply with.

#### 3.1 Director Code of Ethics

- 1) Perform duties in accordance with the law, the objectives and regulations of the Company, as well as the resolutions of the shareholders' meeting and the resolutions of the various committees.
- 2) Perform duties for the benefit of the Company, shareholders and other stakeholders and maintain the image of the Company.
- 3) Perform duties with honesty, caution, prudence, transparency and fairness.
- 4) Manage the business by avoiding actions that may cause conflicts of interest with the Company directly or indirectly.

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- 5) Must not have any interest or must not perform any actions that are in the nature of management or administration that undermines the benefits of the Company or provides benefits to other persons or other businesses.
- 6) Act as a good example for employees in complying with the code of conduct and corporate governance policy, including resisting corruption, and being committed to preventing and eliminating actions that lead to corruption.
- 7) Must be independent in making decisions and operate on the basis of correctness.
- 8) Do not use one's authority or information obtained from performing duties to seek benefits for oneself or others improperly, including not performing any unfair actions regarding the trading of the Company's securities.
- 9) Perform duties in accordance with the laws, rules, regulations, regulations and announcements related to business operations.

### 3.2 Executive Code of Ethics

- 1) Perform duties with honesty, integrity and fairness for the maximum benefit of the Company, customers, business partners, shareholders and employees.
- 2) Comply with laws, rules and regulations of the Company.
- 3) Strictly comply with the policies and operating conditions announced by the Company.
- 4) Disclose the true status of the Company to the directors and shareholders in a complete and timely manner.
- 5) Do not seek benefits for oneself and related persons from the position and information that is the Company's trade secret.
- 6) Do not conduct business or work in any other business that competes with the Company.
- 7) Any operations are under the authorized approval authority.
- 8) Behave within the framework of good morals and traditions, be a leader and a good example to subordinates.
- 9) Compete with others or competitors under good practices, without
- 10) Be a good example in resisting corruption and committed to preventing and eliminating actions that may lead to corruption.
- 11) Position oneself appropriately as a representative of the organization to external parties.

### 3.3 Employee ethics

- 1) Strictly comply with laws, regulations, rules and company's announcements.
- 2) Perform duties with honesty, integrity, caution, and ethics in performing duties, avoiding actions that may lead to corruption.
- 3) Perform duties in accordance with the company's policies and regulations related to the scope of treatment of stakeholders correctly and strictly.
- 4) Have a good attitude towards the company and supervisors.
- 5) Perform duties with honesty, integrity, morality, diligence, and develop oneself to be knowledgeable and advance in one's work at all times.
- 6) Perform duties with full knowledge and ability and up to the standards that one should have in one's position with care and responsibility.
- 7) Treat colleagues with good manners, friendliness, sincerity, and unity among the group, helping each other in the right way and for the benefit of the company and various departments/divisions in the company.
- 8) Be a person who is eager to learn and listens to others' opinions, determined to develop and improve oneself in order to improve the work that one is responsible for to be efficient at all times.

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- 9) Keep the company's secrets, customer information, and the company's business secrets from being leaked to unrelated persons. Even after terminating the duties with the Company
- 10) Do not use inside information obtained from performing duties to seek benefits for oneself and others improperly, including not committing any unfair acts regarding the trading of the Company's securities.
- 11) Avoid any actions or expressing opinions to outsiders, the media or various social media that may affect the reputation and image of the Company.
- 12) Use the Company's assets for the maximum benefit of the Company
- 13) Compete with others or competitors under good practices,
- 14) Do not commit any corrupt acts against the organization and are committed to opposing any actions that will lead to corruption and corruption within the organization.
- 15) Dedicate yourself to participating in public activities, both within the organization and society and the community as appropriate opportunities.

#### 4. Ethics and Treatment to stakeholders


The Company will treat all stakeholders honestly, fairly and equally without discrimination under good corporate governance, legal regulations, rules, regulations, traditions and good morals, including ensuring that cooperation between the Company and stakeholders is promoted to create growth and sustainability of the business.

##### 4.1 Treatment of Shareholders

The Company always remembers that shareholders are the owners of the business and the Company has a duty to create added value for shareholders in the long term. It gives importance to the rights of shareholders to receive correct, complete, sufficient, timely and equal information of the Company to be used in making decisions on all matters of shareholders.

The Company has a duty to promote and facilitate shareholders to exercise their rights according to all laws, as well as to provide other rights even if not specified by law, by following reliable standards and disclosing important information that may affect shareholders by means that are easily accessible. In shareholder meetings, the Company will provide shareholders with an opportunity to ask questions or express additional opinions before voting on each agenda item, by providing relevant persons to answer questions or provide explanations to shareholders. Therefore, the Company has set the following guidelines for shareholders:


- 1) The Company is committed to conducting business with good performance, generating continuous and stable profit growth to enhance competitive potential and create added value for shareholders in the long term.
- 2) Perform duties with honesty and fairness to all shareholders for the greatest benefit of all.
- 3) Manage by applying knowledge and management skills to the fullest extent of their ability in all cases, including making decisions to proceed with transparency, caution and thoroughness.
- 4) The Company will treat all shareholders equally, both in shareholders' meetings, giving shareholders the opportunity to propose agendas and nominating persons to be elected as directors of the Company and other rights that shareholders should receive in accordance with the regulations of the Stock Exchange of Thailand and the Securities and Exchange Commission and related laws.
- 5) Report the Company's financial status, operating results and non-financial information to shareholders equally, consistently and completely according to the truth.
- 6) Do not seek benefits for yourself and those related to you by using any inside information of the Company that has not yet been disclosed to the public, disclosing it to outsiders or taking any action that may cause conflicts of interest with the Company.

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- 7) The Company will perform duties with honesty and fairness, and make decisions to proceed with fairness to major and minor shareholders for the greatest benefit of all shareholders.
- 8) The Company will manage the organization by adhering to morality and ethics, and promoting morality and ethics at all levels of the organization. Monitor and manage conflicts of interest that may arise in the organization.
- 9) Rights to Attend Shareholders' Meetings, The Company promotes and facilitates the participation of all groups of shareholders, including institutional investors, in shareholders' meetings, thereby enabling them to exercise their rights in making decisions on significant matters that may affect or relate to the interests of the Company and its shareholders. To this end, the Company has undertaken various measures to promote and facilitate the exercise of such rights by all groups of shareholders, including institutional investors, in shareholders' meetings, as follows:
  - Determination of the date, time, and venue of the shareholders' meeting: The Company takes into consideration the convenience of shareholders and ensures the availability of adequate personnel. Furthermore, technology is applied to the registration process, vote counting, and presentation of voting results, in order to ensure that the conduct of the meeting is convenient, expeditious, accurate, transparent, and verifiable.
  - Sending the Notice of the Meeting in advance to the Shareholders At the Annual General Shareholders Meeting, the Company has assigned Thailand Securities Depository Company Limited (TSD), as the securities registrar, to send the notice of meeting and related documents to the shareholders, both in Thai and English. The shareholders can use them at the shareholders meeting as supporting information in making vote decisions on various matters. The notice of the meeting will clearly specify meeting agendas and objectives of the meeting for each agenda as well as the Board of Directors' opinions. Related documents such as annual report, financial statements, support document for each agenda and proxy statement (QR Code). The notice of the meeting shall be sent to all shareholders listed in the shareholders' registration book. The notice should be sent on the day the Company announced the closing date of share transfer registration and should be sent 14 days in advance, as well as publish the notice of the meeting along with the mentioned meeting agenda on the Company's website not less than 30 days prior to the meeting. The purpose is to allow the shareholders to study the information before the actual meeting. This also includes continuously advertise the invitation notice on the Newspaper not less than 3 days before the meeting date to inform shareholders to prepare in advance before participating in the meeting, which is in accordance with the Public Limited Companies Act, B.E. 2535 (1992).
  - Actions Undertaken after the Meeting of Shareholders The Company submitted the report of the voting result during the AGM to the Stock Exchange of Thailand (SET) within 1 day since the meeting was adjourned and also submitted the minutes of Annual General Meeting of Shareholders to the Stock Exchange of Thailand within 14 days after the date of the meeting concerned. As well, the video recordings of the meetings are available on the Company's website [www.adb.co.th](http://www.adb.co.th). The purpose was to provide the shareholders with convenient access to the information.

#### 4.2 Treatment of Customers

The Company is committed to creating customer satisfaction by delivering quality products and services that meet customer needs, disclosing complete, accurate, timely and non-distorted information about management, providing communication channels for customers to complain about product quality and unfair management, complying with contracts, agreements or conditions with customers transparently and fairly, consistently

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emphasizing the confidentiality of customers' information and not using such information for the benefit of oneself and/or related persons.


The company realizes the importance of customers, so it has set the following guidelines for its customers:

- 1) The company is committed to developing products and services to be complete, delivering products and services quickly and with quality to continuously meet customers' needs at reasonable prices, in line with their needs, adding value, supporting the participation of stakeholders in the Value Chain, maintaining good relationships with customers, promoting innovation, not limiting customers' rights and having fair trading conditions.
- 2) Establishing a system to control and supervise the production process and delivery of quality products to customers, including giving importance to improving and developing production technology and checking product quality to be up-to-date at all times.
- 3) Establishing a system to supervise and strictly comply with agreements made with customers with honesty, integrity and consistency.
- 4) Establishing a system to maintain customer confidentiality strictly and appropriately, as if it were the company's secret, and not using it for personal or related persons' benefits improperly.
- 5) Not requesting or accepting money, gifts, prizes or other compensation from customers or other persons, except for receiving it due to traditional giving.
- 6) Adhering to and maintaining honesty and integrity as the main principles in conducting business and maintaining customer confidentiality, not using information for personal or related persons' benefits improperly.
- 7) Protecting the utmost benefits of customers is important in order for customers to be satisfied and meet their needs quickly, punctually, with attentive service. Take responsibility and create maximum customer satisfaction by presenting quality and efficient product information.
- 8) Conduct business in accordance with the law and government regulations and will not assist, promote or support any illegal activities and transactions.
- 9) Comply with contracts and agreements made with customers, do not commit any acts that violate and/or breach contracts with customers. If the contract or agreement cannot be complied with, the customer must be notified immediately to jointly find a solution to prevent damage.
- 10) Listen to problems/complaints from customers and take corrective action to ensure that customers receive a quick response, along with evaluating customer satisfaction in order to improve/develop products and services.

#### 4.3 Treatment of trading partners

The company takes into account equality, honesty and mutual benefits with its business partners. Therefore, it has sustainable practices with its business partners, along with supply chain management, so that the company's business partners operate ethically, are socially responsible, respect human rights, take care of occupational health and safety of customers and consumers of its products, and have good environmental management. The guidelines for business partners are as follows:

- 1) Promote good and sustainable relationships between the Company and its business partners to be good, friendly and satisfactory to all parties, leading to quality services that are correct, fast, in line with needs and efficient.
- 2) Refrain from receiving or paying any dishonest benefits in contacting or negotiating business with business partners. Treat business partners transparently, fairly, equally, honestly and do not take advantage of

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business partners, taking into account the maximum benefit of the Company based on receiving fair returns for both parties.

- 3) Establish clear and fair procurement policies in selecting business partners with the potential to conduct sustainable business and strictly comply with contracts/trade terms and conditions agreed upon with business partners. In the event that conditions cannot be complied with, the business partners will be notified immediately to jointly consider and find solutions using the principle of reasonableness.
- 4) Establish policies/guidelines for promoting potential and sustainability with business partners. The Company places importance on building good relationships and jointly developing potential for sustainable supply chain management by effectively communicating with business partners about integrated supply chain management, planning potential development, promoting, supporting and pushing business partners to have good management together in order to achieve the highest efficiency.
- 5) Maintain confidentiality and do not use information for the benefit of oneself or others inappropriately.
- 6) Communicate to business partners about the Company's anti-corruption policy. To achieve common understanding and find common ground to fight corruption and bribery on a wider scale.

#### 4.4 Treatment of creditors

The Company realizes the importance of creditors and has set the following policies for treating creditors:

- 1) Strictly maintain and comply with the conditions agreed upon with creditors, both in terms of repayment, maintenance of collateral and other conditions, including not using the funds obtained from the loan in a manner that conflicts with the objectives of the agreement made with the lender.
- 2) Report the Company's financial status honestly, accurately and on time to creditors regularly.
- 3) Treat trade creditors equally and fairly, based on receiving fair returns for both parties.
- 4) In the event that the obligations under the contract cannot be fulfilled, the creditors must be notified in advance in order to jointly find a solution and prevent any possible damage.


#### 4.5 Treatment of business competitors

Competitors are external individuals or juristic persons with whom the Company must compete under the general procurement process in order to benefit the business. Competition must be fair, without distorting information, deceiving or using any other methods that are not in accordance with good competition practices, and without violating the confidentiality or knowing the trade secrets of competitors through fraud. The Company has set the following practices:

- 1) Conduct business in accordance with the law, compete fairly, and act within the framework of good competition rules equally, without distorting information, deceiving or using any other methods that are not in accordance with good competition practices.
- 2) Do not seek confidential information of competitors through dishonest or inappropriate methods.
- 3) Do not act with the intention of damaging the reputation of competitors by making defamatory accusations, making untrue accusations or performing any unfair competition actions.
- 4) Do not act in a way that infringes on the intellectual property of others or competitors and comply with intellectual property laws.
- 5) Do not prevent others from participating in business competition.

#### 4.6 Treatment of employees

All personnel of the Company are the most important part of the business that the Company must give importance to without discrimination. Promote the Company's personnel to be united, trust each other, not discriminate, treat each other politely, respect human dignity and be proud of the organization. Employees are the


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key to the success and achievement of the Company's valuable goals. The Company will take care of employees fairly in terms of opportunities, compensation, appointment, transfer, potential development, and develop work safety and the environment in the organization to be the best. In order to comply with the said policy, the following principles are in place for employees:

- 1) Arrange a process for considering the recruitment, appointment and transfer of the Company's personnel with honesty and based on the knowledge, ability and suitability of personnel, including termination and punishment of personnel that is transparent, verifiable and conducted with honesty.
- 2) Treat employees politely and respect their individuality.
- 3) Provide fair compensation to employees, including establishing a provident fund for employees and emphasizing employee welfare.
- 4) Establish an employment management system so that employees are protected and treated fairly by setting a human rights policy as a guideline for compliance with the requirements of Thai labor standards and labor laws, including other related regulations.
- 5) The Company has established a personal data protection policy. To protect the personal data and privacy of all personnel of the company
- 6) Maintain a safe working environment for the lives and property of employees
- 7) Promote and give importance to the development of employees' knowledge and abilities by providing opportunities equally and consistently to develop employees' abilities to achieve their potential to work professionally
- 8) Respect the rights and listen to the opinions and suggestions of employees at all levels equally and without interference
- 9) Strictly comply with laws and regulations regarding labor laws and employee welfare

#### **4.7 Treatment of the community, society and the environment**

- 1) Conduct business responsibly, adhering to moral principles and ethics, taking into account negative impacts on communities, society and the environment throughout the supply chain.
- 2) Provide products and promote the development of environmentally friendly innovations, including supporting and promoting business partners to produce products and services that reduce resource usage and are environmentally friendly.
- 3) Focus on operating businesses sustainably, with responsibility towards communities, society and the environment, both in terms of improving quality of life, safety and natural resource use, including caring for the interests of stakeholders.
- 4) Promote organizations to have a sense of responsibility towards society, communities and the environment, cooperate with entrepreneurs in the industrial area and communities to provide facts about operations and cooperate with investors, shareholders and interested parties.
- 5) Promote projects or activities for society and the environment consistently, activities that truly create benefits for communities and society, using the company's resources efficiently and cost-effectively, and communicating and publicizing projects or activities for society and the environment to stakeholders.
- 6) Campaign for the efficient use of resources and promote energy conservation for the benefit of the public.
- 7) Do not perform any actions that have a negative impact on natural resources and the environment beyond what is required by law.
- 8) Provide channels for complaints, grievances and suggestions that may affect the community. Society and Environment

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- 9) Report the results of the operations in terms of community, social and environmental responsibility to stakeholders in the annual information form/annual report (Form 56-1 One Report).

## 5. Ethics and practices of the company

### 5.1 Compliance with the Company's laws and regulations

#### 1) Compliance with the law

In conducting the Company's business, including directors and executives and in performing the duties of employees, employees must comply with the law, not do anything that will be a risk of illegal actions, including regulations issued by relevant officials, such as:

- The Company's personnel must work in accordance with the principles of the law, regulations, rules, requirements and policies of the Company, including performing any work in accordance with the principles of good corporate governance, risk management and internal control to create a good work culture of the Company.
- The Company's personnel must thoroughly understand the laws directly related to their duties and responsibilities and strictly comply with them. If unsure, seek advice from the internal control unit or the unit directly responsible.
- The Company has compiled the laws, rules and regulations of the program into categories for the Company's personnel to study and provide training and support in legal knowledge and understanding to the Company's personnel appropriately.


#### 2) Work regulations and related rules and orders

In addition to complying with general laws, which are basic duties that the company, employees and staff must comply with without any action that would violate any laws, the company has work regulations, including rules and orders that are currently in effect or may be announced in the future. Employees and staff must comply with them. The human resources department or internal audit and control unit and/or other relevant units have the duty to inform the announcement, revise, improve and provide knowledge and understanding to employees and staff so that they are aware of the duties that must be performed and have a correct understanding.

### 5.2 Treatment of Company Assets

All executives and employees of the Company are responsible for using the Company's assets in a cost-effective, economical and most beneficial way. All executives and employees must take care not to cause damage to such assets, as follows:

- 1) Maintaining the Company's resources: All personnel are responsible for maintaining the safety and security of the Company's resources and are strictly prohibited from using the Company's resources illegally or inappropriately. The term "resources" includes tangible and intangible assets, including equipment and tools used in operations, intellectual property and trade secrets.
- 2) All personnel of the Company are responsible for maintaining all information and records that they maintain, collect, use or obtain from their work, including ledgers, inventory accounts, records, daily reports, cash and various assets, to be correct and complete, and to be able to show the Company's business transactions and processes appropriately, accurately and in accordance with accounting standards and applicable practices.
- 3) All funds and assets of the Company must not be disclosed or documented. False or incorrect entries or records must not be recorded in the ledger, daily reports, financial statements, other documents or intentionally conceal any transactions.

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- 4) Transactions related to business operations must be accompanied by correct supporting documents attached to the safekeeping set.

### 5.3 Intellectual property and use of information technology


The Company encourages its personnel to study, invent, develop and create work value that will benefit the Company by using information resources and technology and must be more careful in accessing and respecting the copyrights and intellectual property of others. The Company has established the following work practices related to the use of intellectual property and information technology:

- 1) In addition to taking care of the use of the Company's assets to the greatest extent possible, the Company's personnel must also respect intellectual property rights and not violate the intellectual property of others by maintaining the highest standards of intellectual property protection in both work and business operations.
- 2) All executives and employees must use computer equipment, information contained in the computer system, including other communication tools of the Company with caution and prudence, taking into account the Company's interests as the main consideration.
- 3) The Information Technology Department is responsible for protecting the Company's right to inspect information in the system as appropriate.
- 4) All executives and employees must avoid accessing websites with illegal content or content that violates the morality of society and must prevent the dissemination of information from such websites to other persons, both inside and outside the Company.
- 5) All executives and employees are prohibited from forwarding messages via the Internet or other forms of communication that cause damage, destroy reputation, disturb others or otherwise act inappropriately toward others.
- 6) Executives and employees who are not assigned by the Company are prohibited from Access, copy, publish, delete, destroy, modify any information, change passwords or do anything that causes damage to the Company.
- 7) All executives and employees are prohibited from using illegal software.
- 8) The Company's personnel must keep their passwords confidential and not tell other people to prevent other people from accessing their passwords, including strictly complying with information security regulations and information-related work practices.

### 5.4 Not giving or requesting or accepting any bribes, rewards or compensation.

In addition to what is specified in the Anti-Corruption Policy, the Company has additional policies on the following matters, as detailed below:

- 1) Executives and employees are prohibited from requesting or receiving any benefits or entertainment in an unusual manner from any partner with whom the Company does business.
- 2) All executives and employees are prohibited from offering any benefits to outsiders in order to induce them to act improperly.
- 3) All executives and employees must avoid offering or receiving any rewards or gifts from any person doing business with the Company, unless it is given or received on a special personal occasion, such as illness or childbirth, and the value is appropriate. Such giving or receiving shall not be related to business cooperation.
- 4) If executives and employees receive gifts in the form of money or items that the Company considers to be of high value, they must notify their supervisors in order of rank.


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## 5.5 Use of inside information and confidentiality

Confidential information is considered non-public information. If disclosed to the public or in the hands of competitors, it will have a serious impact on the Company. In addition to inside information that affects the value of shares traded on the Stock Exchange, it also includes all types of information that partners and customers have trusted to the Company. The Company has a duty to keep such information confidential and only those who directly perform their duties or have the right to access important information of the Company are aware of it.

In addition to what is stated in the Inside Information Use Policy, the Company has set additional policies on the use of inside information of the Company for directors, executives and employees, with the following details:

- 1) The Company has specified the level of confidentiality of information and methods that directors, executives and employees must understand about the level of confidentiality of information and guidelines for maintaining confidentiality. The Company's personnel must maintain confidentiality in the work they are responsible for so that the secret does not fall to persons outside the Company or unrelated personnel of the Company.
- 2) Directors, executives and employees of the Company and its subsidiaries are prohibited from using inside information of the Company to seek benefits in buying or selling the Company's shares or providing such information to other persons in order to buy or sell the Company's shares.
- 3) The Company's inside information is prohibited from seeking benefits, whether for personal use or for any person.
- 4) It is strictly prohibited to disclose the Company's trade secrets to any third party, especially to the Company's business competitors.
- 5) The Company's trade secrets are prohibited from being disclosed. To other persons, especially to the Company's competitors.
- 6) The Company has established measures to prevent the exchange of internal information of the Company to related persons, including Directors, Executives and Employees in related departments (including spouses and minor children). The Company has a policy to prohibit related persons from trading in the Company's securities for 30 days prior to the disclosure of quarterly and annual financial statements and within 24 hours after the disclosure of such financial information.
- 7) In hiring a person who has worked with a trade competitor or the government sector before, the Company must search for and study the relevant laws, as well as the confidentiality agreements that such person has made with a trade competitor or the government sector before, and must not take any action to cause such person to do anything that is a breach of the agreement with a trade competitor or the government sector, which will result in subsequent lawsuits. In addition, such hiring must not violate or contradict the relevant laws.
- 8) In the event that related persons have access to non-public information that affects the price of the Company's securities, these persons will be prohibited from trading securities after such information has been disclosed to the public for a period of 24 hours. The executives or related departments that have access to non-public information must not disclose such information to third parties or other related persons or use the information incorrectly.
- 9) When Directors, Executives, and Persons designated by the Company (including their spouses and minor children) engage in the buying or selling of the Company's securities, they must report any changes in their securities holdings in accordance with Section 59 of the Securities and Exchange Act B.E. 2535 (1992) within three business days from the date of purchase, sale, transfer, or receipt of transfer of the Company's

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securities. (Further details can be found in the Policy on the Use of Inside Information and Securities Trading by Directors, Executives, and Employees of the Company (IA1-ADB-06)).


#### 5.6 Conducting business with transparency and honesty and resisting corruption.

The Company adheres to the principles of good corporate governance, which emphasizes on conducting business transparently, honestly, and being auditable, acting equally and conducting business in accordance with good practices in order to be in accordance with the morality of business partners, customers and other persons who contact the Company. The Company will proceed in accordance with all legal procedures, including disclosing important information to the public in a manner that is easily accessible. When conducting business with partners and external persons, the Company's personnel must comply with the Code of Conduct while conducting business with customers, vendors, partners or external persons who are involved in the business (hereinafter collectively referred to as "partners"). All personnel of the Company must comply with the following guidelines:

- 1) Comply with rules, business practices and business etiquette while dealing with partners. The term "benefits" as defined in this Code of Conduct means anything that has value, including compensation in the form of money, gifts, brokerage fees, positions, services, discounts or shares, regardless of the form or name. "Benefits" do not include general social practices that are appropriate for the occasion and do not affect any specific rights.
- 2) While performing duties, one must not receive, give or demand any improper benefits, whether in one's own name or in another's name, or act in any manner that violates honesty, is unlawful or violates the assigned duties (hereinafter referred to as "Behaviors suggesting dishonesty")
- 3) Must maintain the following practices when receiving valuable benefits or gifts and others while performing duties provided by external parties related to business, as follows:
  - 3.1) Do not accept any benefits or gifts if receiving such benefits or requesting such gifts may affect the performance of duties or be a case of conflict of interest with the Company.
  - 3.2) Receiving such benefits or gifts must comply with the laws and regulations stipulated by the establishment.
  - 3.3) Receiving such benefits or gifts must be under local etiquette, following business customs while traveling domestically or abroad, receiving guests or visitors, promoting, supporting and contacting and coordinating business as part of business etiquette.
  - 3.4) Receiving such benefits or gifts must be in accordance with general social practices, with the purpose or strengthening business relationships to join or invite other people to join normal social activities.
  - 3.5) Receiving such benefits or gifts must be part of business operations to invite customers to join business activities, visit factories, etc., in which the allocation of expenses, number of participants The level of accommodation and the duration are specified in advance.
  - 3.6) The receipt of such benefits or gifts must be in accordance with the local festival that is observed in public.
  - 3.7) In case it is necessary to receive gifts, property or other benefits that cannot be returned to the sender, the recipient must prepare a report on the receipt of gifts, property or other benefits in the form of receipt of gifts, property or other benefits. The gift, property or other benefits shall be considered as received on behalf of the organization and delivered together with the items received to the administrative department so that the guidelines for receiving or giving gifts can be distributed to employee welfare or donated to external parties. In the case of consumables with a short shelf life, they shall be managed without delay. The administrative officer shall prepare a summary report on the receipt of gifts or other benefits for the CEO to acknowledge.



- 3.8) The amount specified above may be adjusted as appropriate when necessary and after reporting to the CEO or the person assigned by the CEO.
- 4) Must report to the direct supervisor about receiving gifts as stated above. Such gifts must be delivered to the direct supervisor if received inappropriately or not in accordance with business practices.
  - 5) The Company's personnel may receive gifts that are not cash or valuable items from outsiders who are involved in business with prior approval from the direct supervisor. However, receiving such gifts must comply with regulations, business practices or business etiquette and must not influence the employee's business decision-making, and the value of such gifts must not exceed 3,000 baht (including food, travel and entertainment expenses).
  - 6) Do not seek any benefits from your position in the Company to receive or request outsiders who are involved in business or those related to such outsiders to provide any services unrelated to the Company's business.
  - 7) When the Company's personnel introduce a person to the Company, such action must not conflict with the Company's benefits or hiring procedures, and must not be done for personal benefits that are unlawful. Personnel who are supervisors and subordinates in the same unit must not have a relationship as spouses or parents/children.
  - 8) Do not bribe officials or government officials by offering money, gift cards, checks, shares, gifts or other bribes. Any special compensation or incentives of value to personnel who violate the provisions of the preceding paragraph shall be punished in accordance with the Company's relevant regulations and may be prosecuted according to the law. (Bribes mean property or other benefits given to a person to make that person act or refrain from acting as desired by the person offering the bribe.
  - 9) Must obtain approval from their supervisor before offering gifts (e.g. the Company's products) or entertaining business partners, while still complying with business practices or etiquette, local laws and regulations related to the Company. If the Company's personnel do not obtain approval from their supervisor in advance due to urgent circumstances, such employees must still obtain approval from their supervisor after giving gifts or entertaining external business parties.
  - 10) Must not take advantage of their position in the Company to have improper relationships, sexual harassment on any occasion, whether verbal, physical, mental or sexual, discrimination in any form (including discrimination based on race Disability or religion are the criteria), theft, intimidation, coercion or other unlawful actions. "Verbal" means words or conversations that are aggressive or insulting to others. "Physical" means any action that directly or indirectly harms another person. "Mental" means any action or speech that degrades or destroys the dignity of another person. And "Sexual" means
    - (1) Direct or indirect special offers in exchange for work status and sexual relationship status, or
    - (2) Disciplinary actions, dismissal of employees from positions as a result of refusing such offers, or
    - (3) Inappropriate criticism, watching or touching employees in a manner that expresses and leads to sexual interests, and
    - (4) Performing duties without regard to gender status.
  - 11) Donations on behalf of the Company to political parties, political organizations or candidates must comply with the law on donations to political parties and the Company's related internal procedures. Donations to political parties in the name of individuals must comply with the law on donations to political parties and the Company's related internal procedures. In addition, donations to political parties in order to gain business benefits or business advantages are prohibited.
  - 12) Must comply with the Company's regulations. Regarding donations or support for charity to ensure that such donations or support for charity are legal on behalf of the Company


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- 13) If the Company's employees have questions about anti-corruption and corruption, they must seek the opinion of their supervisors to avoid disputes.
- 14) Support the creation of awareness, values, and attitudes for employees to work honestly, transparently, fairly, and respectfully, and to make anti-corruption and corruption an organizational culture, as well as to manage in accordance with the principles of good corporate governance and support various activities organized by agencies or organizations for the benefit of preventing and supporting the anti-corruption and corruption.

## 5.7 Conflict of Interest

When a conflict of interest arises with the Company, the Company will always proceed in accordance with the law and policies for standard due diligence before considering and approving only those businesses that are beneficial to the Company. The Company has established a policy on conflicts of interest as follows:

- 1) Always be mindful to avoid any potential conflict of interest. Do not engage in any business, investment or activity that may affect the benefits or interfere with the Company's business operations. Conflict of interest includes:
  - (1) Using the Company's assets or using one's position in the Company to seek personal benefits in an improper manner
  - (2) Transferring the Company's resources or benefits to oneself or relatives
  - (3) Entering into negotiations or transactions for oneself or relatives that are adverse to the Company's benefits and
  - (4) Investing in other companies or factories that compete with the Company's business, etc.
- 2) If there is any doubt as to whether the investment business or activity that one is conducting or plans to conduct may cause a conflict of interest or if the Company sees that the investment business or activity that one is conducting may cause a conflict of interest, such employee must disclose the details to the head of the department to which he belongs or a related department and must immediately request permission, unless approved by the head of the department to which he belongs or a related department. Also, do not engage in or invest in any enterprises that conduct the same or similar business as the Company's business under one's or another person's name. The Company's personnel are prohibited from Acting as an employee, employee, agent, consultant or working in other roles at other companies in the same business at the same time as the Company's personnel.
- 3) Do not avoid the Company's Code of Conduct and Work Practices or other related regulations by conducting the activities described above through a third party, including family members, agents, partners or other representatives.
- 4) Do not seek any benefits from your position in the Company to recommend or act as a mediator to recommend products or services that are not provided by the Company for personal gain.
- 5) Avoid making related transactions that may cause conflicts of interest to the Company. If it is necessary to make related transactions, the Company must do so as if it were normal business with outsiders in general, and the related persons must not participate in the decision to enter into such transactions.
- 6) In the event that an executive, employee or family member of the executive or employee is involved in any business that causes or may cause conflicts of interest with the Company's business, that person must report to the Chairman or the Chief Executive Officer.
- 7) Employees or employees who act as consultants or hold any positions in the Company, other organizations or associations outside of such positions must not cause conflicts of interest or directly affect the work or position that that person is responsible for the Company.


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- 8) The Company's personnel Must perform duties with the interests of the country and the company above personal interests and without any conflicts of interest, free from personal desires, influence from relatives or close associates.
- 9) The Company's personnel must always check whether they have any conflicts of interest or benefits in their work. When it is found that they have any conflicts of interest or benefits, that personnel must refrain from performing such duties and have others take responsibility on their behalf in order to eliminate allegations of conflicts of interest or misuse of their power to create benefits for themselves and cause damage to the Company. Therefore, all personnel of the Company must strictly comply with the measures to prevent conflicts of interest and disclosure of conflicts of interest set by the Company.
- 10) Always remember that the Company cannot prescribe every behavior, every event and every situation as a guideline in the Company's business ethics. If the Company's personnel encounter problems in making decisions or performing duties that are not specified in the ethics and code of conduct, ask yourself the following questions about that action:
  - (1) Is the action against the law? If it is against the law, stop it.
  - (2) Is the action against the Company's policy? If it violates the policy, stop it.
  - (3) Does the action violate the company's values or culture? If it violates the values or culture, stop it.
  - (4) Does the action have a negative impact on the company's stakeholders? If it does, stop it.
  - (5) Does the action have a negative impact on the company's image? If it does, stop it.
  - (6) Does the action lead to bad practices in the future? If it does, stop it.

If you are not sure or cannot decide whether your decision is correct, you should discuss it with your colleagues, consult your superiors at the appropriate level or the board, or inquire with the internal control unit.

## 5.8 Ensuring compliance and review of the Code of Ethics and Working Practices

- 5.8.1 This Code of Ethics and Work Practices is the responsibility of all directors, executives and employees who must strictly comply with it. Executives and employees are not allowed to do anything that violates this policy. If there is any ambiguity or any other problem that is not specified in this policy, executives and employees should consult their superiors in order to jointly consider finding a solution or finding an appropriate practice. In addition, the Company Secretary is responsible for coordinating and monitoring the management to comply and is the unit to receive complaints on corporate governance and business ethics.
- 5.8.2 Supervisors at all levels must take care of and be responsible for employees under their supervision to strictly comply with this Code of Ethics and Work Practices.
- 5.8.3 Supervisors at all levels must act as good examples in complying with ethics, the Code of Ethics and Work Practices, and advise, communicate, create understanding, and promote a working environment so that employees and related persons understand that complying with the Code of Ethics and Work Practices is correct and must be strictly followed, and cannot claim that they are not aware of the practices specified in this work manual.
- 5.8.4 Board of Directors Adhere to conducting business under the principles of ethics and good corporate governance along with Corporate Social Responsibility (CSR) until it becomes the corporate culture by integrating with the vision, mission, strategies and goals of the organization to promote an efficient, transparent and auditable management system, which helps build trust and confidence for shareholders, investors and all stakeholders, as well as increase value and promote sustainable growth of the company. In addition, executives at all levels of the company must take care of and be responsible for employees under their supervision to know, understand and comply with the Code of Conduct in a concrete manner.

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If any director or employee violates the Code of Conduct, they will be subject to disciplinary punishment in accordance with the specified regulations.

- 5.8.5 The Company provides human resource procedures and processes that reflect its commitment to combating corruption, such as establishing a small committee to recruit or select personnel, especially for jobs that require personnel with specific qualifications, promotions, training, performance evaluations, compensation, fairness, and employee punishment processes, etc.
- 5.8.6 The Company will provide training and explanations on various policies of the Company during orientation for new directors and employees. The details must be explained so that they can be implemented appropriately, including communication and explanations of penalties for failure to comply with the Company's regulations.
- 5.8.7 The Company will conduct an annual assessment of business risks covering all aspects of the overall picture, including considering or improving appropriate measures or practices and adhering to the principles as stated in the intention to combat corruption for all parties/departments or activities that are highly likely to cause corruption.
- 5.8.8 The Company will require all executives and employees to conduct self-assessments annually and review the assessment results by their supervisors in order of rank.
- 5.8.9 When there is a problem with the implementation or interpretation of the Code of Ethics, Ethics, or Code of Conduct, the problem must be raised in accordance with the chain of command. The Board of Directors has the ultimate decision-making power and the decision of the Board of Directors shall be final.
- 5.8.10 The Company shall review the Code of Ethics and Work Practices every 2 years to ensure that it is appropriate for the changing business situation and environment.
- 5.8.11 This Code of Ethics and Work Practices shall be considered as part of the Company's regulations.

## 5.9 Internal training, discipline and complaint channels


### 5.9.1 Training

The Company expects all employees to jointly monitor compliance with the Code of Ethics and Code of Conduct by encouraging inquiries in case of doubts or concerns about the guidelines for practice, including providing opportunities for employees or the general public to report any inappropriate behavior or behavior that violates ethics, codes of conduct, or codes of conduct. The whistleblower can follow the procedures in the whistleblowing and complaints document that the Company has announced at [www.adb.co.th](http://www.adb.co.th) and <http://knowledge.adb.com>.

### 5.9.2 Discipline and punishment

For the Company's employees who violate the Code of Ethics and Work Practices and cause damage to the Company, the Company may take disciplinary action as specified below, one or a combination, depending on the case and in accordance with the applicable work regulations, considering the severity of the violation and may punish the employees who commit the violation in accordance with civil and/or criminal laws as follows:

- (1) Verbal warning
- (2) Issue a warning letter, record the employee's guilt in the violation
- (3) Deduct bonuses from performance or annual bonuses or terminate employment
- (4) If the violation is serious, the company may dismiss the employee in accordance with the Labor Protection Act B.E. 2541 and the terms of the employment contract
- (5) If it is found that the supervisor intentionally conceals or fails to supervise the subordinate employee who violates the Code of Conduct, the supervisor may be warned or terminated.

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### 5.9.3 Channels for reporting clues and complaints

All employees of the Company are required to report matters to the following persons/agencies when they find that the Company's employees may be involved in activities that violate the law or the Code of Ethics and Working Practices, as follows:

- 1) The head of the management unit to which the employee belongs
- 2) The head of the Internal Control Office, acting and/or the Director of Human Resources and Development or legal advisor
- 3) Suggestion box
- 4) E-mail

- Mechanisms for providing feedback from In order to maintain the Company's missions and enhance its reputation, when an employee is accused of violating the Code of Ethics and Working Practices, the following channels should be provided for the convenience of clarifying and communicating information on wrongdoing through the following channels:


- (1) Suggestion box
- (2) E-mail box at [adb\\_cg@adb.co.th](mailto:adb_cg@adb.co.th)
- (3) Website at [www.adb.co.th](http://www.adb.co.th)

- Anonymity and confidentiality Employees of the Company or external complainants may choose not to disclose their names when reporting wrongdoings by other employees. However, employees are encouraged to identify themselves when making a report to facilitate contact and investigation. When employees of the Company or external complainants make a report, the receiving agency shall take appropriate protection and prevention measures. In order to conduct effective investigations and to prevent such employees or external complainants from being harassed or treated unfairly, this protection and prevention measure shall also be applied to persons who have reported any employee misconduct through the channels specified in Section 4 above.

The Company promises to listen to all reports of whistleblowing in an equitable, transparent and considerate manner, and to be fair to all parties. The investigation period shall be appropriate. The name of the whistleblower shall be kept confidential. The whistleblower shall be protected from harassment during and after the investigation. If any employee or member of the public finds any suspected violation or non-compliance with this Code of Ethics and Code of Conduct, they may inquire or report to their supervisor.

#### Channel Whistleblowing

Channel Whistleblowing Inside	Channel Whistleblowing Outside
<ol style="list-style-type: none"> <li>1. Trusted supervisors at all levels</li> <li>2. Chief Executive Officer (CEO)</li> <li>3. Any of the Company's Directors</li> <li>4. Internal Control Unit</li> <li>5. E-mail: <a href="mailto:adb_cg@adb.co.th">adb_cg@adb.co.th</a> The email will be sent to the Chief Executive Officer, Customer Relations, Human Resources and Development, Company Secretariat and Internal Audit Unit.</li> <li>6. Suggestion boxes installed at the security booths of every branch of the Company</li> </ol>	<ol style="list-style-type: none"> <li>1. Any of the Company's Directors</li> <li>2. E-mail: <a href="mailto:adb_cg@adb.co.th">adb_cg@adb.co.th</a> The email will be sent to the Chief Executive Officer, Customer Relations, Human Resources and Development, Company Secretariat and Internal Audit Unit.</li> <li>3. Website at <a href="http://www.adb.co.th">www.adb.co.th</a></li> <li>4. Contact via phone number 02-709 4040 <ul style="list-style-type: none"> <li>➤ Investor Relations Section Ext. 1097-1099</li> <li>➤ Internal Control Section Ext. 1097-1099</li> </ul> </li> </ol>

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Channel Whistleblowing Inside	Channel Whistleblowing Outside
<p>Send a letter to</p> <p><b>Audit Committee and/or Internal Control Unit</b></p> <p>Applied DB Public Company Limited</p> <p>No.252 Moo 4, Sukumvit Road, Prakasa, Muang, Samutprakan, 10280</p>	

### 5.10 Penalties

All directors, executives and employees have a duty to comply with and encourage others to comply with this Code of Ethics and Work Practices. The following actions are considered a violation or omission of compliance with this work manual:

- 1) Failure to comply with this Code of Ethics and Work Practices document.
- 2) Advising, promoting or supporting others not to comply with this Code of Ethics and Work Practices.
- 3) Neglecting or ignoring when encountering a violation or non-compliance with this Code of Ethics and Work Practices if they know or should know because it is related to their work under their responsibility.
- 4) Failing to cooperate with or obstructing an investigation or inquiry into the facts that are alleged to have been a violation or non-compliance with this Code of Ethics and Work Practices.
- 5) Acting unfairly towards others because that person reported non-compliance with this Code of Ethics and Work Practices.

Any actions that are considered unethical as mentioned above will be subject to disciplinary punishment as appropriate according to the trial process, including being prosecuted if the action is illegal.

This Code of Conduct and Code of Conduct cannot provide comprehensive guidance in every situation or answer every question that may arise. Therefore, it is essential that companies use common sense to consider what is right and when to consult with other experts, both internal and external, to establish appropriate behavioural guidelines. When in doubt about your decision, ask yourself the following questions:


- 1) Is the action against the law? If it is against the law, stop the action.
- 2) Is the action against the company's policy? If it is against the company's policy, stop the action.
- 3) Is the action against the company's values or culture? If it is against the company's values or culture, stop the action.
- 4) Does the action affect the company's stakeholders? If it is harmful, stop.
- 5) Does the action harm the company's image? If it is harmful, stop.
- 6) Will the action lead to future bad practices? If it is harmful, stop.

In the event that you are not sure or cannot decide whether your decision is right, you should discuss it with your supervisor, executives, or board members involved in the matter.

### 5.11 Letter of Acknowledgement and Consent

In the promulgation of the Code of Ethics and Work Practices and when there are changes, the employees must be informed of the essential contents, including any additional items, and the employees must be assured that:

- 1) The employees have accessed the documents and have read and understood the Company's Code of Ethics and Work Practices.
- 2) The employees understand and will adhere to the principles in the Code of Ethics and Work Practices in their operations to the highest standards.
- 3) The employees are aware that any violation or non-compliance with this Code of Ethics and Work Practices manual may result in disciplinary action by the Company or by law if the action is illegal under the law.

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- 4) The employees will sign to acknowledge the Company's policies in the employment documents and when communicated in the annual review round in the annual training documents to the HR officers.

This Code of Ethics and Work Practices. The Board of Directors' Meeting No.5/2025 on November 7, 2025, and will be effective from November 10, 2025 onwards.



(Mr.Pawat Wongtangtrakul)

Chairman of the Board