



Finansia Syrus Securities Public Company Limited

Code of Conduct

(Revised version according to the resolution of the Board of Directors' Meeting

No. 14/2022 on 27 December 2022)



Code of Conduct

Finansia Syrus Securities Public Company Limited (“Company”)

1. Business Ethics

The Company places importance on ensuring compliance with the business ethics as follows:

- 1.1 perform duties with honesty, integrity, responsibility; comply with the conditions given to creditors and customers; comply with the law, official and related regulations, including anti-corruption policies, Anti-Money Laundering, Combating the Financing of Terrorism, and the Proliferation of Weapons of Mass Destruction
- 1.2 perform duties like a professional who has knowledge, abilities, expertise, carefulness, and prudence
- 1.3 aim for shareholders to receive appropriate returns by operating and aiming for consistently excellent results
- 1.4 maintain confidentiality and do not use inside information or confidential information to exploit for yourself and others
- 1.5 avoid actions that may lead to conflicts of interest.

2. Service standard

The Company must build trust among customers and stakeholders, by providing service standards as follows:

- 2.1 manage work effectively to ensure that customers and stakeholders receive good service
- 2.2 ensure that there is a prudent management, audit and internal control system to prevent service errors
- 2.3 ensure that there is a risk management system in line with the business so that the Company can manage potential risks appropriately.

3. Employees and working environment

The Company provides facilities for efficient performance of duties of all employees as follows:

- 3.1 recruit and retain talented employees; encourage, support, and develop employees continuously and consistently to provide them with opportunities for career advancement and stability
- 3.2 treat all employees fairly and with dignity
- 3.3 do not discriminate on the basis of gender, race, age, religion, or disability
- 3.4 provide fair compensation to employees on the basis of fair performance evaluation

- 3.5 provide a good and safe working environment, ready to serve customers
- 3.6 keep personal information of employees confidential and do not exploit personal information of employees for benefits
- 3.7 Ensure no verbal or physical harassment that may affect the honor or dignity of others in the workplace
- 3.8 provide various channels to file a complaint or report a question of integrity, unfairness, or non-compliance with the law and related regulations
- 3.9 In the event that there is an investigation related to operations, the Company shall supervise employees to cooperate with internal and external supervisory agencies
- 3.10 provide disciplinary action against anyone who fails to comply with the law, regulations or rules, as appropriate to the effects and nature of the offense and fair to all parties without discrimination
- 3.11 uphold the principles of human rights as a principle of practice with all employees and ensure that employees understand the principles of human rights to be used as part of the operation

4. Responsibility to customers

The Company values and treats customers responsibly as follows:

- 4.1 operate business by focusing on providing quality financial services
- 4.2 maintains sustainable customer relationships. The Company does not accept bribes and/or rewards, gifts, assets or entertainment in any form, which implies an intention to act incorrectly in favor of customers
- 4.3 provide products and services that are suitable for the needs and capabilities of the customers
- 4.4 make arrangements that accurate, clear, and up-to-date information about the Company's products and services which is disclosed to customers. The information includes, among others, conditions and related risks as well as service fees and interest rates. The objective is for customers to have adequate information to study to understand before making a decision. As well, the Company has to ensure that all of its advertising and public relations messages must be conveyed in a clear and transparent manner in order to prevent any misunderstandings
- 4.5 puts in place a clear and appropriate process for accepting complaints and dealing with the various issues which customers complain about, for example, via telephone or at branches.

5. Conflicts of Interest

The Company establishes the following measures for managing conflicts of interest in the conduct of business affairs as follows:

5.1 puts in place control and preventive measures, aiming at dealing with transactions with conflict of interest or related-party transactions or inappropriate related-party transaction. The Company establishes policies and regulations and also discloses the related-party transactions in line with the requirements imposed by the regulating agencies concerned

5.2 Prevent the use of inside information

- a. provide securities trading control measures and disclose the presence of securities trading accounts of directors, executives, and employees who may have access to inside information, including related parties, to prevent the use of information from their positions, duties, or work to profit in the wrong way for oneself or others
- b. separate locations of workplace or prevents information leakage between work units by making an arrangement for the separation of the work units which may have a conflict of interest

5.3 Transactions with related parties and connected transactions

- a. set regulations on entering into related transactions and determine the process of careful consideration for the benefit of the Company and shareholders
- b. entering into transactions between the Company and directors, executives, major shareholders, and related persons must not have characteristics that transfer the benefits of the Company to the persons concerned
- c. Employees who have a conflict of interest in any transaction are required not to participate in the approval process relating to such transaction to ensure that the decision making is in the best interests of the Company.

5.4 Accepting or giving gift and other benefits

- a. establishes a regulation which governs the exchange of gifts, presents, rewards, receptions, or other benefits for the purpose of developing business relationships. Such exchange has to be done in a careful manner, ensuring that the related values are appropriate and also taking into consideration the ongoing festival, tradition and custom
- b. no bribe, reward, offer, solicitation, or any other improper interests, directly or indirectly, to customers, government agencies, the private sector, or third parties in order to influence the use of impartial judgment in decision-making or causing influence to others to act in their duties or causing unreasonable benefits.

6. Information Management

The Company puts in place appropriate information management systems as follows:

6.1 Information Management

- a. safeguards, protects, stores and looks after the information of its customers, employees, business partners, and Company in line with the legal requirements

b. do not disclose the information of customers, employees, business partners, and Company unless with the consent of customers, employees, business partners or Company, as the case may be, or to comply with relevant laws.

6.2 Communication

- a. disclose the information of the organization, which is accurate, complete, adequate, fair, transparent, and up-to-date, as required by the law or the state agencies concerned
- b. disclosure of information to the press, customers, employees, and business partners must be done appropriately and by persons assigned by the Company only.

7. Overall Governance

The Company conducts its business affairs in compliance with the law, rules, regulations, the policies and regulations of the Company as well as the principles of good corporate governance as follows:

- 7.1 adheres to the principles of good corporate governance set by the official agency that supervises the Company as a securities company and listed companies as well as building confidence in the stakeholders by focusing on the development of corporate governance of the Company to meet international standards for the benefit and confidence of all stakeholders
- 7.2 encourage its employees not only to have knowledge and understanding of the laws and regulations but also to recognize the risks arising from non-compliance with the laws and regulations, as well as the damage that may be caused to the Company's business operations, image and reputation as well as the employees' own duties and responsibilities
- 7.3 establish a work unit which is responsible for ensuring that the conduct of business affairs is in compliance with the laws and regulations. The work unit carries out its duties in a manner independent of the management. In addition, the Company allocates appropriate and adequate resources and personnel for the work unit
- 7.4 oversee and review its compliance not only with the laws and regulations established by the state agencies concerned, but also with the Company's policies and regulations. In addition, the Company puts in place management guidelines to problem solving as well as preventative measures within the framework of the laws, regulations, the principles of good corporate governance, as well as the Company's policies and regulations.

8. Business Competition and Dispute Settlement

The Company has established the following business operations systems which are efficient and sustainable as follows:

- 8.1 conducts its business affairs and treat competitors within the framework of fair rules and fair business competition without entering into mutual agreements with another company to fix buying prices, selling prices, or terms of services which are unfair to customers; keep confidentiality under relevant law and regulations

- 8.2 offer products and services which are of benefit and good value to customers, where customers can freely choose to use any services and the Company shall refrain from overzealously persuading them not to switch to the brokerage services offered by another company
- 8.3 do not verbally attack its competitors and not commit any act which is construed as a monopoly or any act which restrains or reduces competition in the marketplace
- 8.4 If there are disputes or complaints, the Company shall put in place appropriate procedures for resolving or mediating the disputes or complaints.

9. Society and environment

- 9.1 The Company is committed to conducting its business with social responsibility and is careful in considering actions that affect public interest. In addition, the Company regularly supports activities that are beneficial to the community and society as a whole.
- 9.2 The Company attaches great importance to safety and environmental protection of the Company in order not to have an impact on nearby communities and to encourage employees to have awareness and responsibility for the society and environment.

The Code of Conduct for Directors, Executives, and Employees

This Code of Conduct applies to directors, executives and all employees of the Company. In this regard, “employees” shall include executives and employees of all levels, including all contracted employees, whether a fixed-period contract or an indefinite period.

1. Good Corporate Governance

- 1.1 Directors and executives play an important role in putting in place good corporate governance which builds stakeholder confidence. Good corporate governance brings about maximum benefits for the organization, the industry and the country. As well, Directors and executives establish good corporate governance policies and put them down in clear writing. As well, they prepare the Code of Ethics and distribute it to executives and employees for implementation in the most efficient manner.
- 1.2 Directors and executives must act in compliance with the principles of good corporate governance. In this connection, they establish various policies relating to business operations and direction. As well, they must make arrangements for good corporate governance. Directors must ensure that executives and the management implement the established policies in an efficient and effective manner.
- 1.3 The Company's business operations are governed by the relevant laws, rules, and regulations of the official authorities. Therefore, directors as representatives of shareholders must formulate policies with the Company's executives as the

management team to push for proper and efficient implementation and establish an internal control system that is effective to supervise the Company's business operations properly.

- 1.4 Directors ensure that the Company puts in place risk management policies and systems which are efficient in order to accommodate the Company's key risks. They also ensure that the Risk Management Committee is able to carry out its duties effectively, in a professional manner independent of business units. In addition, they must be aware of various risks which may arise. As well, they must not only protect and look after the Company's interests but also reduce potential damages to an acceptable level within the efficient risk management framework.

2. Maintain benefits, good image, dignity, reputation, and virtue

Directors, executives, and employees should act as a good role model as follows:

- 2.1 have honesty, fairness, integrity, responsibility, ethics in business; not make promises or obligations on matters that cannot be performed; act with caution in the performance of duties; committed to performing to the best of our ability; adherence to reality and does not cause misunderstandings directly or indirectly for the best interest of the Company and its stakeholders under the Business Judgment Rule; take into account and maintain the interests of the Company as a priority; and pay attention to the events that happen to the Company or the actions of the Company
- 2.2 protection of the Company's interests must arise from fair and legitimate action and do not act, support, or allow themselves to be a tool to circumvent compliance with laws or regulations in accordance with the principles of good governance business
- 2.3 be careful of any actions or expressions including the use of social media that may affect the image of the Company
- 2.4 communication both within and outside the Company must be accurate, honest, direct, and use appropriate communication channels in each situation.

3. Conflict of Interest

operate with the Company's interests in mind; always take into account that in the performance of one's duties, there must be no conflict of interest or interests with the Company; and avoid conflicts of interest that may arise either directly or indirectly.

4. Data reliability

All information of the Company must be true and accurate.

- 4.1 Executives, shareholders, creditors, and regulators rely on the accuracy of the Company's information to monitor operations and make decisions. Therefore, everyone must work together to keep the information accurate by recording and producing accurate and timely reports.

4.2 Directors, executives, and employees are required to cooperate to the best of their ability with internal and external auditors when requested.

5. Confidentiality of information

5.1 do not disclose the Company's information that has not been made public, unless required by law or approved by the Company. In order to maintain the confidentiality of the information of the Company, customers, products, services, plans, strategies, methods of operation, and work systems, all relevant parties must not take information known or made out of their duties in the Company to use in other ways, other than the work for which they are responsible, and will not use the information for personal gain or for the benefit of others, whether while still performing duties or having been discharged from the performance of duties

5.2 The retention of customer information is an important matter that all concerned parties must strictly follow. They are prohibited from disclosing any customer information to any other person, by any means or medium, except for the disclosure of the customer's information to authorized persons by law or by court order.

5.3 maintain confidentiality of information, including personal information of customers, employees, and other personal data subjects, which means information that can directly or indirectly identify an individual, such as first name, last name, identification number, passport number, date of birth, gender, age, financial information, contact information, career information, income, education, electronic information, income and benefits information, and medical information. Such information can only be disclosed to the owner of the information and related parties to whom the Company has the right to access the information for use in the Company's work or when it is absolutely necessary. Persons responsible for this personal data are required to comply with the said policy with great care and strict confidentiality.

6. Using Insider Information for Securities Trading

Those who know inside information or non-public information are prohibited from trading stocks or any other related securities and from disclosure or exploit such information for the benefit of one's own and/or others, directly or indirectly.

7. Anti-Money Laundering, Combating the Financing of Terrorism, and the Proliferation of Weapons of Mass Destruction

The Company adheres to and abides by the rules, regulations and laws relating to Anti-Money Laundering, Combating the Financing of Terrorism, and the Proliferation of Weapons of Mass Destruction, and will not endorse or engage in the acquisition, transfer, or alteration of any related property against the commission of an offense, to prevent anyone from using the Company as a means or tool to transfer, conceal, or disguise the source of unlawfully acquired assets.

8. Anti-Corruption and Bribery

The Company has a policy against all forms of corruption. Directors, executives, and employees are responsible for studying and understanding the Company's anti-corruption and bribery policies and strictly following the guidelines set forth.

9. Gambling, alcohol, and drugs

9.1 Consuming, possessing, buying, selling, transporting narcotics or controlled substances (except prescription drugs) of any kind and by any means are prohibited

9.2 Do not drink alcoholic beverages while on duty, except at a party or welcoming customers in accordance with the Company's regulations and must not drink until intoxicated or unconscious

9.3 Gambling of any kind is prohibited, whether during duty or not.

10. Giving and Receiving Gifts and Entertainment

10.1 Do not use the position of work to seek personal benefits from the business partners, including those who are contacting to do business with the Company

10.2 Must not solicit or express any direct or indirect intention to receive money and/or assets and/or any other benefits that may affect business decisions on behalf of the Company unless received on an official ceremonial occasion or according to good local traditions or trade customs

10.3 The traditional exchange of gifts or entertainment such as meals or entertainment with another person, etc., can be done as appropriate to maintain business relationships, without accepting and giving gifts in the form of cash or cash-like assets such as gold, diamonds, or easily convertible financial instruments such as gift checks etc.

11. Company assets

11.1 Everyone has a responsibility to take care of Company assets from loss, damage, or misuse. This responsibility extends not only to the conduct, but also to the care to comply with security procedures and to be alert to situations and incidents that may result in the loss of Company assets, damage, or misuse.

11.2 Company assets include cash, financial instruments, company information, intellectual property, computer system programs, software, electronic mail, documents, facilities, vehicles, company names, company symbols, and equipment materials.

11.3 Intellectual property includes patents, petty patents, copyrights, trademarks, trade secrets, or any other information that is a valuable property of the Company. Everyone has a duty to protect the Company's intellectual property from unauthorized use or distribution and to respect the copyright of the intellectual property owner.

12. Other work or outside activities

12.1 Any personal transaction or affairs must be separate from the operations of the Company, do not use the Company's name in private transactions, operate at arm's length or in normal commercial practice as a transaction with a general person who has no special relationship, focus primarily on the organization's benefit, avoid potential or expected conflicts of interest, and in the event of a conflict of interest, such conflicts of interest must be dealt with fairly and quickly

12.2 must perform their duties with responsibility, caution, accuracy, honesty, and in accordance with relevant official and legal rules, regulations, policies, and procedures set forth by the Company

12.3 Executives or employees must not be employed by other companies or engage in other external activities that are not related to the Company during the performance of duties.

13. Harassment

Commit to creating a positive working environment that is productive without any harassment such as verbal harassment, physical harassment, sexual harassment, harassment of text, images, or electronic media, etc.

14. Whistleblower

The Company has a whistleblower channel to allow employees to file complaints, provide information, or report fraud, corruption, non-compliance with regulations, rules, and codes of conduct, for transparency in accordance with good governance through the following channels:

E-mail Address: compliance@fnsyus.com

Direct telephone: 02 680 0710-18

Compliance Department

Finansia Syrus Securities Public Company Limited

719, 8th floor, MINT TOWER, Bantadthong Road, Wang Mai, Pathum Wan, Bangkok 10330

Reporters, complainants, or co-operators can choose to remain anonymous if they see that disclosure will cause insecurity or any negative impact.

The Company treats the relevant information as confidential, will disclose it to the extent necessary taking into account the safety and adverse effects of the reporter, the source of the information, or the person concerned. Those involved in the investigation or

fact-finding process are obliged to maintain the confidentiality of the informant strictly. Any violation or unfair act against a complainant, whistleblower, or witness is considered a serious disciplinary breach and may be a legal offense.

15. Conclusion

Fairness, honesty, and integrity are the cornerstones of the Company's business operations. The Company is committed to providing excellent service, where such commitment must be part of every employee and is expressed clearly, through speech, action, and gesture. Polite, sincere, caring, and enthusiastic expression must be evident in all dealings with customers and third parties, whether it be in person service, telephone conversations, written communications, or information technology communications.

This culture of service excellence is a culture that can be sustained only when all employees treat one another with enthusiasm, collaboration, teamwork, and readiness, which is a characteristic that employees must learn from each other.

Compliance with the Code of Conduct will promote a good image and culture of the Company, which will result in sustainable business operations and maximum benefits for customers, shareholders, employees, and society.

Ideology and Code of Conduct for Business Partners

The Company¹ conducts business with integrity in accordance with good corporate governance principles, coupled with a commitment to care, promote, support society and the environment in accordance with sustainable development guidelines, which are important factors leading to the balance of society, environment, and business to grow together sustainably.

The Company intends to promote this principle to its business partners², who are key players in the Company's business, to implement the principles and ideas, for social outreach and to achieve correct understanding together. The Company has prepared "Code of Conduct for Business Partners" for the Company's business partners to use as a guideline for further practice. The Company encourages business partners to conduct business with ethics, respect rights and liberties, take care of labor and human rights, take care of occupational health, safety and the environment, as well as monitor the implementation of "Code of Conduct for Business Partners" to achieve the objectives. In the event that business partners do not comply with "Code of Conduct for Business Partners", the Company reserves the right to take any action against the business partners, considering the impact and damage incurred.

¹ Company means Finansia Syrus Securities Public Company Limited.

² Business Partner means a vendor, contractor and/or service provider to the Company and its sub-contractors, contractors and/or service providers thereof.

1. Business Ethics

- **Business Integrity**
Conduct business on the basis of integrity, honesty, transparency, ethics, strictly complying with relevant laws and regulations, not commit any act that is corruption, bribery by giving, offering, or accepting money, asset, or any other benefit, including giving an advantage to others to induce oneself or any other person to receive unjustified benefits.
- **Fairness**
Conduct business responsibly, provide fair treatment to all parties, respect the interests of others with relationships, and not act in a manner that impedes fair price competition.
- **Disclosure of Information**
Disclose information accurately and completely as required by law
- **Confidentiality**
Prevent the leakage of confidential Company information, do not disclose or use confidential information of the Company, customers, and related parties of business partners to exploit for themselves or anyone else without their consent, including to not allow the use of confidential information under any law, rules, and regulations of relevant government agencies
- **Intellectual Property Rights**
Respect the intellectual property rights of the Company and others and be careful not to infringe such rights

2. Labor & Human Rights

- **Non-discrimination**

Consider human dignity, equality, fairness, do not discriminate against employees because of differences in physical, mental, ethnicity, nationality, religion, sex, age, education, marital status, pregnant women, political opinions, disabilities, or any other matter

- **Labor Protection**

- Do not employ child labor under the legal age
- Female employees are not allowed to work in a manner that could be hazardous to their health and safety. In the case of an employee who is a pregnant woman, the Company must provide protection and benefits as prescribed by law
- Employing foreign workers must be done in accordance with the law accurately and completely
- Termination of employment must be carried out at each stage in accordance with labor law and must not be unfair

- **Non-Forced Labor**

Do not use or benefit from forced, unwilling, or slave labor, which includes physical punishment, intimidation, incarceration, intimidation, harassment, trafficking, human, or violence in any form

- **Wages and benefits**

Pay wages, overtime pay, and holiday pay, including the implementation of the rights and benefits that the employee receives correctly and fairly, not lower than the rate prescribed by law, and the employee must receive it directly on schedule

- **Working period**

Employees are not allowed to work for longer periods than those required by law. Working overtime or on holidays must be voluntary. The Company shall have for employees to have holidays and leave days not less than those prescribed by law.

3. Occupational Health & Safety

- **Safety and working environment**

Provide safety measures for employees and related persons, by providing a safe, hygienic working environment, reducing and controlling the risks of accidents, and the potential health effects of operations, transportation, services, as well as providing guidelines to control emergency situations to reduce losses

- **Personal protective equipment**

Provide adequate personal protective equipment to employees according to the risks and ready for use

4. Environment

Comply with laws, regulations, environmental standards, operate with care for the environment, preserve the environment, use natural resources efficiently and effectively, conserve natural resources, reduce environmental impact according to the following guidelines:

- Reduce
- Reuse/ Recycle
- Replenish

5. Laws & Regulations

Comply with all applicable laws and regulations