



BUSINESS CODE OF ETHICS

Wow Factor Public Company Limited

BUSINESS CODE OF ETHICS

Wow Factor Public Company Limited

Introduction

Business code of ethics are important principles and code of practices for the executives and employees must comply with and also encourage the persons associate with the Company to perform in the same way with the Directors as a good role model. Whenever all Company's members act in a unidirectional manner, it will reflect the corporate governance of the Company' as a guideline for making the Company to sustainably grow.

Persons to follow the Business Code of Ethics

Directors, executives, and employees are all obliged to comply with this Business Code of Ethics and do a self-review if they perform in consistence with the Code of Ethics. They are also responsible for reporting an incident of violations or noncompliance with the Business Code of Ethics via specified channels.

Complaint Channel

When detecting an act of violation or noncompliance with the Business Code of Ethics, shall proceed as follows:

1. In case of doubt without clear evidence, consult a reliable supervisor at all levels, but should not refer to or identify any person for your safety and to protect the human right of accused person without adequate evidence.
2. In case of believing that there is sufficient evidence about a violation or non-compliance with the Business Code of Ethics, the available evidence must be submitted and reported to the chief at highest rank of Human Resources Department, and identity nondisclosure can be opted.
3. In case of a related person is a senior management, report should be directly informed to the Audit Committee

Nevertheless, the Company does not recommend investigating by their own for the safety of complainants or whistle-blowers and to protect the personal rights of those concerned.

Business Code of Ethics

1. Environment, Health, and Safety

Principle

The Company operates its business with an emphasis on environment, health, and safety as well as stipulates standardized management. The Directors, executives, and employees, including business-related persons, are obliged to comply with all applicable laws, policies, standards, and

regulations on the environment, health, and safety in all areas of the Company's business. The Company has also encouraged the efficient use of resources including the development of work systems or technologies that reduce resources consumption.

Examples of Practice

1. Avoid taking any acts that may be harmful to the environment, health and safety. If it is unavoidable, such act shall not be illegal or against the local custom and tradition.
 2. Use all company's resources to carry out their assignments for company interests worthwhile and economically.
 3. Promote the development of environmentally friendly work process or technology.
 4. Understand various contingency plans and participate in any emergency drills organized by the Company.
 5. Once encountering unsafe working conditions, everyone must stop working and fix such dangerous circumstances to be safe before carrying on their works and immediately report to those involved.
2. **Compliance with laws, commitments, agreements, and respect for different culture, custom, and tradition**

Principle

The Company's members must comply with all applicable laws and regulations while respecting the culture, custom, and tradition in all areas where the business is operated, and adhere to commitments and agreements.

Examples of Practice

1. Study, understand, and comply with the laws related to the Company's business operation, including important custom and tradition, especially in the working area.
2. Study, understand and comply with regulations, internal rules, and procedures related to their responsibilities.
3. When finding that the internal rules, regulations, and procedures are inconsistent with the law or contrary to the local custom and tradition, consult the relevant department before taking any action.
4. When detecting any violation or non-compliance with the laws, internal rules, regulations, and operating procedures, they shall report to the supervisor or complaint channels of the Company.
5. Respect the differences of local culture, custom, and tradition without doing anything contrary to that culture, custom, and tradition.

3. Human rights and Human resources

Principle

The Company respects the human rights of all persons by equitable treatment without discrimination and also promotes human rights while avoiding human rights violations.

The Company recognizes the importance of human resources as the vital factor leading to sustainable success. Therefore, the Company has set the standards concerning welfare and compensation in various forms that shall attract decent and talented persons to work for the Company. In addition, the Company has formulated the personnel's potential development plan continually. All employees shall be treated fairly according to labor laws and related regulations.

Examples of Practice

1. Treat each other with respect and dignity.
2. Treat each other equally without discrimination related to physical and mental condition, ethnicity, nationality, religion, gender, language, age, complexion, education, social status, and other matters.
3. Perform their duties with caution to prevent the risk of human rights violations in business operations, including those associated
4. Supervise the respect for human rights and report supervisors to prevent acts that violate human rights.
5. The Company's personnel shall be treated equally in all employment processes, for instance, recruitment, remuneration, working hours, assignments, performance appraisal, training and development, and career path without discrimination.
6. Do not use labor from unlawful human trafficking or child labor, including punishing the employee's body or mind whether through threatening, detention, restraint, intimidation, harassment or any form of violence.

4. Conflict of Interest

Principle

Every decision must focus on the highest benefit of the Company by recognizing impacts on stakeholders. The decision for personal or others' interest unlawfully or immorally is prohibited. However, the Company recognizes that the conflict of interest may arise, once they are known, they must not be involved in making decisions or choosing their interests primarily regardless of the benefit of the Company. If there is a conflict of interest, they must urgently notify supervisors or the responsible department.

Examples of Practices

1. Do not operate a business that competes to be a partner, shareholder with decision-making power, director or executive in a business that competes with, or has the same business as the

Company or in a juristic person owned by the Company. If it is inevitable, report to the supervisor immediately.

2. Do not engage in any transaction with counterparties related to themselves, such as family members, close relatives, or persons, or self-owned or partner even if it is beneficial to the Company.
3. Do not seek benefits from the information, or what oneself or others know due to job position and responsibility.
4. Do not take for yourself any discount or reward received from suppliers through company procurement. The gift or discount must be delivered to the Company in its entirety.
5. Avoid doing other work for personal benefits other than working in one's duty and responsibilities.
6. Avoid spending working time on a regular basis searching for information, contacting or trading any securities or assets for the benefit of yourself or others that are not for the benefit of the Company.
7. If there is any transaction that may cause a conflict of interest with the Company, it must be reported to the supervisor immediately.

5. Data and Assets Management

Principle

Using and storing data and assets requires good standard management based on related laws and impacts on stakeholders as a whole. It aims to ensure that any data and various assets are utilized for the maximum benefits of the Company and not used in a manner that may prejudice the Company the Company's assets mean movable properties such as office equipment, tools, machines, computer systems for controlling, processing, software, etc., including immovable properties such as lands, buildings, and other technologies and intellectual property of the Company.

Examples of Practice

1. Record and report various information accurately and straightforwardly.
2. Documents or data must be stored and destroyed with a suitable method by each type of data or document.
3. Use documentary evidence in support of correct, true, and complete accounting and financial transactions.
4. Keep information or documents used for approval in various matters, especially related to accounting and financial transactions, to be safe, systematic, and traceable. When the period of data or document storage is due, it must be supervised to destroy appropriately according to each type of data and document.

5. Any persons responsible for keeping the information in possession or custody of the Company shall protect such information of employees and persons related to business operation. Thus, the usage, disclosure, or transmission of the personal information of employees and related persons can be done to the extent possible and shall be normal duty performance without violating legal rights.

6. Confidentiality and Transparency in Information Disclosure

Principle

Information of all kinds created or obtained during duty performance is confidential information and must not be disclosed to irrelevant persons unless such information is legally publicized. In this regard, the Company has recognized the importance of information disclosure accurately, completely, and timely to assure stakeholders of the Company.

Examples of Practice

1. Do not use the Company's information for personal benefit or others illegally.
2. Supervise the responsible sectors not to disclose exaggerated or unnecessary information, especially for data that may cause misunderstanding or affect abnormal securities trading. In the case of information related to joint ventures or other partners must be approved by the joint venture or partners or as specified in the contract.
3. Keep confidential information such as trade secrets, invention formulas, software, technology, academic knowledge, etc. not to be released to irrelevant persons unless approved by the authorized person or required to comply with the law. Even after termination of employment, the Company's confidential information must not be disclosed, kept, or used for personal benefit.
4. When detecting an abnormality, or defect, or invalidity of any information, including accounting and financial transactions must immediately report to the supervisor or financial and accounting department.

7. Anti-corruption

Principle

The Company resists all kinds of anti-corruption, abides by all laws related to anti-corruption in all areas of operating business and not engage in any fraud both directly and indirectly. All directors, executives, and employees must comply. The verification of adequacy and suitability of anti-corruption measures must be done regularly at least once a year. The fraud must be inspected by the audit department. Nevertheless, the directors, executives and supervisors at all levels are obliged to monitor subordinates not to violate or not comply with the Code of Ethics in this regard, as well as to communicate and educate related persons.

Examples of Practice

1. Not commit to or involve in any form of corruption, by any means, whether directly or indirectly. For the recruitment, their profiles must be thoroughly inspected to prevent fraud.
2. Operate properly, transparent, verifiable, straightforward when contacting, coordinating, asking for permission, asking for approval of legal acts or transactions with government officials or public or private agencies.
3. In any juristic act or transaction with the unfamiliar third party, the profile, background, reputation of that person must be thoroughly examined. The conditions in that legal act, or the transaction shall be stipulated to ensure that there will be no corruption in any case.
4. Employing government officials as consultants, related persons must ensure that the terms of employment are legal, transparent, suitable, and non-corruption.
5. Employing any person to act on for the company, the related person must inform the contractor of the business code of ethics in this regard, and ensure that the employment conditions are under the law, transparency, suitable and non-corruption.
6. Not neglecting or ignoring when detecting any actions that may involve fraud related to the Company. It is a must to immediately notify the supervisor or responsible person and cooperate in fact investigation.
7. The Board of Directors has duties and responsibilities in formulating policies and supervising internal control and risk management systems to support effective anti-corruption and implant as the Company's culture.
8. The Audit Committee has duties and responsibilities to review financial and accounting reporting systems, internal control systems, and risk management systems to ensure that they meet international standards and are concise, appropriate, up-to-date, and efficient.
9. The audit unit has duties and responsibilities in auditing and verifying work operations to be in accordance with this policy and to ensure that there is an appropriate and adequate internal control system.
10. The executives have the duty and responsibility to establish a system promoting and supporting anticorruption. This includes guidelines for recruiting personnel to work with the Company, communicating to employees and all related parties, as well as reviewing the suitability of various systems and measures.

8. Gifts and Entertainment

Principle

Offering or receiving or promising to give any benefit in any kind or facilitating or providing entertainment to those related to the business must comply with local or national customs and traditions and applicable laws at a reasonable value.

Examples of Practice

1. Not to offer gifts, souvenirs, entertainment, or other benefits unless specified by law, customs and traditions in each locality. Approval from the authorized person as specified by the

Company's regulation is needed. In addition, it is necessary to ensure that such giving does not cause any conflict of interest or corruption, especially to government officials.

2. Not to receive gifts, souvenirs, entertainment, or other benefits. In case of not being in a position to refuse or it is necessary to accept it to maintain a good relationship, they must report to the supervisor immediately. The supervisor must use discretion, that it does not cause conflict of interest or corruption.
3. Not to offer discounts that are contrary to existing regulations. If a special discount is to be issued, it must be approved by the authorized person.
4. There must be evidence of expenditure indicating the asset's value, service, or entertainment for verification. Such reception must focus on the Company's benefit.
5. If unsure of the different practices in each area. Ask the supervisor before proceeding.

9. Political Operation

Principle

The Company respects the administrative regime in each area where the business is operated and supports employees in each area to behave under the administrative regime in different ways. The Company is politically neutral without concentrating on or giving any financial or other forms of support to any political party, political group, political authorities, or candidate for political election, directly or indirectly, and ready to support the government in various aspects as appropriate.

Examples of Practice

1. Avoid any actions of political expression that may cause others to misunderstand that they are the actions on behalf of the Company.
2. Not to dress in staff uniform or use any symbols that may misguide others to perceive you as the Company's employee for attending the political meeting or participating in public gatherings with political context.
3. Avoid expressing political opinions in the workplace or during work hours that may cause disharmony among employees.

10. Trade Competition

Principle

The Company adheres to fair trade competition by recognizing business ethics and trade competition laws.

Examples of Practice

1. Not making any agreements with competitors or any person that may reduce or limit trade competition, such as joining with others in bid pricing in the tender or price-fixing, etc.

2. Not making any agreement with others to jointly abstain from doing business with any customers or trade partner except in the case of sanction for international trade.
3. Trade competition law is complex. Therefore, any operations related to the competitors require consultation from legal units and responsible departments because there may be some uncertainties in interpretation and law enforcement.

11. Money Laundering

Principle

The Company adheres to the law relating to anti-money laundering and shall not accept transfer or alteration of assets or encourage the acceptance of transfer or alteration of assets regarding offense committing. To prevent anyone from using the Company as a means or a tool to divert, conceal, or cover up the source of illegally acquired assets.

Examples of Practice

1. Before entering into a transaction with a counterparty on behalf of the Company, the Company must carefully examine the counterparty's background that they are not committing money laundering offenses.
2. In case of detecting any disclosed transactions that may be subject to money laundering, they must immediately report to their supervisors, legal unit, or financial and accounting department.
3. When acting on behalf of the Company, not to accept payment in cash or cash equivalents without clear proof of payment or receipt.
4. When acting on behalf of the Company, payment must not be made to the non-signatory party or any person identified as a payee under the contract, or make payment through a person or via an unclear channel unless it complies with applicable laws such as legal execution, claiming right transfer, etc.

This shall be effective from February 1, 2024 onwards.



(Ms. Saowanee Khaoubol)

Deputy Chief Executive Officer / Acting Chief Executive Officer

Wow Factor Public Company Limited