



Code of Conduct

Guidelines



MUANGTHAI CAPITAL PUBLIC COMPANY LIMITED

332/1 Jaransanitwong Road, Bangplad, Bangplad, Bangkok Thailand 10700 Tel. +662 483 8888

Introduction

Muangthai Capital Public Company Limited and its subsidiaries have been dedicated to managing and operating the business with due regard to social responsibility and stakeholders such as shareholders, investors, creditors, customers, employees, vendors, competitors, regulators, communities, and society, including environmental responsibility. This is to create sustainability in the business and to ensure steady growth while being socially and internationally accepted.

This Code of Conduct serves as a practical guideline for directors, executives, and all employees to understand the standards which the Company adheres to when operating the business and to reflect its intentions with transparency, ethics, and responsibility toward stakeholders, considering society and the environment. This ensures that all are able to follow the practices in the same direction, in line with good Corporate Governance principles and this Code of Conduct of the Company.

INTIMATE SERVICES LIKE CLOSED FAMILY MEMBERS



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Category 1 : General Information

1.1 Objectives

1. Muangthai Capital Public Company Limited (“the Company”) and its subsidiaries have been dedicated to managing and operating business with due regard to social responsibility and stakeholders to create sustainability in business and be able to manage the business to grow steadily and be socially and internationally accepted.
2. To encourage directors, executives and employees of the Company to have knowledge and understanding on business Code of Conduct. It adheres to transparency, fairness, verifiability and operates business ethically following regulations and relevant laws as well as economic, social and environmental responsibilities. This is to be guidelines for operational framework and practices toward all stakeholders.
3. To ensure the stakeholders that the Company fairly adheres to all stakeholders considering the benefits and impacts of business operations on the stakeholders related to the Company.
4. To ensure that the Company has been responsible for and monitored the compliance with Code of Conduct strictly following the principles of Good Corporate Governance.

1.2 Importance of Code of Conduct

The Company is dedicated to managing and operating business with due regard to social responsibility and stakeholders such as customers, shareholders/investors/creditors, employees, vendors, competitors, regulators and community/society as well as environmental responsibility. This is to create sustainability in business and able to manage the business to grow steadily and be accepted in society as well as to be able to generate returns to shareholders efficiently considering the benefits and impacts of business operations on stakeholders related to the Company. The focus is on all stakeholders and environmental responsibility. The Company stipulates Code of Conduct in writing for practice and disseminating to directors, executives and all employees to understand the standards of business code and practice following the principles of Good Corporate Governance to show the intention to conduct business with transparency, ethic and responsibility to stakeholders considering society and environment.

1.3 Definition of Words

Code of Conduct	The Company’s practical guidelines are aligned with the principles of Good Corporate Governance to encourage personnel to operate the business transparently, ethically, and with accountability, while taking responsibility for stakeholders, society, and the environment. This reflects the Company’s commitment to an ethical framework and social responsibility, which enhances both the business and society, allowing them to grow sustainably together.
Ethic	To practice following the tradition, culture, morals to be accepted in society



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Principles of Good Corporate Governance	The fundamental principles of Corporate Governance are established as guidelines to ensure consistent practices, such as integrity, fairness, transparency, responsibility, and accountability.
Good Governance	A guideline for social decoration with peace and justice in society
Stakeholders	Divided into seven groups: customers, shareholders/investors/creditors, employees, vendors, competitors, regulators and community/society
The Company	Muangthai Capital Public Company Limited
Board of Directors	The directors of Muangthai Capital Public Company Limited
Executives	The executives and the Management of Muangthai Capital Public Company Limited
Employees	Employees of Muangthai Capital Public Company Limited and its subsidiaries including regular employees and contract employees
Investor	Divided into four groups: (1) Institutional Investors, (2) Ultra High Net Worth Investors, (3) High Net Worth Investors, and (4) Retail Investors who have transactions with the Company. The financial status of Ultra High Net Worth Investors and High Net Worth Investors must meet the criteria prescribed by the SEC to ensure they are capable of handling risks and accessing investment products with risk and complexity.
Asset	Both tangible and intangible assets, as well as confidential information that is not publicly disclosed, such as business plans, financial data, human resources information, and debtor details.
Bribery	Money, asset or gifts given for personal benefits
Corruption	Refers to the wrongful use of authority and duties to obtain undeserved benefits, such as giving gifts or services, offering cash or items instead of cash, bribing government officials, and engaging in corruption between private entities. This includes offering pledges, conflicts of interest, concealment of facts, or any other benefits that contradict morals and good ethics, which are inappropriate for government officers, government agencies, private entities, or anyone with duties—whether directly or indirectly—who acts or refrains from acting to obtain or maintain improper business interests for personal gain, or for the benefit of family and friends, except where permitted by laws, regulations, announcements, local customs, or trade practices.

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Category 2 : Code of Conduct

2.1 Code of Conduct Guidelines

The Company is dedicated to managing and operating its business with due regard to social responsibility and stakeholders. This is to create sustainability in business and enable the business to grow steadily, be socially and internationally accepted, and generate returns to shareholders efficiently, considering the benefits and impacts of business operations on stakeholders related to the Company. The main focus is on social responsibility. The Board of Directors adheres to correct and fair business operations by stipulating the Code of Conduct in writing for practice and disseminating it to directors, executives, and all employees to ensure understanding of the standards. The business code that the Company uses in its operations provides practical guidelines to demonstrate the intention to conduct business with transparency, ethics, and responsibility to stakeholders, considering society and the environment through training and communication within the organization in various forms. The Code of Conduct reflects the values and serves as a guideline that all employees must follow. They are required to adhere to the Code of Conduct set forth in various fields and to ensure compliance with the mentioned guidelines.

2.2 Business Operation with Fairness

1. The Company establishes policies and guidelines for customer service by clearly and fairly notifying conditions to customers. Advice is also provided to help customers with politeness and gentleness, listening to their problems and suggesting solutions without disclosing customer secrets.
2. The Company treats vendors and creditors fairly and equitably, without taking advantage, complying with trade conditions and/or contractual agreements made strictly, in order to develop business relationships that benefit both parties.
3. The Company treats competitors fairly, without engaging in actions that might attack, sabotage, or damage the reputation of competitors, including the use of misleading publicity. Operations will be conducted under fair competition, without resorting to tactics aimed at destroying competitors.
4. The Company's business operations must be managed to grow sustainably and stably, as well as disclosing information with transparency and fairness, through careful operation and honesty with related parties.
5. The Company does not seek competitors' confidential information through dishonest means or inappropriate methods, such as bribing competitors' employees.

2.3 Human Rights and Labor Practices Policy

The Company will not commit any violation of human rights in any business activity, recognizing the importance of equality among people by neither violating human rights nor discriminating based on origin, race, gender, age, education, disability, economic and social status, or political opinion. In addition to respecting fundamental human rights, the Company, including customers, vendors, and all stakeholders in the business value chain, is dedicated to complying with international labor practice guidelines and Thai labor laws. Therefore, it is appropriate to set policies and guidelines on human rights and labor practices as follows:



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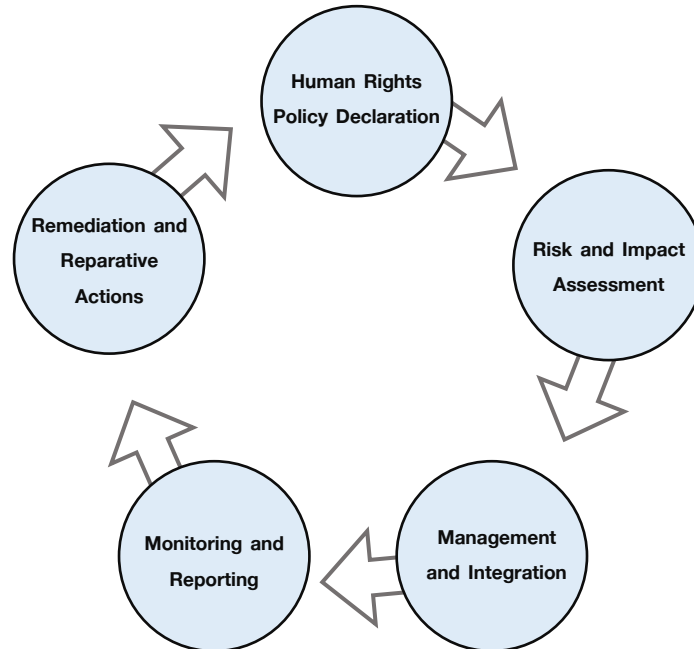
1. The Company values and respects human rights by treating all individuals or groups of people, including stakeholders, with equality, without distinction based on physical or mental attributes, race, religion, gender, language, age, skin color, education, social status, culture, customs, political views, or any other factors.
2. The Company will not violate the rights or freedoms of any person or group, whether directly or indirectly. This includes prohibiting physical harassment, verbal abuse, intimidation, humiliation, sexual harassment, or any other form of discrimination.
3. The Company is committed to performing its duties with care to prevent any risks of infringing upon human rights in all business activities.
4. The Company will not employ or support vendors who use illegal labor in any form, including child labor or other forms of illegal employment.
5. The Company provides clear communication channels and disseminates its human rights policy to all stakeholders within the business value chain, ensuring that everyone is aware of and engages in business operations that respect human rights as outlined in this policy.
6. The Company values the rights and freedoms of communities, believing that a strong and healthy community is foundational to a country's economic development. It is committed to sustainably supporting and promoting community well-being through various projects.
7. The Company ensures the protection of human rights at each stage of its operations and takes immediate action against any violation. Employees are encouraged to report any human rights violations to their supervisor or the designated individual in charge. The Company has a process in place to protect whistleblowers and complainants, as prescribed in the whistleblowing policy. All complaints are forwarded directly to the Chairman of the Audit Committee.
8. The Company aims to foster an organizational culture that upholds respect for human rights. Employees are encouraged to live and work in a harmonious and accepting environment. This culture is reflected in the Company's commitment to providing high-standard services to all stakeholders with equality.
9. The Company conducts assessments to identify risks and potential human rights violations, enabling it to plan and implement corrective and preventive measures.
10. The Company imposes penalties on those who violate human rights, with the highest penalty being the termination of employment.
11. The Company provides appropriate remediation for individuals affected by human rights violations, which may include both monetary and non-monetary forms of compensation, as well as consulting and guidance for the victims.
12. The Company is committed to preventing all forms of assault, sexual harassment, verbal abuse, and psychological abuse. It actively fosters a corporate culture that respects human dignity.
13. The Company adheres to the principles of responsible business operations to prevent negative impacts on communities, society, and all groups of stakeholders throughout the Company's business value chain.



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Procedure of Examination on Human Rights and Labor Practices of Muangthai Capital Public Company Limited and Its Subsidiaries



The Company diligently adheres to the framework of human rights operations based on the principles of the UN Guiding Principles on Business and Human Rights (UNGPs) to demonstrate its commitment to social and stakeholder responsibility regarding human rights as a business entity. Human Rights Due Diligence (HRDD) has been conducted, covering a comprehensive assessment of every issue throughout the value chain. The Company asserts its stance by declaring a clear organizational human rights policy to both internal personnel and the public, along with continuous education provided to employees. Procedures are in place for prevention, mitigation, and remediation in the case of human rights violations, including complaint mechanisms. Measures for respecting and protecting human rights are integrated at every stage of business operations, with continuous monitoring and reporting of outcomes. Additionally, the Company consistently discloses its human rights performance according to internationally recognized reporting standards annually.

2.4 Intellectual Property Policy

The Company operates its business in compliance with intellectual property laws, with a policy not to support any action that infringes intellectual property, such as the use of pirated software. The Company's work system must be licensed and legally copyrighted, and employees are prohibited from installing pirated software on the Company's computer systems. In addition, directors, executives, and employees are prohibited from disclosing information and must maintain confidentiality, such as financial information, ideas, and techniques related to the Company's business operations or its subsidiaries, which are intellectual property of the Company and/or its subsidiaries, regardless of whether they have been legally registered under intellectual property law. Hence, such information is prohibited from being disclosed without written permission from the Company or an authorized person.



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Guidelines for Directors, Executives and Employees

1. Promote and comply with intellectual property rights, copyrights, patents, and moral rights strictly, including encouraging the effective use of the Company's resources and assets to enhance its ability to compete and provide excellent service to customers. The Company promotes the use of only legally copyrighted products and services and does not support products or actions that infringe on intellectual property.
2. The Company does not support actions that violate intellectual property rights. Any software used in the Company's work system must be authorized and legally copyrighted.
3. Employees must comply with all laws, regulations, and contractual obligations regarding valid intellectual property rights, including patents, copyrights, trade secrets, and other proprietary information, without violating the intellectual property rights of others.
4. Employees who bring works or information belonging to third parties into the Company must review them to ensure they do not infringe on the intellectual property rights of others.
5. Employees who use the Company's computers must use software in accordance with the copyright owner's license and only those authorized to use the Company's software.
6. Upon termination of employment, all intellectual property, including works, must be returned to the Company, regardless of the data stored in any form.

2.5 Anti-Corruption Policy

Anti-corruption is prioritized with the declaration of the anti-corruption intention on 20th November 2017, in cooperating with the Thai Collective Action Against Corruption (Thai CAC). The Board of Directors has announced the anti-corruption policy for directors, executives and all employees to comply with the policy in general by communicating with executives and employees through the Company's Intranet (MTCU) and internal newsletters and specifying the details in the good Corporate Governance guidelines, including such topics in training of new employees.

The Company recognizes that corruption has a negative effect and is an obstacle to the social and economic development of the country. It is a harmful business practice that causes unfair competition, which will negatively affect the reputation of the Company in terms of business ethics and competitiveness, and is not universally accepted. It also erodes the confidence of shareholders, investors, and all stakeholders in the organization. Therefore, the Company regards it as an important principle in operating the business not to support businesses, groups of people, or individuals involved in pursuing undesirable benefits, whether directly or indirectly, from the abuse of authority. The Company is also ready to cooperate with the government, private sectors, the media, and international organizations to demonstrate its commitment to fighting against all forms of corruption. The Board of Directors has resolved to approve the Company's anti-corruption policy and measures, using the guidelines of official agencies, including the "Coalition of Thailand's Private Sector Collective Action against Corruption," whereby the Company sets guidelines and operates with transparency to establish clear business conduct standards. These guidelines must be strictly adhered to by all directors, executives, and employees as follows:



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1. Directors, executives, and employees of the Company are prohibited from performing, accepting, or supporting corruption in any form, directly or indirectly, including within its subsidiaries, other companies that the Company controls, business partners, and persons who act as intermediaries or representatives of the Company.
2. Arrange for a corruption risk assessment in various business activities to identify high-risk areas and potential impacts, as well as to determine effective measures to prevent or reduce risks. This includes monitoring and evaluation, which are considered part of business operations. Directors, executives, and employees at all levels must actively participate in promoting and supporting these practices, controlling, following up, and reporting results to develop anti-corruption measures that align with the policy.
3. Provide written guidelines or measures against corruption that are consistent with the results of the corruption risk assessment in various business activities, in compliance with Thailand's anti-corruption laws.
4. As the Company places high importance on preventing the risk of corruption, it does not employ government officers to perform duties on behalf of the Company.
5. Establish an efficient and appropriate internal control system for activities that may involve the risk of corruption. Directors, executives, and employees at all levels must exercise caution in the following matters.

- **Political Contributions:** The Company and its subsidiaries do not have a policy to engage in financial assistance or any other form of support for political activities, such as providing loans, donations, etc. Other forms of assistance include giving items or services, political engagement advertising, purchasing tickets to attend events organized for fundraising, or making donations to political parties, granting employees leave, or acting as Company representatives to participate in political campaigns, as well as any inappropriate actions or actions that contradict constitutional law in order to gain a business advantage or benefit from business activities.

The Company has a policy of being politically neutral. In the event that the Company wishes to provide political support to promote democracy, such support shall not be contrary to applicable law and must be properly recorded. There must be evidence and procedural approval for later investigation. The Company supports the exercise of voting rights at both the local and national levels. This is an important right and responsibility in a democracy.

- **Sponsorships and Charitable Donations:** Donations or financial support are part of Corporate Social Responsibility, as well as enhancing the good image of the Company without expecting business results in return. They must be transparent and legitimate, ensuring that the donation is not used as an excuse for corruption. Sponsorships and charitable donations must be properly recorded. There must be evidence and approval according to the Company's disbursement process for later investigation.

6. Directors, executives, and employees must not ask for, demand, or give things or any other benefits to those who have duties related to the Company, unless it is in the context of providing or accepting local



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customs, business practices, traditions, or trade customs. The value should not exceed the limit specified by the Company and must follow the regulations regarding the giving or receiving of gifts and hospitality.

7. Do not give or accept bribes in any form of business, either directly or through third parties, including subsidiaries, associated companies, other companies controlled by the Company, partnerships, and individuals acting as intermediaries. Additionally, interactions with the government must be transparent, honest, and legal.
8. Personnel of the Company and its subsidiaries must not engage in acts of extortion, fraud, deception, conspiracy, collusion, embezzlement, money laundering, cybercrime, or any other similar activities. This also includes theft for personal gain.
9. Procurement must be transparent, honest, and legal, in accordance with government regulations and the Company's procurement policy.
10. Compensation arising from sales promotions or trade discounts, whether in money or valuable assets, should follow normal business practices without any improper intent. It must not be a bribe to obtain a business agreement and must not be given for the benefit of any individual, except when giving and receiving benefits that do not contradict the anti-corruption policy. Clear documentation of receipts must be maintained for verification.
11. The Company provides continuous communication and training to directors, executives, employees, subsidiaries, associated companies, and other companies under the Company's control to promote knowledge on anti-corruption. The Company has the right to control the activities of agents, commercial institutions, and individuals in all fields, fostering a corporate culture that is free from corruption. This includes being honest and responsible in performing duties, with detailed procedures and penalties for non-compliance with anti-corruption measures.
12. This policy applies to personnel management processes, including recruitment, selection, orientation, training, performance evaluation, promotion, rewards, and penalties. It reflects the Company's commitment to anti-corruption by requiring supervisors at all levels to communicate this policy to employees within their responsibilities and to supervise its effective implementation.
13. The Company has a policy to protect employees at all levels who refuse to engage in corruption. They will not be penalized or adversely affected, even if their refusal results in the Company losing business opportunities.
14. Provide multiple secure communication channels that employees and related parties can access for advice on the implementation of anti-corruption measures. Employees should be able to provide information, clues, or make complaints confidently, without risk to the whistleblower. The Company must also have an audit process in place and take appropriate actions.
15. The Company has procedures for keeping documents for inspection, including recording financial statements with sufficient evidence. None of the items should be omitted, unexplainable, or falsely recorded. There is a transparent and fair financial reporting mechanism, along with an audit process of internal controls to ensure the effectiveness of the accounting process and data retention.



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16. Those who commit acts of corruption are in violation of the Company's Code of Conduct. Disciplinary action will be taken in accordance with the Company's regulations and may include legal penalties if the act is unlawful.
17. The Company has authorized Management with the responsibility of formulating guidelines and following up to ensure compliance with anti-corruption measures. It will also organize the structure and allocate resources in alignment with the implementation of anti-corruption measures.
18. The Company has a policy to disclose and share internal policies, experiences, good practices, and guidelines for supporting ethical business practices, ensuring accuracy and transparency in Thailand. It also has a policy to cooperate with other companies in the same industry, partners, and stakeholders, fostering common practices and participation in anti-corruption activities.

Such policies and measures are publicly disclosed on the Company's website.

<https://investor.muangthaicap.com/storage/document/policies/mtc-anti-corruption-policy-en.pdf>

2.6 Anti-Money Laundering and Counter-Terrorism and Proliferation of Weapon of Mass Destruction Financing (AML/CTPF) Policy

The Company aims to prevent becoming a source of money laundering and the financing of terrorism, which could impact the Company's reputation and stability. Therefore, it is important to comply with the laws of Anti-Money Laundering and Counter-Terrorism and Proliferation of Weapons of Mass Destruction Financing (AML/CTPF), as well as the laws and principles of the Bank of Thailand (BOT) and other relevant laws.

The AML/CTPF policy is stipulated as a practical guideline for directors, executives, and employees of the Company and its subsidiaries to operate the business correctly. The main guidelines are as follows:

1. The Company has a risk management policy, risk assessment procedures, and effective risk mitigation measures related to AML/CTPF activities, which include risks associated with customer types, loan and service products, high-risk service areas, and the utilization of information technology.
2. Know-Your-Customer (KYC) Policy: The Company will proceed in accordance with the regulations and procedures related to KYC and will store the KYC records of every customer used in the loan issuance process.
3. Client Due Diligence (CDD) Policy: The Company will proceed in accordance with the regulations and procedures related to CDD, as outlined in the following procedures:
 - 3.1 Identify and verify the customer.
 - 3.2 Cross-check the customer data against ALMO's "List of Designated Persons."
 - 3.3 Establish the customer's transaction and data monitoring to maintain up-to-date information.
 - 3.4 Assess each customer's risk based on their type (e.g., occupation, use of funds) as well as their areas of residency.
4. Customer Denial and Termination in cases where the customer meets any of the following conditions:
 - 4.1 The customer is on ALMO's "List of Designated Persons."
 - 4.2 The customer conceals, falsifies, or provides false information regarding their real name and documents.



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- 4.3 The customer fails to provide sufficient information or evidence for identification.
- 4.4 The customer could potentially increase the Company's risk related to AML/CTPF activities.
- 4.5 The Company must suspend all financial transactions for customers on ALMO's list of designated persons to prevent AML/CTPF activities. If a previous or existing customer is found on ALMO's list of designated persons, the Company has a responsibility to report this to ALMO immediately.
5. The Company is responsible for monitoring the customer's use of loans to ensure they are not related to AML/CTPF activities or benefiting an individual listed on ALMO's designated persons list. If such a link is found, the Company must report it to ALMO within 7 days.
6. Use of Technology to Verify Customer Information: The Company utilizes technology to access sufficient data to verify customer information and ensure its accuracy in compliance with regulations, such as identifying individuals listed on ALMO's "List of Designated Persons" or the UN's list of terrorists.
7. Management of AML/CTPF Risk: The Company has established measures to assess risks related to AML/CTPF in compliance with applicable regulations and global standards. These measures are designed to effectively prevent and mitigate the Company's exposure to AML/CTPF activities.

Additionally, the Company regularly reviews and revises customer data, particularly for high-risk customers. If necessary, customer-related transactions will be suspended immediately.
8. The Company stores all reports submitted to ALMO, as well as customer identity verification documents and any other required documentation in accordance with regulations.

The Company has stipulated regulations, disciplines, and practical guidelines based on the Company's criteria. These are regularly reviewed and improved to ensure they are up to date and serve as guidelines for employees to achieve the goals set by the policy. Employees are required to be trained in AML/CTPF knowledge sufficiently and continuously, as assigned by the Company. Hence, there are monitoring procedures and examinations of customers' bank account transactions conducted frequently until the business relationship is terminated as prescribed by law, to assess whether customers' transactions are related to their occupations and source of income, as notified to the Company.

The details of AML/CTPF policy are publicly disclosed on the Company's website.

<https://investor.muangthaicap.com/storage/document/policies/mtc-cg-antimoney-laundering-en.pdf>

2.7 Whistleblowing Policy

The Company recognizes the importance of strengthening the relationship and understanding between all stakeholders, as well as those affected by the Company's operations. They can report complaints or provide information to the Company if they observe, know, have questions, or have reasonable grounds to believe in good faith that the Company or its employees have acted in violation of, or failed to comply with, the law, rules and regulations of good Corporate Governance, the Code of Conduct, policies, and procedures that may cause damage to the Company.



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Channels for Complaint and Whistleblowing

1. Call Center (+66) 2-483-8888 or 1455
2. By E-mail : whistleblower@muangthaicap.com
3. By filling a whistleblowing form on the Company's website
4. By post to the following address:
Mrs. Kongkaew Piamduaytham
Chairman of the Audit Committee,
Muangthai Capital Public Company Limited, 332/1 Jaransanitwong Road,
Bangplad, Bangkok 10700
5. Telephone to the Whistleblowing Department about fraud or corruption and incompliance with the policies and disciplines
(+66) 81-751-1587
6. Use of personal information without consent from an owner. Whistleblowers can send the complaints to the Data Protection Officer (DPO) via
E-mail : dpo@muangthaicap.com

Scope of Whistleblowing or Complaints

1. Illegal acts that violate the policy/principles of good Corporate Governance or the Company's Code of Conduct.
2. Behavior that may lead to corruption or misconduct aimed at seeking unlawful benefits for oneself and/or others, such as corruption, embezzlement, fraud, etc.
3. Violations of rules, regulations, or the Company's Articles of Association.
4. Exposure to unfair practices in the performance of work or the discovery of a defective internal control system within the Company that could potentially serve as a channel for corruption or cause the Company to lose benefits.

Whistleblowing and Complaint Considerations and Terms

1. The information received will be treated as confidential, and the whistleblower's identity will not be publicly disclosed without consent.
2. The details of the whistleblowing or complaints must be true, clear, and sufficient to facilitate an investigation into the facts for further action.
3. The response time to the whistleblower should not exceed three days after receiving the whistleblowing report.
4. The timeline for processing complaints depends on the complexity of the matter, the adequacy of documents, and the evidence received from the whistleblower, including documentary evidence and explanations. However, it will not exceed 30 business days.
5. Whistleblowers, whether employees or external parties, will be entitled to protection.
6. The complaint receiver and those involved in the investigation process must maintain confidentiality regarding relevant information, which will only be disclosed when necessary, considering the safety of the whistleblower, those cooperating in the investigation, or related persons.



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Whistleblower and Complainant Protection Measures

1. The Company will keep the information and identity of the whistleblower or complainant confidential.
2. The Company will disclose information only as necessary, considering the safety of the reporting person. Any damage to the source of information or involved individuals will be mitigated through appropriate and fair procedures.
3. The Company will not treat the whistleblower unfairly, including by changing their job position, job description, workplace, suspending, intimidating, interfering, laying off, or taking any other action that is unfair to the whistleblower or those who cooperate in the investigation.
4. In the event of complaints or for those cooperating in the investigation of facts, the individual may request that the Company implement appropriate protection measures. Alternatively, the Company may impose protection measures on the complainant or individuals cooperating in the investigation if there is a risk of harm or insecurity, even without a request.

Whistleblowing and Complaint Process

1. Registration and Transfer

The complaint coordinator registers whistleblowing and complaints, scheduling a date to inform the complainant of the progress, as follows:

- In cases where there is a hazardous impact on the Company's reputation, it must be managed as soon as possible.
- Other cases must be handled promptly. The complaint coordinator is responsible for receiving complaints and recording the complainant's information, including the following details:
 - 1) Name of the complainant, except for anonymous complaints
 - 2) Complaint date
 - 3) Name of the person or case involved
- Other relevant information when registering a complaint: The confidentiality level should be classified based on the content of the issue, and the following steps should be taken:
 - 1) Send the complaint to the complaint officer to investigate the facts and take action according to their authority.
 - 2) Send a copy of the complaint to the Human Resources Department for initial awareness, in order to prepare advice on disciplinary actions or other matters.
 - 3) Send a copy of the complaint to the Chairman of the Executive Committee and the Managing Director for their awareness.

2. Fact gathering and instruction

- The complaint officer investigates the facts and provides recommendations to the concerned parties to ensure proper conduct and actions. If disciplinary action is required, the officer should consult with the Human Resources Department to ensure that the punishment aligns with the Company's regulations. If the complaint officer does not have the authority to impose punishment, the matter should be escalated to the appropriate authority step by step. The facts, actions taken,



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and any imposed punishment should then be sent to the Chairman of the Executive Committee and the Managing Director through the relevant supervisors for awareness or further action.

- If, after investigating the facts, the complaint officer finds that the accused party is not at fault, the matter was a misunderstanding, or recommendations have already been provided to the accused or related parties for appropriate conduct, and it is deemed that no punishment is necessary, the complaint officer should propose closing the matter to the immediate superior for approval. A copy of the matter should also be sent to the complaint coordinator to notify the complainant.
- In the case of an anonymous complaint where insufficient information can be obtained, the complaint officer should submit a report on the investigation and their opinion on the complaint to the Chairman of the Executive Committee or the Managing Director through the relevant supervisors, seeking guidance on the appropriate course of action. If the Chairman or Managing Director deems that the complaint cannot be addressed, the matter will be closed, and the complaint officer should send a copy to the complaint coordinator for notification.

3. Fact investigation

- In cases where the complaint officer and the Human Resources Department determine that disciplinary action is necessary, the Human Resources Department shall present the matter to the Chairman of the Executive Committee and the Managing Director for further investigation of the facts.
- Once the Chairman of the Executive Committee and the Managing Director have issued their decision, the result should be communicated to the complaint officer to proceed with the next steps.

4. Result and improvement

- The complaint officer shall act according to the instructions of the Chairman of the Executive Committee and the Managing Director, providing recommendations for appropriate conduct and actions. The complaint officer should also notify the complaint coordinator of the results of the actions taken.
- The complaint coordinator shall inform the complainant of the results of the actions taken and record the outcome of the process related to the complaint. This information should be presented to the Executive Committee on a quarterly basis.
- The complaint coordinator shall follow up on the progress of any corrective actions (if applicable) and report the results to the Chairman of the Executive Committee and the Managing Director.

Complaints or Whistleblowing in Bad Faith

If complaints or whistleblowing are acts of dishonesty or involve reporting false information due to intentional misrepresentation of facts or defamation of others, and if the individual is an employee, the Company will consider this a violation of the Company's Code of Conduct, subject to penalties. If such actions cause damage to the Company, the Company will consider taking legal action.



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The details of Whistleblowing Policy are publicly disclosed on the Company's website.

<https://investor.muangthaicap.com/storage/document/policies/mtls-cg-whistle-blowing-en.pdf>

If there are complaints, the Whistleblowing Department will report to the Board of Directors during meetings, providing updates on the progress of complaint handling. This includes both complaints that are still under investigation and those that have already been resolved, at least once each quarter. The Board of Directors shall receive an overview of the various types of complaints reported for that year, as well as an overview of complaints reported for the previous year, at the first Board meeting of the year.

2.8 Conflict of Interest Prevention Policy

● Prevention on the Transactions that may cause Conflict of Interest

Directors, executives, and employees of the Company must avoid any action that may create a conflict of interest, either directly or indirectly, whether arising from contact with business-related parties of the Company, such as vendors, customers, competitors, or from the use of opportunities, assets, or information obtained through their positions, authorities, and duties to seek personal benefits or benefits for others. This applies whether such actions will result in damage to the Company, either directly or indirectly.

The Company stipulates a policy that does not allow directors, executives, and employees, including those related to such persons, to seek personal benefits that conflict with the Company's interests. They should avoid actions that cause conflicts of interest. Those involved in or with an interest in the items under consideration have a duty to notify the Company of their relationship or connection to the transaction. The said person should not participate in any decisions related to the transaction.

The Company requires its directors and top executives to report the securities held by their spouses to the Stock Exchange of Thailand and the Securities and Exchange Commission under Section 59, as well as comply with penalties under the Securities and Exchange Act B.E. 2535 (1992). This ensures guidelines for performing duties with honesty, not seeking personal benefits that conflict with the Company's interests, and complying with relevant laws.

Guidelines for Directors, Executives and Employees

1. Disclose and submit information regarding personal and related interests to the Board of Directors prior to any transaction. The Company has stipulated that the Company Secretary is responsible for conducting an annual review of the list of stakeholders and transactions with potential conflicts of interest. This review will include directors, executives, related parties, and employees, and the information will be presented to the Audit Committee and acknowledged by the Board of Directors at least once per year.
2. Avoid transactions that may create conflicts of interest with the Company or its subsidiaries. Directors, executives, and employees must refrain from engaging in transactions related to themselves and/or related persons, and must not act in a way that conflicts with the interests of the Company or its subsidiaries, or seek personal benefits for themselves or related persons.
3. Directors, executives, and employees of the Company, including sub-committees, who have interests in any agenda item must not attend the meeting or participate in expressing opinions or approving the agenda related to matters in which they or related persons have a direct or indirect conflict of interest.



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This includes any financial or other benefits that are beyond what is normally expected, or any actions that could harm the Company or its subsidiaries. If such actions occur, they are considered to be contrary to the interests of the Company and its significant subsidiaries.

- (a) Transactions between the Company or its subsidiaries and the Company's directors, executives, or related persons that do not comply with the rules governing transactions with the Company's directors and related persons, or fail to adhere to relevant laws, announcements, including the policy on connected transactions and the Company's operational manual for entering into such transactions.
 - (b) Using the Company's or its subsidiaries' information for personal gain, unless the information is publicly available.
 - (c) Using the property or business opportunities of the Company or its subsidiaries in a manner that violates relevant laws, announcements, or regulations.
4. In the case of a normal transaction that follows standard trade agreements with general trading conditions, as a reasonable person would negotiate with a general counterparty in the same situation, and with bargaining power independent of the status of being a director, executive, or related person of the Company, as approved in principle by the Board of Directors, the Company shall prepare a summary report of such transactions for the Audit Committee and the Board of Directors for acknowledgment and comment on a quarterly basis, as such transactions occur.
5. For other transactions that are considered connected transactions but are not normal transactions, the Audit Committee must first review and provide opinions on the necessity of entering into the transaction and the appropriateness of the transaction price. These transactions will then proceed according to the rules governing legally connected transactions and related announcements.
6. The Company must ensure that both it and its subsidiaries have an effective internal control system, risk management system, and appropriate fraud and corruption prevention systems in place. These systems should be comprehensive enough to ensure that operations are conducted in accordance with the Company's policies, Articles of Association, relevant laws, and announcements.
7. The Board of Directors must oversee the Company and its subsidiaries to ensure compliance with relevant laws and ensure that information is disclosed according to the law and related announcements.
8. A clear work system should be established to ensure that subsidiaries have an adequate system in place for disclosing information on significant transactions, in line with established rules, on a continuous and reliable basis. Additionally, there should be a channel through which the Company's directors and management can access information from the subsidiaries to monitor operating results.
9. The Company stipulates that the Board of Directors and executives are defined according to the criteria set by the Office of the Securities and Exchange Commission (SEC) and the Stock Exchange of Thailand. They must report their interests, conflicts of interest, and those of related persons, which are relevant to the management of the Company or its subsidiaries. This must be done when they take office for the first time and whenever there are changes to their interest information. The report must follow the format approved by the Board of Directors and be submitted to the Chairman for review as soon as the changes

INTIMATE SERVICES LIKE CLOSED FAMILY MEMBERS



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are notified by the Company. This ensures compliance with the Securities and Exchange Act B.E. 2535 (1992) and helps in preventing conflicts of interest.

● Measures for Related Transaction or Related-Party Transactions Approval

The Company places significant importance on the prevention of conflicts of interest arising from related transactions or related-party transactions. In the approval process, the Company carefully considers potential conflicts of interest, honesty, fairness, and independence, all in accordance with moral ethics and the principles of good Corporate Governance. To ensure transparency, any transaction must be approved by the Board of Directors to prevent conflicts of interest. Therefore, the Company has established practices for the approval of connected or related-party transactions by the Board of Directors as follows:

1. Each director must disclose any information or transactions that could potentially lead to a conflict of interest, connected transactions, or related-party transactions, as required by the Securities and Exchange Commission (SEC) and the Stock Exchange of Thailand (SET).
2. Directors with a related interest are prohibited from participating in the approval process. In cases where connected transactions are conducted, the Audit Committee shall provide its opinion in accordance with the principles of good Corporate Governance and the regulations of the Stock Exchange of Thailand (SET).
3. Any loans or investments in businesses where a director has an interest must be approved by the Board of Directors, without the attendance of the interested director. To prevent conflicts of interest, the pricing, terms, and conditions must be determined in line with the Company's normal trading practices and the same terms given to general customers.

The Company has prioritized conflict of interest prevention policy. The Audit Committee of the Company has set practical guidelines for conflict of interest, monitored operational performance, and reported on the implementation of these guidelines to the Board of Directors every year. The guidelines must be approved at the meeting and shall be reviewed regularly to ensure that the control system is complete, standardized, and transparent. Management shall follow good Corporate Governance principles.

The Company has educated the directors, executives, and employees regarding the prevention of conflicts of interest, disseminated through the Company's intranet (MTCU), and has established regulations requiring all employees to read and study the policy and sign an acknowledgment that they will comply with it.

2.9 Internal Information Protection Policy of Securities Trading and Futures Contracts

The Company has established policies, a Code of Conduct, penalties, and has monitored the use of inside information in accordance with the law and good Corporate Governance principles. This includes the use of inside information and the trading of securities, as well as the sale of the Company's securities, to prevent directors, executives, and employees, including their spouses and underage children, from using inside information that has not been disclosed to the public improperly for their own benefit or the benefit of others. The policy requires that the Company's directors, management, and employees are prohibited from trading the Company's shares during the blackout period, which the Company has specified as 45 days.



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The Company attaches importance to the use of internal information by adhering to the principles of good Corporate Governance to ensure that investors receive reliable information equally and promptly. The Company establishes regulations for the use of inside information and securities trading by directors, executives, and employees in accordance with securities law. The Company aims for accuracy and transparency in its business operations and prevents directors, executives, and employees from using inside information for personal benefit or disclosing inside information to others, as well as adhering to the regulations of the Securities and Exchange Commission. Moreover, the Company's discipline includes penalties for the misuse of internal information for personal benefit. These penalties range from a warning to termination. The inside information policy is disclosed on the Company's Intranet (MTCU) and website for all stakeholders, directors, executives, and employees to be informed. The Company also requires all its insiders to sign their acknowledgment of compliance with the aforementioned policy. The details are communicated in the annual employee meeting of the Company and its subsidiaries as well. The key points can be summarized as follows:

1. Directors and executive directors must report all securities ownership issued by the Company, including those held by themselves, their spouse or cohabiting partner, and/or underage children, when holding the position of director or executive director. Additionally, they must report any changes in the ownership of the Company's securities to the Securities and Exchange Commission in accordance with Section 59 of the Securities and Exchange Act, within 3 business days from the date of purchase, sale, transfer, or receipt of transfer of the Company's securities.
2. Directors and executive directors, including their spouse and underage children, who have access to significant internal information that might affect the Company's stock price, are prohibited from trading or advising others to invest in the Company's shares during the 45-day period (Blackout Period) prior to the disclosure of the Company's financial statements or internal information to the public. After the public disclosure, and during any other period that the Company may specify from time to time, this restriction continues for 24 hours.
3. In the event that a director or executive director, including their spouse and underage children, wishes to trade the Company's securities, they must inform the Company Secretary at least 1 day prior to the transaction.
4. The Company is responsible for publicly announcing key decisions and/or actions in accordance with the rules and regulations set by The Stock Exchange of Thailand, using appropriate and acceptable media and channels.
5. The disclosure policy ensures that all investors receive information equally and promptly.
6. The Company's employees must maintain the confidentiality of its business activities and are prohibited from using undisclosed public information for personal gain or for the benefit of others, as well as from engaging in activities that may result in conflicts of interest.
7. The Company complies with all laws relating to insider trading.
8. Directors, executives, employees of the Company, and third parties performing duties who know or possess internal information about the Company must not misuse or disclose such information improperly.



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- 8.1 Ensure the internal information of the Company is kept secure and protected to prevent unauthorized disclosure or leakage to external parties.
- 8.2 Do not disclose the Company's inside information to individuals who are not involved in the operation. This is to prevent the misuse of inside information, whether for personal gain or for the benefit of others, as it may affect the price or value of the Company's securities, or those of related or listed companies, or may influence investment decisions.
9. Directors, executives, employees of the Company, and third parties who come to perform their duties and have access to inside information must not buy or sell securities based on that inside information, nor take advantage of others who trade securities without access to such information.
10. Directors, executives, employees in all departments handling inside information, including related parties, are required to comply with the prohibition measures outlined in this policy to prevent the misuse of inside information.
11. The Company must have a system in place to protect and prevent the misuse of inside information. This system ensures that inside information is not leaked and is not used for the purchase or sale of securities, whether for personal gain or for the benefit of others.

Directors, executives, and employees must review ethical conduct and policies, including the anti-corruption policy, which covers the use of internal information and confidentiality of the Company. The Company disseminates and conducts the review via an online platform, and they must sign their acknowledgment of compliance with the policy.

Report Financial Products

The Company requires that directors and executives report the following products in accordance with the regulations on reporting securities and futures contracts as prescribed in Section 59 by the Securities and Exchange Commission (SEC).

- Securities: Stocks / warrants / NVDR / TSR / DW that have securities of a listed company as the underlying asset (excluding DW with an index as the underlying asset) / convertible bonds / bonds with embedded derivatives
- Single stock futures (SSF) contracts that have securities of a listed company as the underlying asset and have been traded in futures exchange

Report on Changes in Securities Holdings and Futures Contracts

1. The Company will provide training to directors, executives, and employees regarding their duties in disclosing and submitting reports on their holdings and changes in holdings of securities and derivatives contracts, including those of their spouse, cohabiting partner, and underage children, to the Securities and Exchange Commission (SEC) in accordance with the Securities and Exchange Act, announcements by the Securities and Exchange Commission, and relevant announcements by the Capital Market Supervisory Board, including the penalties stipulated by law.
2. Directors and executive directors are required to disclose and submit reports on their holdings and changes in holdings of securities and derivatives contracts, including those of their spouse, cohabiting



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partner, and underage children, as well as legal entities, in accordance with the provisions of the Securities and Exchange Act, announcements by the Securities and Exchange Commission (SEC), and relevant announcements by the Capital Market Supervisory Board. These reports must be submitted to the Company Secretary before being sent to the SEC, following the required format and within the designated time period.

Commencement of Reporting Duties

- In the case of holding securities or futures contracts before assuming the position, it is not required to report under Section 59 when holding such position.
- In the case of holding securities or making any changes in securities or futures contracts after assuming the position, it is required to report any buying, selling, transfer, or receiving transfer of securities or futures contracts.

Reporter Characteristic	Process and Period of Reporting	
1. In the case of being a director or executive listed on the Whitelist*	(a) The report should be submitted whenever there are any changes** within 3 business days from the transaction date, regardless of the value.	(b) The report should be submitted when the condition is met, whether it is based on the elapsed time or the total value***, whichever comes first. 1) Total value of buying, selling, transfer, or receiving transfer transactions exceeding 3 million Baht. 2) When the elapsed period of 6 months is met, counting from the first date of transaction. Hence, the report should be submitted within 3 business days from the date the condition or deadline is fulfilled.
2. In the case of being a director or executive but not listed on the Whitelist*, To do so, the Company should submit the name of such director or executive to the Whitelist.	(a) The report should be submitted whenever there are any changes** within 7 business days from the transaction date, regardless of the value.	(b) The report should be submitted when the condition is met, whether it is based on the elapsed time or the total value***, whichever comes first. 1) Total value of buying, selling, transfer, or receiving transfer transactions exceeding 3 million Baht. 2) When the elapsed period of 6 months is met, counting from the first date of transaction. Hence, the report should be submitted within 3 business days from the date the condition or deadline is fulfilled.



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Notes:

- * *Whitelist is a list of directors and executives according to the notification of the Securities and Exchange Commission, stipulating the forms and procedures for reporting or changing director and executive information of the company.*
- ** *Transaction means buying, selling, transferring, or receiving transfer of securities or futures contracts.*
- *** *Total value means the total of purchases, sales, transfers, or receipts of transfer of every security or futures contract conducted by oneself and related persons.*

The Company has a performance monitoring system and reports the results of internal information protection to the Board of Directors for acknowledgment on an annual basis. Directors, executives, and employees must review the ethical conduct and anti-corruption policies, which include content on the use of internal information and confidentiality of the Company. The review is conducted via an online platform, and they must sign their acknowledgment after reviewing and completing a comprehension test.

2.10 Interested Transactions of Directors and/or Executive Directors Policy

The Company requires directors and executive directors to report their own interests, as well as those of their spouse or cohabiting partner and underaged children, if these interests are connected to the management of the business of the Company or its subsidiaries, while holding the position of director or top executive. In the event of any change in stakeholder information, or as part of the regular annual report, they must submit the interest report using the Interest Report Form for Directors and Executives (Section 89/14) and send it to the Company Secretary within 7 business days from the date of their appointment as a director or executive. The Company Secretary is responsible for providing a copy of the submitted interest report to the Chairman of the Board and the Chairman of the Audit Committee within 7 business days from the date of receipt of the report. This is to ensure compliance with the Securities and Exchange Act B.E. 2535 (1992) and to use the information for investigating and preventing potential conflicts of interest.

Criteria and Methods for Interests Reporting of Directors and Executives under The Securities and Exchange Act (No. 4) B.E. 2551 (2008):

1. Objectives

The Securities and Exchange Act (No. 4) B.E. 2551 (2008) stipulates that directors and executives must perform their duties in the company's operations and those of its subsidiaries with responsibility, caution, and honesty. Their decisions must be made without any direct or indirect personal interest in the matter at hand, and they must avoid actions that are significantly contrary to or inconsistent with the interests of the company and its subsidiaries.

Section 89/14 of The Securities and Exchange Act (No. 4) B.E. 2551 (2008) stipulates that directors and executives have a duty to report their own interests and those of related persons to the company. Section 89/16 of the Securities Act further specifies that the company secretary is responsible for submitting a copy of the interest report to the chairman of the board and the chairman of the audit committee within 7 business days from the date the company receives the report. According to the notification of the Capital Market Supervisory Board, the board of directors is responsible for determining the criteria and methods for reporting such interests. This provision has been effective since 1st July 2009.



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In addition, other relevant laws, such as the Public Companies Act B.E. 2535 (1992), require directors and executives to report their interests in any contract with the company and to notify the company of their shareholding or debentures in the company.

Therefore, in order to comply with relevant laws, the Company has established these criteria, along with the reporting form, to report interests and provide the necessary information for monitoring and overseeing the interests, as well as reporting any potential conflicts of interest of the Board of Directors and executives. This will assist the Company's directors and executives in performing their duties in accordance with the law and in preventing conflicts of interest.

2. Persons obligated to report their interests to the Company

According to the Securities and Exchange Act, the Company's directors and executives are obligated to report their interests. For the purposes of this Act, 'executives' refers to managers, the first four executive positions following the manager, individuals holding equivalent positions to any of the first four executive roles, and persons in management positions in accounting or finance, or equivalent, as defined by the Capital Market Supervisory Board.

3. Interests and background information required to be disclosed in the report

Directors and executives must disclose their own interests, as well as those of related parties, when agreeing to enter into any transaction with the Company or its subsidiaries.

In this regard, 'agreeing to enter into a transaction' refers to entering into, or agreeing to enter into, any contract or agreement, either directly or indirectly, that involves the acquisition or disposal of assets, renting or leasing of assets, using or receiving services, giving or receiving financial assistance, or providing professional services. However, directors and executives may choose not to submit a report on their interests if the transaction is deemed insignificant to decision-making, and if its value does not exceed 0.03 percent of the Company's net tangible assets or 20 million baht per year, whichever is lower. In the case of professional service transactions by independent directors, the threshold is 2 million baht per year.

In addition, the names of directors and executives must be disclosed to provide the Company with information necessary to comply with regulations on related transactions, which may lead to conflicts of interest or the transfer of interests involving the Company and its subsidiaries.

4. Methods and deadline for reporting

- 4.1 Newly appointed directors or executives must submit a report on their interests and personal background using the Report on Interests and Director/Executive Profile Form (Form 89/14) to the Company Secretary within 7 business days from the date of their appointment. In the event of new transactions involving interests or changes in personal information during the year, they must submit the Report on Changes in Interests and Director/Executive Profile (Form 89/14-1) to the Company Secretary within 3 business days from the transaction date or the date the information changes.



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- 4.2 Upon receiving the report mentioned in item 1, the Company Secretary shall prepare a copy of the report for the Chairman of the Board, the Chairman of the Audit Committee, and the CEO within 7 business days from the receipt of the report. Additionally, the report must be presented to the Board of Directors for acknowledgment at the next meeting held every quarter.
- 4.3 The Company Secretary shall prepare the report using Form 89/14 and send it to the Board of Directors and executives at the end of each year to confirm the accuracy of the information. This report will be disclosed in the Company's annual registration statement and/or annual report.

2.11 Personal Data Protection Policy

The Company is the controller of personal information, responsible for the collection, use, and disclosure in accordance with the Personal Data Protection Act (PDPA) B.E. 2562 (2019). This is to ensure the security of personal information for customers, employees, vendors, partners, and other relevant data owners, preventing breaches of personal data. It also serves as an internal control measure for personal data processing and a good practice for personal data protection, standardized with laws and regulations of the Office of the Personal Data Protection Committee (PDPC) and other regulatory agencies supervised by the government, as well as in accordance with the Company's policies, practical notifications, and other directives. Additionally, the Company's personnel—executives, employees, and relevant stakeholders—shall have an understanding of personal data protection and fully comply with the practical guidelines.

Guidelines

1. The Company respects users' privacy rights, giving significant importance to personal information rights and personal data protection. Personal information received by the Company, such as name, age, address, telephone number, ID number, vehicle and land registration numbers, and financial information, will be used solely for the Company's operations.
2. Regarding the collection and preservation of personal information with the owners' consent, the Company uses lawful and fair means to limit the collection and storage of personal data, only as necessary for electronic transactions or other electronic services. It will only be used for services aligned with the Company's objectives. The Company will not collect information related to religion, genetic traits, sexual behavior, or any data that could harm personal reputation or lead to unfair discrimination.
3. The processing of personal data must have the clear consent of the data owner, unless otherwise prescribed by law.
4. The Company will use and disclose personal information only with the express, written, or electronic consent of the data owner, unless consent cannot be obtained by these means. Personal information will be used only in line with the Company's objectives and when necessary. In certain cases, the Company may permit other individuals, agencies, or organizations to access or use personal information, but only as needed and under the authority of the Company, with prior consent from the data owner.
5. The Company will retain personal information for as long as reasonably necessary to fulfill the purposes specified in the Personal Data Protection Policy. If legal action is taken, personal data may be retained



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until the action is concluded, including any potential appeals or petitions. Afterward, personal data will be deleted or archived in accordance with applicable law.

6. The rights of personal data owners include the right to withdraw consent, the right to object, the right to be informed, the right to rectification, the right to restrict processing, the right to erasure (right to be forgotten), the right to data portability, and the right to complain.
7. The Company appoints a Personal Data Protection Officer (DPO) responsible for advising on operations, monitoring compliance, addressing issues, and ensuring the confidentiality of personal information in the course of their duties.
8. Contact or Exercise of Rights

1) Call Center: +662-4838888 or 1455

2) Data Protection Officer (DPO)

E-mail: dpo@muangthaicap.com

Location : Muangthai Capital Public Company Limited,
No. 332/1 Charansanitwong Road,
Bangplad, Bangkok 10700

The details of personal information protection policy and measures are publicly disclosed on the Company's website.

<https://investor.muangthaicap.com/storage/document/policies/mtc-data-privacy-policy-en.pdf>

2.12 IT Security Policy

The Company is committed to providing services with appreciation, in line with its business policy, while preventing potential issues that may arise in the IT network system due to users' wrongdoing and threats. Therefore, the Company supervises an information security policy that serves as a practical guideline for examination and information security, ensuring the safety and continuity of services for customers, as well as reducing IT risks and cyber threats, to maintain trust in the service.

The Company recognizes the risks to information and IT security that could significantly impact the Company's performance. In the event of a personal data breach or destruction of the IT security system, the Company has established a basic security foundation, system security, and IT processing devices related to customer service, in accordance with the ISO-IEC 27001:2013 Information Security Management System standard, as well as procedures and criteria in line with relevant IT security laws. Therefore, the Company supervises policies, measures, and risk prevention strategies, using them as practical guidelines for directors, executives, and employees to understand the importance of information security and avoid actions that could affect the Company's information security. The Company continuously develops and reviews the system to ensure its effectiveness.



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Guidelines

1. Information security is a fundamental criterion for developing secure processes and systems that are suitable for the Company's business operations. This policy is properly established in accordance with business principles, laws, and relevant regulations. Therefore, measures and/or related instructions may be implemented to support compliance with the policy.
2. The Company's executives, employees, and any external parties associated with the Company's information must understand, agree to, and comply with the information security policy guidelines.
3. The Information Security working group is the owner of the policy, responsible for managing and reviewing the policy's content at least once a year to ensure it aligns with potential changes and emerging risks that could impact the Company's information security. These changes may include strategic shifts, information technology (IT) directions, or significant alterations to the Company's structure or technology.
4. The Information Security working group shall assess the effectiveness of policy compliance and propose improvements to the policy or a strategic plan to enhance its effectiveness within the Company.
5. The information security policy is documented with clearly defined objectives and scopes, and it must be approved by the executives or the Board of Directors. The policy must be communicated to all personnel at all levels of the Company, including external parties who are associated with the use of the Company's information assets, and is effective immediately from the executives to employees and external stakeholders.
6. Executives, administrators, and users of information, as well as other individuals handling information assets, are directly responsible for supporting and complying with the policy. Other relevant users who are not directly responsible for information asset management must also participate in ensuring compliance with the policy. Violating the policy is considered a serious offense and is subject to the penalties outlined in the Company's regulations.

Due to the exponential increase and greater variety of cyber threats nowadays, the Company recognizes the importance of cybersecurity, which must be regularly examined and continuously developed. Therefore, the Company strives to uphold higher standards for cybersecurity through concise and careful procedures. The security measures include improvements in preparing for, defending against, and responding to threats, as well as ensuring system recovery to restore functionality and defend against threats in all areas. In addition to enhancing monitoring capabilities, the awareness of Company personnel is a key factor in maintaining information security. Therefore, the Company has educated its personnel on information security, covering key cybersecurity knowledge.

To ensure that the policy and information security measures related to customer service are effective and secure, and to maintain continuous service, the Company conducts regular information security assessments at least once a year. The results are reported to the Board of Directors or an assigned committee. The findings are publicly disclosed to all the Company's internal departments for implementation, and a copy is sent to the Bank of Thailand (BOT) within 45 days of completing the examination, including monitoring the examination of the bill payment system service under BOT governance and submitting reports as required by



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regulations to avoid violations of laws. Therefore, the details of the information security policy, including the IT security policy, are publicly disclosed on the Company's website.

<https://investor.muangthaicap.com/storage/document/policies/mtc-information-security-measures-and-policy-en.pdf>

2.13 Procurement Policy

The Company stipulates a procurement policy that is efficient, transparent, and free from corruption, considering the economic, social, and environmental impact (ESG). The procurement of goods and services is an important process that supports the Company's business operations. Therefore, the procurement process is designed to comply with regulations. The process is fair, reasonable, transparent, and verifiable, ensuring that there is no conflict of interest and that vendors are treated equally with fair competition to achieve the most beneficial outcomes for the Company.

Guidelines

1. The purpose of procurement must be clearly defined and presented to the authorized person according to the Company's procedures.
2. Prices from sellers or service providers must be compared transparently and fairly for all parties. Accepting financial or other benefits from sellers or service providers in exchange for goods or services that do not meet the terms of the agreement, fail to meet specifications, or do not meet the required quality or standards is prohibited. If such an event is discovered, the employee must immediately notify the Assistant Purchasing Manager to collaborate in finding a solution.
3. The Company treats vendors and creditors fairly, equitably, and without exploitation. We comply with trade conditions and/or contractual agreements made collectively in order to foster mutually beneficial business relationships. Additionally, the Company has a policy to treat vendors equally and fairly, considering the best interests of the Company while ensuring fairness to both parties. Conflicts of interest are avoided, and we are committed to providing accurate and truthful information and reports, as well as strictly adhering to the terms agreed upon with vendors. In the event of non-compliance with any conditions, advance notification is required to jointly consider a solution.
4. The Company has a systematic selection process, specifying seven criteria for vendor selection as follows:
 - 1) Technical competence
 - 2) Financial status
 - 3) Expertise and experience
 - 4) History of complaints / vendor confidentiality
 - 5) Anti-corruption / conflicts of interest / related transactions policy
 - 6) Product quality guarantee policy, after-sales service, and warranty
 - 7) Governance, social, and environmental processes of vendors
5. The Company has policies, practices, and regulations in procurement that take social and environmental issues into account as key factors in decision-making.



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- The Company conducts a regular risk assessment at least once a year, using criteria based on the top 20 annual purchase amounts to evaluate risks from vendors across all three aspects: economic, social, and environmental. According to the assessment results for all three aspects, vendors who meet the evaluation criteria must have a risk level within acceptable limits.
 - For vendors supplying goods and services for the first time, the Company has criteria for selecting new approved vendors, which include an assessment of social and environmental issues.
6. The Company has a policy to strictly comply with the terms, contracts, and obligations agreed upon with creditors, whether related to the purpose of fund usage, repayment, quality care, collateral, or any other agreed-upon matters. In the event that any condition cannot be met, the Company will promptly notify creditors and collaborate with them to find a solution based on the principle of reasonableness. The Company is committed to maintaining a sustainable relationship with creditors built on mutual trust. Approaches for capital management are established to ensure strong stability, preventing the Company from facing difficulties in repaying debt, while also prioritizing financial liquidity management through clear and timely debt repayment plans.
 7. The Company will inform vendors in advance of the number of branches planned to be opened each year, as outlined by the Branch Affairs Department. This notification will allow vendors to understand the expected quantity of products or services needed for the year, enabling them to plan their production and delivery accordingly to prevent delays or shortages.
 8. The Company provides opportunities for vendors to offer feedback and comments. Additionally, the Company organizes various projects and activities that engage vendors in business operations and foster sustainable development together.

Category 3 : Stakeholder Responsibility

The Company places importance on stakeholder engagement as a basis for accurately and thoroughly identifying sustainability aspects based on their priorities and needs. The Company has also established written guidelines for stakeholder responsibility in Corporate Governance and Corporate Social Responsibility (CSR) policies. Stakeholders are divided into seven groups: shareholders/investors/creditors, customers, employees, vendors, competitors, communities/society, and regulators. Relevant internal departments will engage with stakeholders through CSR-in-process activities, such as meetings, seminars, customer opinion/satisfaction surveys, employee engagement surveys, involvement in community/society activities, and environmental care. This will provide the information needed to determine appropriate actions in response to the interests and expectations of stakeholders.

3.1 Guidelines toward Customers

The customers' satisfaction and reliance on the Company are important to focus on when creating innovations in product and service design and development, as well as improving the operating processes to present better quality products and excellent service to customers, considering their demands and benefits above all. The Company has operated the business with a customer-centric approach under the slogan

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“Intimate Services Like Closed Family Members”. The Company is responsible for its customers and maintains the confidentiality of customers, including the creation of new innovations for convenience and speed. The Company has established policies and guidelines for dealing with customers, focusing on responsibility to customers, covering customer needs, customer satisfaction, the essential rights of customers, concise and appropriate disclosure of product and service information, and responsibility for advertising to prevent the misuse of customers’ understanding in a wrong way. These actions are conducted in accordance with the responsible lending policy and the announcement of the Bank of Thailand.

Guidelines

1. The Company’s business operations are service-oriented, which is key to its success, progress, and sustainability. The Company has established service excellence as its fifth mission statement: “The Company will provide excellent service and create the highest customer satisfaction.” This aligns with the Company’s slogan, “Intimate Service Like Close Family Members,” encouraging all employees to treat customers in accordance with this mission and slogan.
2. When presenting loan approval conditions, the Company ensures that the terms and/or benefits customers will receive are communicated transparently and clearly, aiming to provide the maximum benefit to customers. This is done in compliance with the responsible lending policy and the Bank of Thailand’s announcements.
3. The Company recognizes the importance of protecting customers’ personal information, which is collected, disclosed, and transferred as part of the service. Personal information management is structured to meet service goals and legal requirements while ensuring appreciation for customer privacy. The Company operates in accordance with the Personal Data Protection Act (PDPA), providing services through online channels and the customer service center (Call Center).
4. The Company offers customers the opportunity to file complaints regarding services provided by employees directly with the complaints department at the Head Office by calling (+66) 2-483-8888.
5. The Company has implemented a whistleblowing policy, which includes monitoring and protection of whistleblower rights.
6. In the event that customers face financial crises caused by natural disasters or public disruptions, such as floods or delays in payments for rice sold to farmers, the Company will have appropriate measures in place to assist customers.

3.2 Policy and Guidelines toward Shareholders / Investors / Creditors

The Company has built reliance among its shareholders, investors, and creditors by treating them equally, not restricting the rights of shareholders, and treating investors/creditors according to the conditions and contracts that have been made strictly and fairly. The Company has paid loans and interest correctly and punctually, and takes care of various collaterals completely, including not using the loan in a way that is contrary to its intended purpose. Furthermore, the Company has no policy of disclosing information that could cause damage to creditors. In the event that one of the conditions cannot be met, the Company must notify creditors in advance to jointly consider a solution.



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Guidelines toward Investors and Creditors

1. The Company respects the rights of investors and creditors equally, placing great importance on the accurate, sufficient, transparent, and timely disclosure of financial and general information. This enables investors and creditors to make informed decisions. The Company has a policy to strictly comply with the terms, contracts, and obligations agreed upon with investors and creditors, including the purpose of funds, loan repayment, guarantee terms, collateral quality, and any other matters agreed upon with creditors.
2. The Company has never had any disputes regarding default on debt settlement. Payments to creditors are made according to the payment terms agreed upon in advance.
3. The Company monitors loan and interest payments to creditors, ensuring they are made by the due date and in full compliance with loan covenants as per the agreement. In the event that the Company is unable to comply with any condition of the agreement, it will promptly inform the creditor in order to find a reasonable and mutually acceptable solution.
4. The Company provides accurate and honest status and financial reports to creditors on a periodic basis.
5. The Company has established a treasury strategy to promote security and strength in capital management, ensuring the Company does not face difficulties in repaying creditors. Additionally, liquidity management is in place to ensure timely repayment of debt at maturity.

Shareholders Responsibility

The Company recognizes and places importance on shareholders' rights equally. For instance, the Company does not engage in any actions that restrict the right to vote or opportunities to access its information. Hence, the Company provides communication channels with shareholders and investors through the Company's Investor Relations Department, which consists of professionals in investment. The Investor Relations Department is responsible for coordinating and disclosing information or documents for shareholders, as well as information on shareholders' rights on the Company's website to facilitate shareholders.

In addition, the Company arranges the notice of shareholders' meetings and provides information in both Thai and English to facilitate foreign shareholders, ensuring convenience and equality for all shareholders. Therefore, the Company has established a policy of shareholder facilitation and engagement in participation at shareholders' meetings, following Good Corporate Governance guidelines.

3.3 Fair Practices toward Employees

The Company has a policy and practices toward employees at all levels with fairness and equality. These include remuneration, benefits and welfare, career path, duties and responsibilities, training and awareness, safety and occupational health, labor protection according to the Labor Protection Act, as well as providing employee relations activities to promote unity and create happiness for employees.

Guidelines

1. The Company provides appropriate compensation based on the knowledge and abilities of each employee. This compensation is competitive with other companies in the same industry, and the Company



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also prioritizes the work environment by considering quality of life and safety at work. Additionally, we offer proper care, assistance, and welfare to our employees.

2. The Company is committed to the continuous development of employees at all positions and levels. Emphasis is placed on organizing annual training sessions and seminars, inviting knowledgeable and reputable speakers. This enables employees to learn and continually develop their skills and potential.
3. The Company offers both internal and external training courses relevant to employees' fields, aimed at enhancing the potential and expanding the knowledge of employees and executives.
4. The Company has a fair and transparent performance assessment system. The criteria for performance evaluation are communicated and made accessible to employees at all levels for their acknowledgment.
5. The Company has a policy to encourage employees to grow within their career path and continue advancing with the Company.
6. The Company provides opportunities for employees at all levels to participate in expressing opinions or asking questions, both directly and indirectly, to contribute to solving problems collaboratively.

Module 1 : Employment

Employment is conducted under Thai labor law, and the Company regulates it in accordance with the principles of good Corporate Governance and the Code of Conduct, ensuring equality and fairness by offering a positive experience to employees at every stage of their career path.

The Company emphasizes the development of employee potential by focusing on equality, without any limitations or discrimination based on gender, race, religion, or culture. Employees are considered the key driving force of the business. Therefore, the recruitment process is a crucial step that has a significant impact on the organization. Hence, the Company has an efficient recruitment and selection process as follows:

1. Survey the staffing needs of each department and develop a human resources plan (workforce) that aligns with the business growth strategy, including the opening of new branches or any changes that may impact the workforce.
2. Coordinate with the department heads who require new members to establish detailed qualification criteria for the positions.
3. Job vacancies are announced through the Muangthai Capital website and reputable job search platforms, clearly communicating the responsibilities and detailed job information to potential applicants.
4. Thoroughly screen all applications and conduct fair interviews. Select candidates who possess the necessary knowledge, skills, and experience, as well as demonstrate moral integrity and ethics, meeting the qualifications set by the Company.

During the employment period, the Company is dedicated to developing employees into individuals who are both high-quality professionals and good citizens. This is achieved by enhancing their knowledge and skills, as well as raising awareness through discipline, a strong organizational culture, and core values such as 'Morality, Exertion, Perspective, Harmony, and Discipline.' These are the key principles the Company instills and promotes, ensuring employees are disciplined and contribute positively to society.

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Module 2 : Employee's Compensation

The Company has a fair and competitive compensation policy in the market, including creating stability in careers and providing fair career advancement opportunities. It also offers various welfare benefits to employees, as required by law, such as social security, and additional benefits beyond what is required by law, such as medical expenses, as well as other types of assistance, including travel expenses, fuel expenses, and assistance in the event of the death of a father, mother, child, or employee.

Benefits and welfare

The Company defines the welfare and benefits allocated to permanent employees and contract workers. The details are as follows:

Benefits and Welfare	Employees	Contract workers
Health insurance, life insurance and accident insurance	✓	
Social security fund	✓	✓
Medical expenses (oneself)	✓	
Special price for the Act of motorcycles and cars	✓	
Parental leave rights	✓	
Maternity allowance	✓	
Marriage allowance	✓	
Statutory compensation up to retirement age	✓	
Provident Fund Contributions	✓	
Special accommodation	✓	
Gym (Head Office Building)	✓	✓
Others (New Year's party, local sports day, annual travel, marathon race, CSR activities)	✓	✓

For various benefits and welfare, the Company communicates information through various channels, such as the MTC University system, e-mails, circulars, and public relations boards. This ensures that the Company's personnel are informed about the benefits and can obtain them effectively.

Long-term returns

Apart from the salary and remuneration depending on performance, employees also receive remuneration from the Company's revenue sharing. This type of compensation gives employees a sense of involvement in the ownership of the Company. This sense of involvement has a clear, positive impact on business operations continuously. The resignation of employees in key positions (key persons) is detailed in the report, along with the number of employees who retired due to reaching retirement age.



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Details of benefits and welfare

1. Insurance
2. The Company provides health insurance, life insurance, and accident insurance to facilitate medical treatment, as well as create stability for employees and their families. In addition, the Company also provides special welfare, such as annual medical expenses for employees at all levels.
3. The Company allows employees to purchase Motorcycle Act insurance and personal cars at a discounted price.
4. In terms of benefits in the form of contributions, the Company provides various allowances for occasions such as marriage, financial support in case of childbirth, and more. The Company and employees have established a fund to help fellow employees in the event of a family death, among other situations.
5. To reduce the cost of living for employees, the Company provides accommodation by allowing them to stay at the branch building if necessary. Additionally, employees stationed at the Head Office will be allowed to stay at the Company dormitory, which is located near the Head Office building in Bangplad, Bangkok.
6. The Company provides a fitness facility in the Head Office building, which includes standard fitness equipment. It is available for employees and executives at all levels, including a shower room, without charging additional expenses to employees.
7. As working in teams is considered the core of the operation to achieve success and the most effective approach, and it is the main organizational culture of the Company, the Company has organized activities to foster relationships between employees. These activities include New Year parties, sporting events nationwide, the Company's annual tourism activities, marathon competitions organized by external organizations (through sponsors), and social activities (CSR). Employees are given the opportunity to contribute to society and the communities in which they are involved.
8. The Company has a legal reserve for employees aged 20 years or more who have the right to receive compensation of 400 days' wages upon retirement when they reach 60 years of age, in accordance with the Labor Protection Law No. 7.
9. Apart from general remuneration, the Company has also established a provident fund in accordance with the Provident Fund Act B.E. 2530 (1987). The Company and its employees contribute to the fund on a monthly basis at a rate of 3-5 percent of the salary. This provident fund is managed by Kasikorn Asset Management and will be paid back to employees upon retirement, following the fund rules of the Company.
10. Due to the duties and responsibilities of most operational employees who need to use motorcycles as a vehicle to perform their duties, the Company provides helmets to employees in accordance with the Company's safety policy. Employees are required to comply with laws that mandate motorcyclists wear helmets at all times for their safety and to reduce the severity of any unexpected accidents that may occur.

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Module 3 : Personnel potential development

The Company has a policy to promote personnel development. Effective training helps individuals increase their operational efficiency, change their attitudes toward work, and improve the quality of operations regularly. Therefore, the development of the Company's personnel is considered key to the organization's survival. It also fosters growth for the organization. It helps increase knowledge, understanding, attitude, and working skills among personnel. The task of developing knowledge, understanding, and skills to become proficient in performance is therefore an important duty.

Potential Development Program

In the operation of personnel training and development, it starts with the process of identifying needs and training requirements to create and develop training courses for employees, as well as monitoring and evaluating training results. This process can be used to develop personnel through training in all positions.

1. Training for performance development: consists of new employee orientation, leadership training for supervisors and managers, excellent service, debt collection techniques, and management training
2. Training for raising awareness in other matters: Consists of compulsory courses intended to enhance standards and courses for the promotion of career and business sustainability, such as brokerage training, insurance renewal, Market Conduct, Personal Information Protection Act, AML/CTPF, responsible lending courses, etc.

Employees who are responsible for products and services will be assessed through a process called "MTC Model," using key performance indicators (KPIs). It is an assessment standard of employee performance, which is a key factor in determining their remuneration. The Company will assess each person individually through a 360-degree assessment. The assessment process will be conducted with impartiality, transparency, and fairness.

Module 4 : Occupational Health and Safety at Workplace

Safety and occupational health of employees are priorities for the Company, with the understanding that safety and good health are fundamental rights that everyone deserves. In addition, investment in safety is considered an important risk prevention strategy for the Company. The number of accidents that occur within the Company can have a significant impact, whether it affects personnel confidence, causes property damage, or harms the Company's reputation. For this reason, the Company is committed to continuously developing safety measures and enhancing the Company's safety culture.

The Company places importance on safety, occupational health, and the working environment for employees at all levels, from executives to staff, aiming to operate the business without incidents that cause injury or damage to employees. The Company strives to reduce accidents from operations to zero. Therefore, the Company has established policies and practices for safety and the environment in line with the international standard ISO45001.



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Occupational Health and Safety at Workplace

The Company is concerned about the life and health of all employees. It has established a safety policy in the workplace to create knowledge and understanding, encouraging all personnel to cooperate in complying with the policy. To ensure employees are aware of the importance of safety at work, the Company has set a policy to adhere to the following operating safety guidelines:

1. Create a safe work culture for the Company's employees by developing the safety, occupational health, and work environment management system. Abide by laws and international principles.
2. Issue regulations and supervise employees to operate safely according to the Company's rules. All employees are required to wear helmets during operations.
3. Encourage employees and vendors to participate in safety, occupational health, and work environment initiatives.
4. Provide risk assessments and potential hazard prevention in terms of safety, occupational health, and the environment. Under the supervision of the Ministry of Construction and Sustainable Development of Thailand, a strict and effective risk prevention and resolution plan has been formulated by Capital Public Limited. Results should be reported to the Corporate Governance and Sustainability Committee at least twice a year.
5. Improve skills and educate employees about the importance of safety, occupational health, and the working environment. Provide regular safety training and fire drills for employees.
6. Develop monitoring and evaluation plans according to the Company's safety, occupational health, and work environment policies. Assess the skill levels of employees.
7. Provide resource support for the development and operation of safety, occupational health, and work environment programs.
8. The Company believes that safety, occupational health, and the working environment are the responsibilities of all departments within the Company.

Guidelines

1. Protect the health and safety of employees, customers, and the public who are affected by the Company's activities, with empathy for stakeholders in every dimension, by providing adequate and hygienic facilities such as toilets, drinking water dispensers, etc.
2. Safety at work is the primary responsibility of all employees in the operation.
3. The Company supports the improvement of working conditions and an environment that is both physically safe and conducive to good mental health at work.
4. The Company encourages safety activities and creates employee engagement, such as organizing fire escape training courses at least once a year and providing knowledge through public relations boards, newsletters, etc.
5. Supervisors at all levels must act as role models, always leading training and motivating employees to work safely.
6. All employees must consider the safety of their colleagues as well as the Company's assets throughout their working hours.



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7. All employees must maintain cleanliness and orderliness in the workplace to reduce the risk of accidents and ensure safety and good hygiene for both employees and customers.
8. All employees must supervise and cooperate in projects related to the Company's safety and health.
9. Accident data involving employees should be collected for analysis and to set preventive measures.
10. Provide a channel for reporting unsafe practices or workplace environments through the Company's contact channels, coordinating with those involved to investigate and resolve complaints.
11. Promote activities for employees' health and well-being, organizing an annual sports day to encourage participation and promote good health, as well as supporting projects related to exercise and physical activity.

Module 5 : Fair Practices toward Employees

The Company has policies and practices that apply equally and fairly to all employees, without exception, at all levels. These policies cover areas such as compensation, employee transfers, training, occupational health, safety, career growth, labor protection, and the establishment of a welfare committee in the workplace. The committee is responsible for managing the operational plan and labor relations activities as required by law.

Policy to promote the underprivileged

The Company recognizes the importance of improving the quality of life for disabled individuals and vulnerable groups. People with disabilities are encouraged to demonstrate their abilities to generate income and achieve self-reliance, while also reducing the burden on their families and society. This includes empowering disabled individuals to become a vital force in strengthening both their families and the national economy. The Company adheres to Section 33 of the Law on the Promotion and Development of the Quality of Life of Disabled Persons B.E. 2550 (2007), by employing people with disabilities and contributing to the promotion and development fund for the quality of life of disabled persons, fully complying with the rules set by the law.

3.4 Policy and Guidelines toward Vendors

Vendors are considered key stakeholders who play an essential role in driving the organization's business continuity. As such, the Company has implemented transparent, fair, and verifiable procurement guidelines. These guidelines are integral to the selection criteria for vendors and include considerations such as business ethics. The Company has also established a process for monitoring and evaluating suppliers to proactively address and mitigate risks that could affect the quality of service, brand image, and operations, both directly and indirectly. Furthermore, the Company fosters an environment that encourages vendors to maximize their potential, building strong, enduring business relationships for long-term success.



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The Company conducts regular assessments of vendor satisfaction and various risks that might arise from vendors, at least once a year, to promote sustainable business operations.

- Economic assessment: e.g., number of vendors in the market, product quality, and delivery efficiency
- Social assessment: e.g., compensation and labor welfare, human rights, workplace safety, regulations, and laws
- Environmental assessment: e.g., polluted waste management and reduction of GHG emission

Guidelines

1. Not demanding, accepting, or giving any wrongful benefits in any form to vendors.
2. If any bribes are offered or raised, disclosure to vendors must be made, and a joint solution must be acted upon fairly and quickly.
3. Agreed commitments must be strictly followed; any concerns or conditions must be communicated to trading partners in advance to jointly find solutions.
4. The payment term is set to be within 30 days for vendors.

Criteria for Selecting Vendors

The Company emphasizes selecting qualified vendors, ensuring that the selection process and practices toward vendors are conducted with fairness and equality. These criteria include a good reputation, ethical standards, professionalism, and the capability to comply with the set agreements and conditions systematically, as follows:

- Technical competence
- Financial status
- Expertise and experience
- History of complaints / vendor confidentiality
- Anti-corruption / conflicts of interest / related transactions policy
- Product quality guarantee policy, after-sales service, and warranty
- Governance, social, and environmental processes of vendors

3.5 Policy and Guidelines toward Competitors

The Company places great importance on treating competitors fairly by conducting business within the framework of ethics and good competition rules. It complies with relevant rules and regulations, avoids damaging the reputation of competitors, and ensures confidentiality is maintained honestly and without improper means. The Company does not take advantage of competitors, illegally obtain confidential information, or infringe on the copyrights or intellectual property rights of competitors. Additionally, the Company supports cooperation with competitors to benefit consumers, without attempting to monopolize market share or harm the reputation of business competitors through malicious accusations.

Guidelines

1. Comply with competition rules.
2. Do not obtain non-confidential information from competitors through dishonest or improper means.
3. Do not damage the reputation of competitors.



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3.6 Community and Social Development and Responsibility

The Company primarily focuses on being a responsible microfinance loan service provider. Therefore, it has established a social value policy by participating in community development, adhering to local traditions. The Company regularly supports and enhances cultural and local traditional activities within communities, collaborating with both public and private sectors, such as:

- **Economic Dimension:** The Company sets its main goals for economic sustainability development as follows: developing access to funding sources, reducing economic disparities among people, contributing to the control of household debt at appropriate levels, and enhancing the quality of life by providing efficient financial services. These goals reflect the Company's business philosophy, which is evident in its loan products, interest rates and fees, service standards, performance indicators, and community investments. This aligns with the Company's objective of extensively providing financial opportunities and growing sustainably with the Thai community.
- **Education Dimension:** Since 2012, the Company has initiated a project to build a children's development center called "New Home for Chance," continuing to build this center each year in rotation according to the location of its branch. Additionally, the Company runs a project named "I-Tech for Teens," in which refurbished old computers are provided to prevent e-waste and donated to underprivileged schools.
- **Social Dimension:** The Company has established a social sustainability development strategy focused on strengthening the community and society, making the Company an integral part of the community. This begins with the development of direct stakeholders, including employees and customers, through related policies and CSR projects in communities surrounding the Company's branches.

Every June, the Company invites its employees to participate in a blood donation drive organized by the Thai Red Cross Society. This tradition has been upheld continuously for years, alongside supporting local traditions such as the long boat race, worshipping ceremonies, dragon costume parades, and more. Additionally, the Company has implemented a policy prohibiting employees at all levels from engaging with drugs in any capacity, whether as a dealer or user.

3.7 Policy and Guidelines toward Regulators

The Company operates under both a personal loan and a microloan business license, both regulated by the Bank of Thailand. As such, the Company must comply with the supervisory guidelines for business operators under these licenses. This includes ensuring fair market conduct, practicing responsible lending, and providing accurate, transparent, and timely reports to the relevant regulators.



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Category 4 : Environmental Responsibility and Climate Change Management

Although the Company is a financial business and does not directly impact the environment, it acknowledges that its operations contribute to environmental issues through the use of natural resources, such as fuel and electricity. Therefore, the Company is committed to conducting its business with environmental responsibility and climate change management in mind. The Company has established a policy focused on the efficient use of resources and minimizing negative environmental impacts at the organizational, regional, and international levels, while engaging employees to raise awareness about environmental conservation. As part of this policy, the Company starts with its workplace environment by implementing the 5S activities—Sort, Set in order, Shine, Standardize, and Sustain—held annually. The Company also manages the use of office equipment within the allocated budget and encourages employees to be mindful of the economical use of resources.

The Company focusing on the effective use of resources and energy conservation practices, including:

1. Engage executives and employees to recognize the impact of climate change and its negative effects on the organization, while emphasizing the importance of effective resource management.
2. Strictly comply with environmental laws and regulations, both locally and internationally, and commit to surpassing the minimum legal requirements.
3. Select technologies and operating procedures that meet environmental standards, and encourage the adoption of standardized innovations, such as using solar energy through solar cell technology, implementing paperless projects using e-receipt technology, and supporting certified green products.
4. Promote the reuse of resources, such as using both sides of paper, utilizing environmentally friendly paper products, and properly sorting waste for recycling (e.g., plastic containers).
5. Energy reduction: turn off air conditioners and electrical devices during non-operational hours or when executives and employees are not in the office for extended periods, and use energy-efficient LED lightbulbs.
6. Oversee and monitor climate change management by studying and implementing guidelines for reducing the carbon footprint within the organization in line with international standards.

The Company has established a culture of environmental conservation in daily operations, communicating the importance of these efforts to all employees. Energy conservation efforts include resource utilization, environmental preservation, reuse, recycling, and reduction, with ongoing communication to ensure all personnel are informed and engaged in these initiatives. In recognition of the risks posed by climate change, the Company has prepared countermeasures that adhere to international standards. The additional details of environmental responsibility are disclosed on the Company's sustainability website (sustainability.muangthaicap.com) or Sustainability Report.



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Category 5 : Code of Conduct of Directors

The Board of Directors is committed to adhering to ethical standards that best serve the interests of shareholders and stakeholders, in accordance with the principles set out in the Securities and Exchange Act. If the Board fails to comply with Section 89/19 of the Securities and Exchange Act, they will be subject to penalties under Section 281/5 of the same Act. Non-compliance with Section 89/15, paragraphs 1 and 2, may result in a fine of up to 100,000 Baht, along with a daily fine of 3,000 Baht for the duration of the violation. Furthermore, the Chairman of the Board, who fails to comply with Section 89/15, paragraph 3, will also be subject to a fine of up to 100,000 Baht, along with a daily fine of 3,000 Baht for the duration of the violation. As a result, the Company set a Code of Conduct to be practical guidelines for directors as follows:

5.1 Director's Code of Conduct toward the Company

Guidelines

1. Perform duties with honesty and transparency, always acting in the best interests of the Company, and avoid any actions that may lead to conflicts of interest with the Company.
2. Apply knowledge and management skills to their full potential.
3. Directors will adhere to the laws, rules, and regulations governing business operations under the principles of good Corporate Governance, including directors and senior management. This includes notifying the Board of Directors or the designated representative at least one day in advance of any trading of the Company's shares.
4. Directors, executives, and related persons (such as spouses and minor children) must refrain from buying, selling, or transferring the Company's securities during the period prior to the disclosure of financial statements. Once the financial statements have been publicly disclosed, any purchases or sales must be reported to the Company Secretary, who will then prepare and submit a report on changes in securities holdings (Form 59-2) to the SEC within the prescribed timeframe. The securities holdings of directors and executives should be reported at every quarterly Board of Directors meeting.
5. Related transactions and stakeholder reports of directors and executives, aimed at preventing conflicts of interest, must be reported to the chairman and included as an agenda item for discussion at the Board of Directors' meetings every quarter.

5.2 Director's Code of Conduct toward Shareholders

Guidelines

1. Commit to disclosing information accurately, completely, adequately, and in a timely manner to ensure equal access to information, while being cautious not to mislead shareholders or create confusion.
2. Uphold the rights of shareholders and treat all shareholders equally, regardless of gender, age, race, nationality, religion, belief, or political opinion. Even if shareholders are unable to attend the meeting due to any inconvenience, they have the right to appoint another person to attend the meeting on their behalf.



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3. Refrain from seeking personal benefits or using inside information that has not yet been disclosed to the public for personal gain or the benefit of others involved.

5.3 Director's Code of Conduct toward Employees

Guidelines

1. Establish policies regarding safety, workplace environment, compensation, and fair welfare for employees.
2. Treat employees with respect, refrain from any unjust behavior, and be open to their opinions and suggestions.
3. Continuously promote knowledge development and enhance the abilities of employees.
4. Ensure that the Company implements ethical practices and provides clear guidelines that employees can follow to foster behavior aligned with ethics throughout the organization.

5.4 Director's Code of Conduct toward Customers

Guideline

1. Support and encourage the Company to innovate in order to achieve the highest level of customer satisfaction.
2. Oversee the Company in establishing a system for customers to file complaints and ensure quick responses to customer concerns.

Category 6 : Code of Conduct of Executives

The Code of Conduct for Executives is designed to ensure that they uphold the highest standards of transparency and ethics in conducting the Company's business. Executives are expected to perform their duties with honesty, integrity, caution, and prudence, always prioritizing the best interests of shareholders and stakeholders. As a result, a comprehensive Code of Conduct has been established to serve as a guiding framework for executives to follow.

6.1 Executive's Code of Conduct toward the Company

Guidelines

1. Perform duties with honesty and avoid any actions that may cause a conflict of interest with the Company.
2. Carry out management duties to the best of their ability, with care and in compliance with the principles of good Corporate Governance.
3. Establish a control system and effective internal audit processes to ensure that the Company complies with relevant standards and laws, under the scrutiny of internal auditors and review by the Audit Committee.
4. The Management is responsible for preparing financial reports that are accurate, complete, and timely, including both quarterly and annual financial statements, in accordance with Thai Financial Reporting Standards (TFRS).



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6.2 Executive's Code of Conduct toward Shareholders

Guidelines

1. Prepare a report on the status and performance of the Company, along with other important information, to shareholders in a manner that is equal, consistent, complete, and accurate.
2. The Company emphasizes that executives perform their duties with honesty and integrity within the framework of the Company's rules and regulations. By upholding this Code of Conduct, executives are expected to act with fairness in all activities, decisions, and transactions, ensuring that business is conducted with honesty and fairness to all shareholders.
3. The Company is committed to conducting business in a manner that delivers sustainable returns to shareholders while ensuring the accurate, complete, sufficient, and timely disclosure of information. This enables shareholders to access information equally and helps prevent misunderstandings or confusion regarding the disclosed information. The Company also provides updates on business progress and news through various media channels, such as newspapers and the Company's website, to ensure that shareholders are equally informed. Furthermore, it prohibits relevant parties or stakeholders from buying or selling shares before the designated disclosure.

6.3 Executive's Code of Conduct toward Employees

Guidelines

1. Provide appropriate compensation based on the knowledge and abilities of each employee, ensuring it is comparable to industry standards for similar positions. The Company also takes care of the work environment, considering the quality of life and safety at work, and offers proper care, assistance, and welfare to employees.
2. The Company has clear policies and guidelines regarding compensation, career growth, and welfare benefits for all employees. These policies are publicly announced on the Company's internal website under the Personnel Department section, which employees can read and study.
3. The Company is committed to the continuous development of its personnel at all levels. This includes organizing annual training sessions and seminars, where reputable speakers are invited to share knowledge. Employees can continuously improve their skills and knowledge, which contributes to their career growth and prepares the organization to cultivate future executives for key positions.
4. Appointments, relocations, and decisions related to rewards and disciplinary actions must be carried out in good faith, based on the knowledge, abilities, and performance of the employee.
5. The Company has a system for assessing merit and fairness, with the assessment criteria disclosed to all employees for their acknowledgment. This encourages employees at every level to progress and grow within the organization.
6. Emphasize the importance of employees' understanding of the Code of Conduct and their roles in fostering behavior aligned with this Code throughout the organization.
7. Supervisors should conduct themselves in a manner that earns the respect and esteem of employees, while employees should refrain from engaging in any actions that disrespect their supervisors.
8. Refrain from giving or receiving gifts between supervisors and subordinates



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6.4 Executive's Code of Conduct toward Customers

Guidelines

1. Present loan approval conditions and/or benefits that customers will receive in a transparent and clear manner, ensuring that customers fully understand the terms and can benefit as much as possible.
2. In cases where customers experience financial hardship due to natural disasters that impact the public, the Company will provide appropriate assistance to help ease their burden.
3. Provide customers with the opportunity to give feedback on the service they received directly to the Whistleblowing Department at the head office. Customers can contact the Company through (+66) 2-483-8888 or 1455, or by sending a letter to the head office.

6.5 Executive's Code of Conduct toward Competitors

Guidelines

1. Treat competitors fairly, avoiding actions that attack, slander, or damage their reputation, including the use of misleading publicity. All activities should be conducted under the principles of fair competition, without any attempt to undermine competitors or infringe upon their intellectual property or copyrights.
2. The Company's business operations must be managed in a way that ensures sustainable and stable growth, with careful, honest, and fair practices toward all stakeholders.
3. Do not seek competitors' confidential information through dishonest or inappropriate means, such as bribing competitors' employees.

Category 7 : Code of Conduct of Employees

The Employee Code of Conduct in this guideline is established as a fundamental standard to ensure employees act ethically, in line with the principles of good Corporate Governance. It provides clear, practical guidelines for employees to follow, as outlined below:

7.1 Employee's Code of Conduct toward the Company

Guidelines

1. Employees must avoid any actions that are contrary to the interests of the Company, whether through contact with the Company's trade-related parties, such as customers or competitors, or through the use of opportunities or information obtained from their position as a director or employee for personal exploitation. Additionally, employees must not engage in activities outside of their work that could negatively affect their job performance.
2. Employees must take full responsibility for their duties, knowledge, and abilities, ensuring that their actions contribute to the maximum benefit of the Company. They must not exploit their position for personal gain or use their role to seek benefits for themselves.
3. Employees must maintain a positive attitude, protect their own reputation, and uphold the Company's image. They must avoid engaging in actions or sharing information that could tarnish the Company's reputation or cause misunderstandings with external parties.



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4. Employees must perform their duties with honesty and integrity. They must not ask for, accept, or agree to receive money, gifts, or any other benefits from parties connected to the Company's business, especially in relation to procurement. All transactions must be conducted transparently, with the ability to check and compare prices from tendered businesses.
5. Employees must contribute to a positive working atmosphere and help build solidarity among colleagues. They must avoid actions that could harm the Company's reputation or create future problems for the organization.
6. Employees must be committed to activities that enhance the quality, efficiency, and development of the Company. They should work toward achieving excellence in all aspects of their role.
7. Employees are prohibited from accepting traditional gifts unless they are received on behalf of the Company and collectively, rather than individually.
8. Employees must not claim or accept gifts, money, or any other benefits for themselves or others that could serve as motivation for improper actions or influence their duties, such as in procurement or other business dealings.
9. Employees are responsible for safeguarding the Company's assets, ensuring that they are not damaged, lost, or misused. They must use assets efficiently and for the full benefit of the Company. Company assets must not be used for personal gain or the benefit of others.

7.2 Employee's Code of Conduct toward Executives

Guidelines

1. Be respectful, polite, and humble toward supervisors, and comply with lawful orders.
2. Do not make false reports or offer dishonest opinions to supervisors, and avoid defaming management without factual evidence.
3. Refrain from giving gifts to supervisors.

7.3 Employee's Code of Conduct toward Colleagues

Guidelines

1. Provide knowledge and share work experience with participants or offer advice to colleagues to contribute to organizational development.
2. Foster unity and strengthen relationships by participating in various activities organized by the Company.
3. Treat colleagues with politeness and respect, maintaining a collaborative work environment.
4. Never take credit for the work of colleagues or present their work as one's own.

7.4 Employee's Code of Conduct toward Oneself

Guidelines

1. Be honest, uphold correctness and morality, and have good intentions toward oneself, avoiding corruption or fraud.
2. Dedicate and devote time fully to work.



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3. Maintain a positive attitude, take pride in being an employee of the Company, and uphold one's reputation and honor.
4. Demonstrate public recognition, be altruistic, foster unity, and avoid creating conflicts.
5. Be punctual and dedicate time fully to work.
6. Continuously develop oneself to work both efficiently and effectively.
7. Refrain from all vices and avoid behaviors that could defame one's reputation or the dignity of oneself and the Company.
8. Seek knowledge and experience to improve professional competence, always working efficiently while maintaining good moral character and ethics as a capable member of the Company.
9. Regarding receiving traditional gifts, any gift with a value not exceeding 3,000 Baht must be reported to vendors or third parties and it should be given directly to supervisors. Supervisors should hand over such gifts to the General Administration Department, along with the gift-receiving form.
10. Refrain from giving gifts to supervisors or accepting gifts from subordinates.

7.5 Employee's Code of Conduct toward Customers

Guidelines

1. The success of the Company is focused on customer satisfaction. All employees must build strong relationships with customers by adhering to the principles of honesty, ethical conduct, and understanding that each customer has unique needs and expectations. This also includes practicing responsible lending and market conduct, providing clear, correct, and transparent information about loan terms, including the loan period and conditions.
2. Employees must comply with contracts, agreements, or conditions with customers. If, for any reason, it becomes impossible to fulfill the terms of the contract, employees must proactively engage with customers to negotiate and find mutually agreeable solutions, thereby preventing any potential damage.
3. Employees should respond to customer needs with prompt, willing service, in line with the core value: "We will create customer satisfaction through convenient, fast, excellent service, and low interest rates," along with the slogan "Intimate Service Like Close Family Members".

7.6 Employee's Code of Conduct toward Competitors

Guidelines

1. Employees must operate within the framework of fair competition rules, refraining from damaging the reputation of competitors by making false accusations or using defamatory publicity. All actions should be conducted in accordance with fair competition practices, ensuring no harm is caused to competitors through malicious labeling.
2. Employees must not attempt to obtain confidential information from competitors through dishonest or improper means, such as bribing competitors' employees.



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Category 8 : Compliance Monitoring

The Corporate Governance and Sustainability Committee is responsible for monitoring and promoting the Company's compliance with its policies and Code of Conduct. The Company has clearly defined the duties and responsibilities for directors, executives, and all employees, ensuring they acknowledge and strictly adhere to these policies and guidelines. A compliance monitoring system is in place to oversee all activities across every aspect of the business.

It is essential for executives to lead by example, encouraging employees under their supervision to understand and follow the Code of Conduct. The Company is committed to acting in accordance with the law and upholding the principles of good Corporate Governance. Should directors, executives, or employees engage in any wrongdoing, they will face disciplinary action. Furthermore, in the event of any violations of the law or the Company's Code of Conduct, whistleblowers are encouraged to submit complaints to the Internal Audit Department via the established whistleblowing channels. These complaints will be handled by the Internal Audit Department accordingly.

Penalty

If the Company identifies or receives a report regarding a violation of the Code of Conduct, the Disciplinary Committee will handle the matter in accordance with the Company's disciplinary procedures. If the Disciplinary Committee determines that an employee has violated the Code of Conduct or the Company's policies, appropriate disciplinary action will be taken in line with the established procedures.



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INTIMATE SERVICES LIKE CLOSED FAMILY MEMBERS