



ZEN Corporation Group Public Company Limited

Code of Conduct

Of

Zen Corporation Group Public Company Limited and its subsidiaries

1. Scope

The Code of Conduct of Zen Corporation Group Public Company Limited (the Company”) applies to directors, executives, employees of the Company and its subsidiaries.

2. Policy

The Company has the policy to conduct business in a lawful manner and compliance with requirements to respect the rights of employees, business partners and all related groups of the Company and its subsidiaries.

3. The Company s Code of Conduct consists of:

3.1 Compliance with rules, regulations, notifications and orders of the Company and its subsidiaries

Directors, executives, all employees of the Company and its subsidiaries have duties and responsibilities to acknowledge, understand, and comply with the Code of Conduct, rules, regulations, notifications and orders of the Company and its subsidiaries and supervisors, as follows:

3.1.1. They shall support and strictly comply with the Company s and its subsidiaries policies, regulations, orders, agreements, notifications or circular letters;

3.1.2. They shall perform their duties with honesty and fairness, as well as reporting events that may cause damage to the Company s and its subsidiaries reputation and assets;

3.1.3. They shall be polite and respect colleagues;

3.1.4. They shall perform duties with determination and diligence and maintain regulations and good governance of the Company and its subsidiaries to be a good example make the company and its subsidiaries progress and operate in a proper manner;

3.1.5. They shall strictly maintain the interests and confidentiality of the Company, its subsidiaries and customers or in connection with any activity that must not be disclosed. Dissemination of news related to the business, finance, and individuals of the Company and its subsidiaries shall be done only in a proper and authorized manner and with prudence and efficiency. All related parties agree to

keep the above information confidential.

If such information is disclosed or sent to others or used for any matter other than performance of duties for the Company and its subsidiaries, a violator agrees to be responsible for a compensation of civil damages to the Company and its subsidiaries in all respects;

3.1.6. They shall maintain and prevent the Company and its subsidiaries' assets from being damaged or lost, either from an individual or from any disaster, as far as possible;

3.1.7. They shall conduct management by adhering to morality and ethics, enhances morality and ethics at all levels of the Company and its subsidiaries, and monitor and resolve conflicts of interest that may arise in the Company and its subsidiaries by taking the benefits of the Company and its subsidiaries as a priority;

3.1.8. They shall supervise subordinates closely without prejudice or bias;

3.1.9. They shall prepare to work as a team and be open-minded to others' opinions;

3.1.10. They shall comply with and support and supervise all employees to strictly comply with the rules, disciplines and regulations of the Company and its subsidiaries for using computer systems, computer data, computer traffic information of the Company and its subsidiaries to make the use of computers of the Company and its subsidiaries efficiently and in accordance with the computer law, copyright law, Personal Data Protection Act, or other applicable law, and prevent damage to the reputation and image of the Company and its subsidiaries or subject to civil and/or criminal prosecution.

3.2 Restrictions

Directors, executives, and all employees of the Company and its subsidiaries should refrain from performing or behaving in a manner that may lead to the detriment of the Company, its subsidiaries and themselves.

3.2.1. They shall not spend time working for the Company and its subsidiaries to do something else or take personal advantage;

3.2.2. They shall not operate a business of the same condition and in competition with the business of the Company and its subsidiaries, whether it is for personal gain or for others, or being a shareholder with management dominance which may damage the Company and its subsidiaries, either directly or indirectly;

3.2.3. They shall not behave in a manner which may damage the Company's and its subsidiaries' position and honor;

3.2.4. They shall not be deliberately or with the intention of making or using false statements or conceal any fact that should be reported to the Company and its subsidiaries;

3.2.5. They shall not work with negligence or perform any act which is inappropriate for the performance of their duties;

3.2.6. They shall not conceal or misrepresent any fact in order to obtain benefits of themselves or others, which may damage to the Company and its subsidiaries, either directly or indirectly;

3.2.7. They shall not prevent or take any action that impedes the legitimate performance of authorized personnel in the Company and its subsidiaries or issue any order for employees to act in a wrongful or unethical manner;

3.2.8. They shall not engage in any breach of civil and/or criminal law that will harm themselves or others, including the Company and its subsidiaries, whether on purpose or not;

3.2.9. They shall not disclose their own or others wages or salaries, rates of salary increase, whether on purpose or not;

3.2.10. They shall not ask for or agree to receive property or any other benefit from business partners, competitors or any other persons engaging in business with the Company and its subsidiaries or a reception that proves to be more than appropriate, except for traditional gifts or normal business entertainment or business promotion expenses that bring a reputation for trade for exchange according to custom. In case that those items or benefits are worth more than 3,000 baht, they must immediately notify their supervisor at the Department- Director level or higher.

3.2.11. They shall not give a bribe and/or perform any acts that cause damage to the Company and its subsidiaries and/or corruption, either directly or through a third party, and/or misrepresent their influence and/or authority on a business partner's agent, which constitutes a conflict of the Company's and its subsidiaries policy;

3.2.12. They shall not add, remove or amend any records or information in any way in order to change, alter or distort financial positions or performance of the Company and its subsidiaries and to misrepresent their accounting record status for any purpose;

3.2.13. They shall not be a person with insolvency or for any reason under the law to be presumed to be insolvent and/or ordered by the court to be bankrupt under the law;

3.2.14. They shall not perform any act that fails to protect the intellectual property information of the Company and its subsidiaries or obtained from performance of duties of employees. In addition, the intellectual property of the Company and its subsidiaries shall not be reproduced, adapted or used for personal benefit or for the benefit of others without permission from the Company and its subsidiaries;

3.2.15. They shall not imitate the Company's and its subsidiaries' performance and intellectual property and/or of others for their own benefit or others;

3.2.16 They shall not perform any act which is wrongful exploitation for themselves or others;

3.2.17. They shall not solicit or ask for support from a business partner (if it is necessary to seek such support for the benefit of the Company and its subsidiaries, departments shall consult with a purchasing agency to be responsible for the implementation);

3.2.18 They shall not perform any act which facilitates any person to seek, benefit, or access or disrupt the computer system, computer data, traffic computer information of the Company and its subsidiaries without authorization or permission from the Company and its subsidiaries, or intentionally encourage, support, or allow it to occur or exist in the course of an act of service provider under the computer law, copyright law, Personal Data Protection Act, and other relevant laws;

3.2.19. They shall not buy, sell, transfer, and receive the Company's and its subsidiaries securities by leveraging inside information that has not yet been disclosed for the benefit of themselves or others;

3.2.20. They shall not bring any items, equipment or assets of the Company and its subsidiaries for personal gain or for the benefit of others

4. Code of Conduct Punishment

Any persons accused of violating or failing to comply with this Code of Conduct shall be subject to punishment according to their level of one or several offenses and the Company's and its subsidiaries Regulations

In this regard, a supervisor or the Disciplinary Committee shall have the power to consider punishment under this Notification. For the punishment in the event of serious disciplinary offenses or punishment from suspension, the punishment shall be considered by the Disciplinary Committee only.

Code of Conduct be effective from 11 November 2022 with the approval of the Board of Directors in the Meeting 8/2022.

(Mr. Paitoon Thawiphon)

Chairman of the Board of Directors