



Code of Conduct Guidelines



MUANGTHAI CAPITAL PUBLIC COMPANY LIMITED

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

Introduction

Muangthai Capital Public Company Limited and its subsidiaries have been determined to manage and operate business with due regard to social responsibility and stakeholders such as shareholders/investors/creditors, customers, employees, vendors, competitors, regulators, communities and surrounding society, including the environmental responsibility. This is to create sustainability in business and able to manage the business to grow steadily and be accepted in society.

This business Code of Conduct guidelines is a practical guideline for directors, executives and all employees to understand the standards which the Company has adhered to operate the business and for portraying the intention with transparency, ethics and responsibility to stakeholders considering society and environment. This is to ensure that employees are able to follow the practices in the same direction following the good Corporate Governance principles and business Code of Conduct of the Company.

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Category 1 : General Information

1.1 Objectives

1. Muangthai Capital Public Company Limited (“the Company”) and its subsidiaries have determined to manage and operate business with due regard to social responsibility and stakeholders to create sustainability in business and able to manage the business to grow steadily and be accepted in society.
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 ethically operates business 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 to the benefits and impacts of business operations on stakeholders related to the Company.
4. To ensure that the Company has been responsible for and monitored the compliance with business Code of Conduct strictly following the principles of Good Corporate Governance.

1.2 Meaning and Importance of Code of Conduct

The Company is determined to manage and operate 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, ethics and responsibility to stakeholders considering society and environment.

1.3 Definition of Words

Code of Conduct

the Company’s practical guidelines associated with the principles of Good Corporate Governance to encourage personnel to operate business transparently, ethically, examinable and take responsibility for the stakeholders, society and environment. This is to reflect a good image of

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the Company with the ethic framework and social responsibility that enhance the business and society to sustainably grow together.

Ethic	To practice following the tradition, culture, morals to be accepted in society.
Good Corporate Governance	The essential fundamental principles of Corporate Governance established to be a guideline with the same direction such as Integrity, Fairness, Transparency, Responsibility and Accountability.
Principles of Good Corporate Governance	A guideline for social decoration with peace and justice in society
Stakeholders	Divided into 7 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 Management of Muangthai Capital Public Company Limited
Employees	Employees of Muangthai Capital Public Company Limited and its subsidiaries including regular employees and contact employees
Investor	Divided into 4 groups: (1) Institution Investor, (2) Ultra High Net Worth Investor, (3) High Net Worth Investor and (4) Retail Investor who has transactions with the Company. Financial status of the Ultra High Net Worth Investor and High Net Worth Investor must be as prescribed by the SEC to ensure that they are capable of handling risks and accessing to products of investment with risk and complexity.

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Asset	Both tangible and intangible asset as well as confidential information which is not publicly disclosed such as business plan, financial, human resource and debtors' information.
Bribery	Money, asset or gifts given for personal benefits
Corruption	Referring to the wrongful use of authorities and duties in order to obtain undeserved benefits, such as giving gifts or services. Giving cash or something instead of cash bribery of government officials and corruption between private entities whether under any circumstances by offering a pledge, conflict of interest, concealment of facts or any other benefits that are contrary to morals and good ethics which is not suitable for government officer, government agency, private agency or those who have duties whether directly or indirectly for such person to act or refrain, duty or to obtain or maintain any other improper business interests or for the benefit of oneself, family and friends, except in the case of laws, regulations, announcements, regulations, local customs or trade practice to be allowed.

Category 2 : Code of Conduct

2.1 Code of Conduct Guidelines

The Company is determined to manage and operate business with due regard to social responsibility and stakeholders such as shareholders, customers, business partners, employees, communities and surrounding society. 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 main focus is on social responsibility. The Board of Directors adheres to the correct and fair business operations by stipulating the Code of Conduct in writing for practice and disseminating to directors, executives and all employees to understand the standards. The business code that the Company uses in its business operations are practical guidelines to show the intention to conduct business with transparency, ethics and responsibility to stakeholders considering society and environment through training and communication within the organization in various forms. The Code of Conduct reflects the values of and operational guidelines. All employees must conduct themselves and practice following the Code of Conduct

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framework set forth in various fields as well as informing everyone to strictly adhere to and to ensure compliance with the mentioned guidelines.

2.2 Business Operation with Fairness

Guidelines

1. The Company establishes policies and guidelines for dealing with all customers by clearly notifying conditions. Such conditions are fair and given advice to help customers with politeness and gentleness, listening to problems and suggesting solutions to customers without disclosing customer secrets.
2. The Company treats vendors and creditors fairly, equitably, without taking advantage by complying with trade conditions and/or contractual agreements made strictly together to develop business relationships that benefit both parties.
3. The Company treats the competitors fairly without action that attack, sabotage, or cause a damage to the reputation of competitors including affixing publicity labels. The operation will be conducted under good competition. There is no label to destroy competitors.
4. The Company's business operation must be managed in order for the business to grow sustainably and stably under careful operation honesty being fair to those involved.
5. Do not seek competitors' confidential information through dishonest means or inappropriate, such as paying a competitor's employee.

2.3 Human Right Policy and Labor Practices

The Company shall not commit any violation of human rights in every business activity, realizing the importance of equality of people by neither violating human rights nor discriminating due to the diversity of origin, race, gender, age, education, disability, economic and social status or politic opinion. Besides respecting the fundamental human rights, the Company including customers, vendors and all stakeholders in the business value chain, determines complying with the international guideline of labor practices and labor laws of Thailand. Therefore, it is appropriate to set policies and guidelines on human rights and labor practices as follows:

1. The Company values and respects human rights by treating people or any group of people including all stakeholders of the Company with equality without distinction of physical, mental, race, religion, gender, language, age, skin color, education, social status, culture, customs, political attitude, or any other matters.
2. The Company will not do anything that violates the rights and freedoms of a person or any group of people, both directly and indirectly, including physical harassment, verbal abuse, intimidation, harassment, humiliation, sexual harassment, etc.
3. The Company will be careful in performing its duties to prevent risks of infringement of the rights of human beings in all business activities.

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4. The Company will not use and support the partners' illegal labor in all categories including child labor and other illegal workers.
5. The Company provides communication disseminating human rights policies and practices to all stakeholders in the business value chain so that all stakeholders can engage in humane business operations with respect to human rights by this policy of the Company.
6. The Company provides surveillance on human rights respect in each step of the operation, and does not neglect or ignore if there is an act that violates human rights. Employees have duties to report to the supervisor or a person in charge to acknowledge. The Company provides a process to protect people who report complaints or doubts about human rights violating behavior by using measures to protect whistleblowers or complainants as the Company set out in the acceptance policy complaint (Whistleblower Policy) such complaints will be directly sent to the Chairman of the Audit Committee.
7. The Company aims to create an organizational culture that adheres to respect for human rights that employees adhere to, is a working guide so that employees can live together in a happy and accepting environment. In addition, this culture is reflected in the practice of providing services with the highest standards to all groups of stakeholders with equality.
8. The Company provides an assessment process and can identify the issues of human rights violation risks and impacts so that the Company can plan and formulate guidelines for correcting and preventing human rights violations.
9. The Company imposes penalties for those who commit crimes of human rights violations, the highest of which is the termination of employment.
10. Remediation for people who are affected by human rights violation is properly set with monetary and non-monetary form as well as consulting and giving suggestions to victims.
11. The Company prevents all the Company's stakeholders from assault, sexual harassment, verbal and psychological abuse, and creates a corporate culture to respect on humanity.

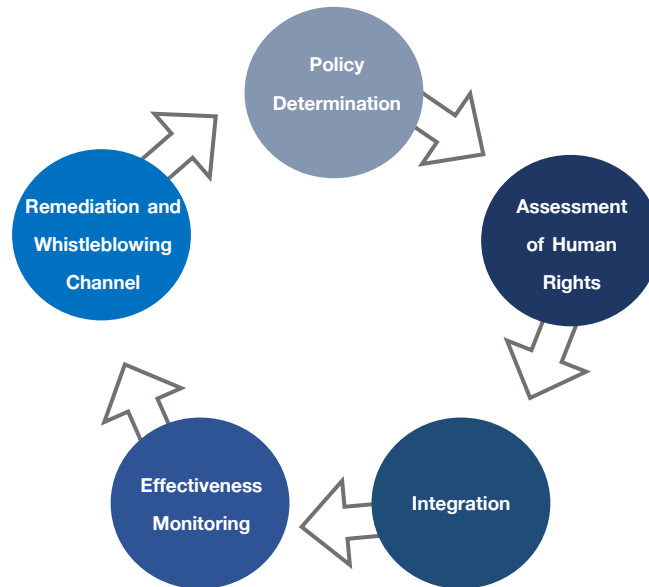
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Procedure of Examination on Human Rights and Labor Practices of Muangthai Capital Public Company Limited



The process of the policy is related to the Company's intention to treat employees with fairness, honor, equal opportunity and having a standpoint with anti-discrimination, none of the violation and other assault that might happen to the subsidiaries, customers and vendors. The Company provides an opportunity to take responsibility for the community and society based on safety and quality of life basis. Besides such basis, the partnerships are a part of business growth which needs to operate business responsibly and to respect on human rights basis of all stakeholders equally following the international practical guidelines for both society and the Company to grow sustainably.

2.4 Intellectual Property Policy

The Company operates the business in compliance with intellectual property laws with a policy not to support any action that infringes intellectual property, such as the use of software. The Company's work system must be licensed and legally copyrighted only and employees are prohibited from installing pirated software on the Company's computer systems. In addition, directors, executives and employees are prohibited to disclose information and keep confidentiality such as financial information, ideas, techniques of the Company's business operation or/and its subsidiaries which are intellectual property of the Company or/and its subsidiaries whether legally registered with intellectual property law or not. Hence, it is prohibited to disclose without permission in writing from the Company or an authorized person.

Guidelines for Directors, Executives and Employees including:

1. To promote and comply with intellectual property rights, copyrights, patent and moral basis strictly including encouraging directors, executives, employees to utilize resources and assets of

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the Company effectively to rise an ability of competition and excellent service toward customers. The Company enhances use of not only products and services which must be legally copyrighted and does not support products or an action that infringe 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 only.
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 individuals.
4. Employees who bring works or information belonging to third parties that have been acquired or to be used within the Company must be reviewed to ensure that they do not violate on the intellectual property of others.
5. Employees who use the Company's computers must use the software according to the license of the copyright owner and only those who have been authorized to use the Company's software.
6. Upon termination of employment, all intellectual properties, 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 by the Company. On 20th November 2017, the Company declared the intention of anti-corruption cooperating with the Collective Action Coalition (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 to all employees through the Company's Intranet (MTCU) and internal journals and specifying the details in the Good Corporate Governance guidelines including such topics in the training of new employees to realize anti-corruption.

The Company realizes that corruption has a negative effect and is an obstacle to the social and economic development of the country. It's a bad business practice causing unfair business which will negatively affect the reputation of the Company both in terms of business ethics competitiveness and is not universally accepted as well as making shareholders, investors and all stakeholders lack of confidence in the organization, the Company therefore regards it as an important principle in operating business not to support businesses, groups of people, or persons involved in pursuing undesirable benefits, whether directly or indirectly from the abuse of authority and ready to cooperate with government, private sectors, the media and international organizations to demonstrate the Company's commitment to fight 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 set guidelines and operates with transparency to be



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regarded as clear guidelines for conducting business, which all directors, executives and employees must strictly adhere to as follows:

1. Directors, executives, employees of the Company are prohibited to perform or accept or support corruption in all approach, directly or indirectly, including its subsidiaries, associated companies, other companies that the Company has control over, business partners and persons who are intermediaries or representatives of the Company.
2. Arrange for a corruption risk assessment in various business activities to identify high-risk work and potential impact and supervision to determine effective measures to prevent or reduce risks including monitoring and evaluation regarded as part of business operations which the directors, executives, and employees at all levels must participate in promoting and supporting the practice, control, follow up and report results to develop anti-corruption measures to achieve the policy.
3. Provide written guidelines or measures against corruption to be consistent with the results of the corruption risk assessment in various business activities following the laws of Thailand against corruption.
4. Because the Company attaches importance to preventing the risk of corruption. So, it does not employ government officers to perform the duties of the Company.
5. Set up an efficient internal control system and appropriate in activities that may have a risk of corruption. Directors, executives and employees at all levels must adhere with caution in the following matters.

- **Political assistance;** assistance whether directly or indirectly, support of money or other forms of political activities must be transparent legitimate, not be intended to induce improper conduct or corruption intent and to be following the authority of the Company.

The Company has a policy of being politically neutral. In the case 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 is evidence and procedural approval for later investigation. The Company supports the exercise of voting rights both local and national level. This is an important rights and responsibility of democracy.

- **Sponsorships and Charitable Donations;** donation or financial support are a 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 legitimate by ensured that the donation or the subsidy is not used as an excuse for corruption. Sponsorships and charitable donations must be properly recorded. There is evidence and approval according to the Company's disbursement process for later investigation.

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6. Directors, executives and employees must not ask, demand and give things or any other benefits to those who have duties related to the Company unless in term of providing or accepting local customs or business practices and traditions or trade customs. It should not have a higher value than the Company specified and follow the regulations of giving or receiving gifts and entertainment.
7. Do not give or accept bribes in the business of any kind neither directly nor through third parties including its subsidiaries, associated companies, other companies under control of the Company, partnerships and individuals can be regarded as intermediaries. In addition, the coordination of the government must be transparent, honest and legal.
8. Procurement must be transparent, honest and legal government regulations and following the Company's procurement policy.
9. Compensation arising from sales promotions or trade discounts, either in money or any valuable assets should be following normal business practices without improper purpose and it must not be a bribe in order to obtain an agreement to do business together including not receiving for the benefit of any person except in the case of giving and receiving without contradicting the anti-corruption policy, which must have clear evidence or documents of receipt to be able to verify.
10. Providing continuous communication and training to provide knowledge on anticorruption to directors, executives, employees, its subsidiaries, associated companies, other companies that the Company has the power of control. The Company has the rights to control the business of agents or commercial institutions and individuals in all fields to encourage a corporate culture that is non-corruption with honest and being responsible for performing duties and responsibilities with details of procedures and penalties in case of non-compliance with anti-corruption measures.
11. This policy covers personnel management processes, from recruiting or selecting, personnel orientation, training, performance evaluation promotion, reward and stipulating penalties that reflect the Company's commitment in anti-corruption by requiring supervisors at all levels to communicate with employees for use in business activities that are under their responsibility and supervise the practice to be effective.
12. The Company has a policy to protect employees at all levels in the organization who reject corruption will not be punished or affected even if doing so will cause the Company to lose business opportunities.
13. Provide multiple secure communication channels that employees and related parties can access for advice on the implementation of anti-corruption measures and provide information or clues or make a complaint confidently without risk to the whistleblower as well as provide an audit process and take appropriate action.

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14. The Company provides procedures for keeping documents for inspection including recording financial statement with sufficient evidence and none of the items are not recorded or unable to explain or is it a false entry. There is a transparent and fair financial status reporting mechanism. There is also an audit process of the internal control process to ensure the effectiveness of the accounting process and data retention.
15. Those who commit corruption are considered violations of the Company's Code of Conduct. Disciplinary action will be taken following the Company's regulations and may be subject to legal penalties if the act is unlawful.
16. The Company has authorized and responsibilities to the Management in formulating guidelines and follow up to ensure that anti-corruption measures are complied with and organize the organizational structure and resources to be consistent with the implementation of anti-corruption measures.
17. The Company has a policy to disclose and exchange internal policies, experiences, good practices and guidelines for success in supporting ethical business practices to accurate and transparent in Thailand. It also has a policy to cooperate with companies in the same industry, partners and other stakeholders by creating a common practice and participation in anti-corruption activities.

Such policies and measures are publicly disclosed on the Company's website (www.muangthaicap.com > Investor Relations > Company Info > Policies > Good Corporate Governance Policies > Anti-Corruption Policy).

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

The Company has aimed at preventing to become a source of money laundering and counter financing of terrorism which impacts the Company's reputation and stability. Therefore, it is important to comply with law of Anti-Money Laundering and Counter-Terrorism and Proliferation of Weapon of Mass Destruction Financing (AML/CTPF) as well as laws, principles of Bank of Thailand (BOT) and other relevant laws.

The AML/CTPF policy is stipulated to be a practical guideline for directors, executives and employees of the Company and its subsidiaries to operate business correctly according to Anti-Money Laundering (AML) Act. B.E.2542 (1999) and as amendment including relevant subordinate legislations. The main focused guidelines are:

1. The Company has a risk management policy, risk assessment procedures and effective risk mitigation measures in relation to AML/CTPF activities, which inclusive of the risk from type of customers, loan and service products, service areas with high-risk, the utilization of information technology.

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2. Know-Your-Customer: KYC Policy, the Company will proceed following the regulations and procedures relating to the KYC as well as to store the KYC records of every customer used for loan issuing process.
3. Client Due Diligence: CDD Policy, the Company will proceed following the regulations and procedures relating to the CCD per following procedures:
 - 3.1 Identify and verify the customer;
 - 3.2 Cross check the customer data in ALMO's "List of designated persons";
 - 3.3 Establish the customer's transaction and data monitoring to maintain an up-to-date information;
 - 3.4 Assess every customer's risk in accordance to their type (ex. occupation, use of fund) as well as areas of residency.
4. Customer Denial and Termination in the case that the customer is having any of the following conditions:
 - 4.1 The customer is in ALMO's "List of designated persons";
 - 4.2 The customer conceals, fakes, provide false information of his/her real name and document;
 - 4.3 The customer does not provide sufficient information or evidence for customer's identification;
 - 4.4 The customer could potentially increase the Company's risk of AML/CTPF;
 - 4.5 The Company must proceed to suspend all financial transactions of ALMO's list of designated persons related customer to resist the AML/CTPF activities. If the previous or existing customer is found being in ALMO's list of designated persons, the Company has a responsibility to report to ALMO immediately.
5. The Company has a responsibility to monitor that the customer's use of loan is not having a potential to be relating to AML/CTPF activities or having ALMO's designed person as an ultimate benefit holder. If found, the Company must report to ALMO office within 7 days.
6. Use of technology to verify customer's information. The Company manages to access to sufficient information and data to verify customer's information to ensure its accuracy in accordance to the regulations, such as the person listed in ALMO's list of designated persons or UN's list of terrorists, by using information technology efficiently.
7. Management of risk of AML/CTPF. The Company establishes measures to assess the risk relating to AML/CTPF in compliance with the AML/CTPF regulations and global standards in order to ensure that the measures are enable to prevent and mitigate the Company's risk exposing to AML/CTPF activity effectively.

Hence, the Company has set the risk management procedures and will revise the data and information of customer regularly, especially the high-risk customers. If found, the customer's related transactions will be suspended immediately.

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8. The Company stores all reports submitted to ALMO, as well as the document and identity verification document and any other required document in accordance to the regulations.

The Company has stipulated regulations, disciplines and guidelines of the Company's criteria practical guideline. Those are reviewed and improved to be recent regularly and to be guidelines of employees to achieve the set goal of the policy. Employees are required to be trained about AML/CTPF knowledge sufficiently and continuously as the Company assigns. Hence, there are monitoring procedures and examination on customers' bank account mutation 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 which is notified to the Company.

The details of AML/CTPF Policy are publicly disclosed on the Company's website (www.muangthaicap.com > Investor Relations > Company Info > Policies > Good Corporate Governance Policies > AML/CTPF Policy).

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, can report complaints or provide information to the Company upon seeing or knowing or have questions or has reasonable grounds to believe in good faith that the Company or its employees have acted in violation of or failing to comply with the law, rules and regulations of good Corporate Governance, business Code of Conduct, policies and procedures that may cause damage to the Company.

Channels for Complaint and Whistleblowing

1. Send the letter by Email (Email : whistleblower@muangthaicap.com)
2. Send the letter by post to the following address:
Mrs. Kongkaew Piamduaytham
Chairman of Audit Committee,
Muangthai Capital Public Company Limited, 332/1 Jaransanitwong Road,
Bangplad, Bangkok 10700
3. Telephone to the whistleblowing receiving department: (+66) 81-751-1587
4. The use of personal information without consent from an owner, a whistleblower can send the complaints to the Data Protection Officer (DPO) via
E-mail : DPO@muangthaicap.com

Scope of Whistleblowing or Complaints

- **If anyone has a clue about the wrongdoing which meets the conditions in the following matters:**
 - 1) Illegal acts against policy/principles of good Corporate Governance or business Code of Conduct.

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- 2) Behavior that may lead to corruption or misconduct to seek unlawful benefits for oneself and/or others such as corruption, embezzlement, fraud, etc.
- 3) Violation of rules, regulations, the Company's Articles of Association.
- 4) Exposure to unfairness in the performance of work or found a defective internal control system of the Company until it is suspected that it may be a channel for corruption or cause to suspect that it may be a channel for corruption or make the Company lose benefit.

Consideration of Whistleblowing or Complaints Processes

1. Received information will be treated as confidential and the name of the whistleblower was not publicly disclosed the complaints without consent.
2. Details of the whistleblowing or complaints must be true, clear, or sufficient to investigate the facts for further proceedings.
3. The response time to the whistleblowers should not exceed 3 days after receiving the whistleblowing.
4. Timeline for processing complaints depends on the complexity of the matter, document adequacy, evidence received from the whistleblowers including documentary evidence and explanation of the whistleblowers but not later than 30 business days.
5. Whistleblowers or complaints will be entitled to protection whether they are employees or outsiders.
6. Complaint receiver and those involved in the investigation process must keep relevant information confidential and will be disclosed as necessary considering safety and damage on the whistleblowers or those who cooperate in the investigation of facts or source of information or related persons.

Measures to Protect Whistleblowers or Complainants

1. The Company will collect information and identity of the whistleblower or the complainant confidential.
2. The Company will disclose information as necessary considering safety and the damage of the reporting person. The source of the information or the person involved in the damage will be mitigated through appropriate and fair procedures.
3. The Company will not treat unfairly to the whistleblower who complains whether by changing job position, job description, workplace, suspending, intimidating, interfering, laying off, or doing any other act that is unfair to the whistleblower or those who cooperate in the investigation of facts.
4. In case of complaints or those who cooperate in the investigation of facts can request the Company to determine appropriate protection measures or the Company may impose

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protection measures by the complainant or the person who cooperates in the investigation of facts without request if it is prone to damage or insecurity.

Complaints or Whistleblowing in Bad Faith

If complaints or whistleblowers is an act of dishonesty or reporting that information is false due to intentional misrepresentation of facts or defamation of others and in case of being an employee, the Company will consider a violation of the Company's Code of Conduct to receive the penalties. If such actions cause damage to the Company, the Company will consider taking legal action.

The details of Whistleblowing Policy are publicly disclosed on the Company's website ([www. muangthaicap.com](http://www.muangthaicap.com) > Investor Relations > Company Info > Policies > Good Corporate Governance Policies > Whistleblowing Policy)

In case of complaints, the Company Secretary will report at the Board of Directors' meeting as well as report on the progress of the complaint handling, both complaints are in the process of investigation or complaints that have already been resolved at least each quarter. The Board of Directors shall receive an overview of the various complaints and the types of complaints reported for that year and at the first Board meeting within the year. The Board of Directors is also required to receive an overview of complaints reported for the previous year.

2.8 Conflict of Interest Policy

1. Prevention on the Transactions that may cause Conflict of Interest

Directors, Executives and employees of the Company must try to 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 business partners, customers, competitors, or from the use of opportunities, assets or information obtained from positions, authorities and duties to seek personal benefits or for another person whether such action will result in the Company damaged whether directly or indirectly.

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

The Company requires its directors and top executives to report their held securities by their spouses to the Stock Exchange Thailand, the Securities and Exchange Commission under Section 59 and penalty according to the Securities and Exchange Act. B.E.2535 (1992), in order to have

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guidelines for performing duties with honesty and not seeking personal benefits that conflict with the Company's interests and following relevant laws.

Guidelines for Directors, Executives and Employees including:

1. Disclosure and submit information of own and related interests to the Board of Directors in order interest immediately prior to the transaction. The Company has stipulated that the Company Secretary is obliged to conduct a regular survey of the list of stakeholders and transactions with interests every year end. The survey will be conducted with both directors, executives and/or related parties including related employees and present the information to the Audit Committee and the Board of Directors acknowledge at least once a year.
2. Avoid transactions that may cause conflicts of interest with the Company or its subsidiaries or making transactions related to yourself and/or related persons and does not act in any manner that is contrary to the interests of the Company or its subsidiaries or is seeking personal benefit and/or related persons.
3. Directors, executives, employees of the Company including the sub-committees who have interests in the meeting in any agenda must not attend the meeting and does not participate in expressing opinions and approving in the agenda considering matters that he or she has interests or have conflicts of interest both directly and indirectly or related persons benefit other financial or any other benefits other than those normally expected or cause the Company or the subsidiaries has been damaged, it is assumed that the action is contrary to the interests of the Company and significant subsidiaries.
 - (a) Transactions between the Company or its subsidiaries with the Company's directors, executives or related persons without complying with the rules relating to transactions with the Company's directors and persons related to the Company or making a transaction related to the relevant laws and announcements including the policy of entering into connected transactions and the operating manual on entering into connected transactions of the Company.
 - (b) Using of the Company's information or its subsidiaries that has foreseen unless it is publicly available information.
 - (c) Using of property or business opportunities of the Company or its subsidiaries that violates relevant laws and announcements.
4. In the case of a normal transaction that has a trade agreement with general trading conditions in the manner that a sensible person would do with a general counterparty in the same situation with the bargaining power without influence in having the status of a director of the Company, an executive or a related person (by case). As the Board of Directors has approved in principle, the Company shall prepare a summary of such report for the Audit Committee and the Board of Directors for acknowledgement and comment for every quarter in which such transactions are made.

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5. Other transactions that are connected transactions which are not normal transactions for the Audit Committee to be considering and giving opinions on the necessity of entering into the transaction and the appropriateness of the price of that transaction first and shall proceed following the rules relating to the legally connected transactions and related announcements.
6. Supervise and be responsible for the Company and its subsidiaries have internal control systems risk management system and appropriate fraud and corruption prevention systems effective and is concise enough to ensure that the operations of the Company and its subsidiaries are following the policies, the Company's Articles of Association, relevant laws and announcements.
7. The Board of Directors must supervise the Company and its subsidiaries comply with the relevant laws. and disclose information following the law and related announcements.
8. Provide a clear work system to show that the subsidiaries have a system that is sufficient in disclosing information on significant transactions following the established rules on a continuous and reliable basis and there is a channel for the Company's directors and the management of the Company able to obtain information of the subsidiaries to monitor the operating results.
9. The Company stipulates that the Board of Directors and executives are defined according to the definition of the Office of The Securities and Exchange Commission. The Stock Exchange of Thailand (SEC) must report their interests and their conflicts of interest and related persons which is a stake related to the management of the Company or its subsidiaries and when taking office for the first time and to report every time there is a change of information on interests following the form approved by the Board of Directors to the chairman check as soon as notified by the Company and when changing information. In order to comply with The Securities and Exchange Act B.E.2535 (1992) and be able to use such information in the examination and prevent conflicts of interest.

2. Measures for Connected Transaction or Related-Party Transactions Approval

The Company has given importance to the prevention of conflicts of interest arising from connected transactions or related-party transactions. In the approval process, the Company carefully consider in conflict of interest, honesty, fairness and independence under the moral ethics and principles of good Corporate Governance. To ensure that the process is honestly, the transaction must be approved by the Board of Directors to prevent the conflicts of interest. Therefore, the Company has set the practices for the approval of connected transaction or related-party transactions of the Board of Directors as follow;

1. Each director must disclose an information or transactions that might lead to conflict of interests or connected transaction or related-party transactions as required by The Securities and Exchange Commission (SEC) and The Stock Exchange of Thailand (SET)

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2. Directors with related interest are prohibited from participating in approval process. In case that the connected transactions have been conducted, the Audit Committee shall participate in giving opinion following the principles of good Corporate Governance and the regulations of The Stock Exchange of Thailand (SET).
3. Loan providing or investment in business that a director has interest, must be approved by the Board of Directors without attendance of such director. To prevent conflict of interests, pricing and terms and conditions must be determined following the Company normal trading and as same as the treatment that given to general customers.

3. Measures to Prohibit Securities Trading

The Directors, executives, including those holding executive positions in accounting or finance who are in the position of the assistant department managers or the equivalent in the Company. Employees in departments related to internal information including spouse or those who live as husband and wife and underage children of such persons who have received inside information must not trade in the Company's securities or other listed companies related to internal information during the period after closing until the date of disclosure of the quarterly and annual financial statements.

In addition, in the case of the directors, executives and employees in the departments related to internal information including spouses or those who live as husband and wife and underage children of such persons knowing the inside information of the Company or other listed companies related to inside information must not trade in such Company's securities until a period of specified above has elapsed since the disclosure of all information to the public.

The Company has prioritized the conflict of interest policy at most. The Audit Committee of the Company has set a practical guideline of conflict of interests, monitored on operational performance and reported on the mentioned guideline practices to the Board of Directors every year. The guidelines must be approved at the meeting and shall be reviewed frequently for processing and managing the control system completely, standardly and transparently. The management shall be following 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 have regulations informing all employees to read and study the policy and sign their acknowledgment that they will comply with the policy.

2.9 Internal Data Protection Policy

The Company has established policies, Code of Conduct, penalties, and has monitored the use of inside information following the law and good Corporate Governance principles for the use of inside information and trading of securities, selling the Company's securities to prevent the

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directors, executives, and employees including their spouses and underage children of the said person from using inside information that has not been disclosed to the public improperly for their benefits or others. The policy requires that the Company's directors, managements and employees to be forbidden from trading the Company's shares during the blackout period which the Company has specified for a period of 45 days.

The Company recognizes to importance of using of internal information by adhering to the principles of good Corporate Governance, integrity moral and ethical business practices accordingly and to ensure that investors receive the reliable information equality and promptly. The Company determines regulations of the Corporate Governance for the using of inside information and the securities trading of the Directors, executives and employees following the Securities and Exchange Commission. The Company aims to accuracy and frank in operating business and prevents the Directors, the Executives, and employees to use inside information for their benefits or to disclose inside information for another such as the reporting of directors and management directors' trading. Moreover, the Company has also imposed penalties for the breach to use inside information in order to their benefits which the penalties are warning until retire the Company's using of inside information policy publicly disclosed on the Company's Intranet and website for all stakeholder, directors, executives, and employees. Including the Company's stakeholders to be informed and encourage everyone to join in acknowledging strictly complying with the aforementioned policy. The details were explained in the annual staff meeting of the Company as well which can be summarized as follows:

1. Directors, executives, and employees at all levels are forbidden to use internal data containing crucial information that has significant impact to the stock price and has not yet been declared to the public or The Stock Exchange of Thailand for trading to the advantage of self or others. Furthermore, the aforementioned parties are to avoid or refrain from trading the Company's stock for 7 days prior to the date of the Company's results announcement date.
2. The Company is responsible for announcing to the public information regarding the Company key decisions and/or actions in a manner congruent with the rules and regulations set out by The Stock Exchange of Thailand via appropriated and acceptable media and channel.
3. The disclosure policy defines to ensure that all investors receive the information equality and promptly.
4. Directors and executives shall report all securities ownership issued by the Company, including those that pertain to self, spouse, and/or underage children, to The Securities and Exchange Commission in conformity with the section 59 of the Public Company Act B.E.2535 (1992) and to the Board of Director on quarterly basis.

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5. The Company specifies a strict policy regarding the protection of the Company is confidential information, and the prohibition of using the Company unpublished information for any benefits to personal interest and others the Company also communicates the use of inside information to all employees since date of all employees decided to working at the Company.

In addition, the Company also communicates the use of inside information to remind all employees. and sign acknowledgment of obligations from the date of the decision to become an employee of the Company by specifying important details in the employment contract for all employees to know and communicate from top to bottom and from the bottom up through various media that, if many, as appropriate.

6. The Company to complying with the laws relating to insider trading in all countries that the Company enters enterprises.
7. Directors, executives, employees of the Company and third parties who come to perform duties who know or possess information the Company's internal information must;
 - 7.1 Keep the inside information of the Company with care and security in order to prevent the internal information of the Company leaked to the outside.
 - 7.2 Do not disclose inside information of the Company to other persons who are not related to the operation to prevent the inside information may be used whether for the benefit of oneself or others as it may affect the price or value of Securities of other companies or listed companies related to inside information or may affect investment decisions.
8. Directors, executives, employees of the Company and third-parties who come to perform their duties who know or possess inside information of the Company must not buy or sell securities related to inside information, which takes advantage of other people who trade in securities without knowing inside information.
9. Directors, executives, employees in all entities dealing with inside information, including related parties, are required to comply with the prohibition measures set forth in this policy to prevent the risk of misuse of inside information.
10. The Company must have a system to maintain and prevent the use of inside information that This ensures that inside information is not leaked and not be used for the purchase or sale of securities, whether for oneself or others.

The Company has arranged to follow up on operations and reported on the operational performance of prevention of the use of internal information to the directors at the meeting of the Board of Directors annually. Each year, all directors, executives and employees are required to review the Code of Conduct and Anti-Corruption Policy and corruption. The contents cover the use of inside information and confidentiality of the Company. It is currently an online review and can be signed to acknowledge compliance with the policy after the review and comprehension test.

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2.10 Personal Data Protection Policy

The Company is a controller of personal information which is responsible for collection, use and disclosure following Personal Data Protection Act (PDPA) B.E.2562 (2019). This is to recognize the personal information security of customers, employees, vendors or partnerships and other relevant owners to prevent a breach of personal data and to be an internal controlling measure of personal data process and a good measure of personal data protection standardized with laws and regulations of the Office of the Personal Data Protection Committee (PDPC) and other regulatory agencies which the government supervises as well as to be accordance with the policy, practical notifications and other commands of the Company. In addition, the Company's personnel; executives, employees and relevant stakeholders, shall have understanding knowledge of personal data protection and empathize the compliance with the practical guidelines strictly.

2.10.1 Respect of Users' Privacy Rights

1. The Company respects and gives significance to individual rights, personal information and personal information protection. The Company realizes that users of its electronic transaction service or any other services would wish to be assured of security in using the services from the Company.
2. Personal information received by the Company, such as name, age, address, telephone number, I.D. number, vehicle and land registration number and financial information that can be used to trace an identity, that is complete, accurate, up-to-date, and of good quality will be used only for the purpose of the Company's operations. The Company shall use stringent security measures so that personal information may not be used without permission.

2.10.2 Collection of Personal Information

1. In regard to collection and preservation of personal information, the Company shall use lawful and fair means to limit collection and storing of personal information. It shall only be used for services stipulated in the objectives of the Company.
2. The Company shall obtain users' consent prior to collecting personal information except in the case that:
 - (1) It is an exception prescribed by law.
 - (2) It is for users' benefit but consent cannot be obtained at that time.
 - (3) It is for the benefit of users' life, health, or safety or the life, health, or safety of other service users
 - (4) It is for the purpose of legal investigation or inquiry by officials or court proceedings.
 - (5) It is for study, research, or statistical data collection.



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3. The Company shall not collect personal information about religion, genetic traits and sexual behavior, or information that may be detrimental to personal reputation, or information that may cause unfair discrimination to any person except in the case that:
 - (1) Users' written consent has been obtained.
 - (2) It is an exception prescribed by law.
 - (3) It is for users' benefit and consent cannot be obtained at that time.
 - (4) It is for the benefit of users' life, health or safety or the life, health, or safety of other service users.
 - (5) It is for the purpose of investigations by legal officials or court proceedings.
 - (6) It is for study, research, or statistical data collection
4. The Company may integrate users' personal information with information received from other sources only as necessary and with users' consent, for the purpose of updating personal information and improving the quality and efficiency of the Company's services.

2.10.3 Consent of Personal Information

The data process has to be clearly approved of consent from personal information owners except as prescribed by law.

1. A request for consent needs to be a written form or through online platform as provided.
2. A request for consent needs to be informed with proposes.
3. Texts in the form need to be clearly separated to be accessible and not to be misleading or misunderstanding.
4. Recognize the owners' freedom and a contact without attached conditions of consent.
5. The personal information owners are able to withdraw the consent any time.
6. If the consent withdrawal impacts the owners, it is important to notify the owners to acknowledge.
7. If a request for consent is not related to conditions as required by law, it is incomplete.

2.10.4 Use of Personal Information

1. The Company may use and disclose personal information only with users' consent and when it is following the Company's objectives.
2. The Company shall ensure that it shall not disclose, show, or cause to appear the users' personal information in any other manner other than that specified in the Company's objectives or to a third party except in the event that:
 - (1) It is prescribed by law.
 - (2) It is with the users' consent.
 - (3) It is for the benefit of life, health or safety or the life, health, or safety of other service users.
 - (4) It is for the purpose of investigations by officials or court proceedings.

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- (5) It is for study, research, or statistical data collection.
3. In certain cases, the Company may allow other persons or agencies/organizations to have access to or use users' personal information as necessary, for the purposes of and under the authority of the Company, and with prior consent of users.

2.10.5 Security Measures

1. The Company recognizes the importance of personal information security and has set up security measures that are appropriate and consistent with confidentiality of personal information. The measures aim at preventing loss, accessibility, destruction, use, modification, amendment or disclosure of personal information unlawfully or without authority. These measures shall be consistent with the Company's policy and guidelines of IT security.
2. The Company assigns personnel to be responsible for personal information protection. Personal data protection officer, whose duty is to give advice on the practice, to ensure that the compliance is in place, coordinate when there is a problem and ensure the confidentiality of personal information that the officer has accessed by the duty.

2.10.6 Users' Rights to Personal Information

1. In the event that users' wish to obtain their own personal information, they may send a request according to the criteria and methods set forth by the Company. Upon receipt of such request the Company shall take prompt action to inform users of the existence or details of such personal information within a reasonable time.
2. If any personal information is found to be incorrect, users may notify the Company and request that such information be corrected, changed, or deleted. In that case the Company shall prepare a memorandum of objections regarding storage and accuracy of personal information.
3. Users have the right to check the existence and the nature of personal information, and the use of such information at the business premises of the Company. In addition, users have the right to request:
 - (1) certified copies of documents relating to their personal information
 - (2) rectification or change of personal information so that it is accurate and complete
 - (3) discontinuation of the use or disclosure of their personal information
 - (4) deletion or destruction of their personal information
 - (5) information about the method of acquisition of their personal information in the case that information has been collected or stored without their consent. Nevertheless, the Company may deny the request if required by law or if identifiable personal information has already been deleted.

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2.10.7 Whistleblowing Channel

- 1) Send a complaint to Compliance department or Data Protection Officer (DPO)
(Email : Dpo@muangthaicap.com)
- 2) Send a complaint by Email (Email : whistleblower@muangthaicap.com)
- 3) Send a complaint by post to the following address:
Mrs. Kongkaew Piamduaytham
Chairman of Audit Committee
Muangthai Capital Public Company Limited, 332/1 Jaransanitwong Road,
Bangplad, Bangkok 10700
- 4) Telephone to the whistleblowing receiving department: (+66) 81-751-1587

The details of personal information protection policy and measures are publicly disclosed on the Company's website (www.muangthaicap.com > Investor Relations > Company Info > Policies > Good Corporate Governance Policies > Data Privacy Policy and Information Security).

2.11 IT Security Policy

The Company has an intention to service and provide services operating together with appreciation, belonging to the business policy and prevention of issues which might occur in the IT network system from users' wrongdoing and threats. Therefore, the Company supervises an information security policy to be a practical guideline for examination and information security to create the security and continuously service the customers as well as decrease of the IT risk; cyber threats, to place reliance on the service.

The Company realizes risks of information and IT security which might impact on the performance results of the Company significantly. In case of personal data breach or IT security system destroying, the Company has set an elementary security basis, system security and IT processing device related to the customer service, according to ISO-IEC 27001:2013 Information Management Systems standard as well as procedures and criteria following relevant law of IT security. Hence, the Company supervises a policy, measures and prevention of the mentioned risks to be a practical guideline for directors, executives and employees to acknowledge and understand the importance of information and avoid an action which effects on the Company's information security. The Company has developed the system and examined frequently.

Guidelines

1. The information security is basic criteria of information security development on process and secure system to be suitable for the Company's business operations. Such specific policy is properly set following the business principles, law and relevant regulations. Hence, a measure and/or related instruction might be supervised supporting compliance with the policy.



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2. The Company's executives and employees as well as outsiders who are associated with the Company's information, shall understand, agree and comply with information security policy guideline.
3. Information Security working group is the owner of the policy, responsible for contents of the policy management and reviewal at least once a year to be related to changes and tendencies of risks in future that might impact on the Company's information security such as strategic changes or information technology (IT) direction, or essential changes in the Company's structure or technology, etc.
4. Information Security working group shall assess the effectiveness of compliance with the policy to improve contents of the policy or a strategic plan to comply with the policy within the Company to be effective.
5. The information security policy is in writing as the objectives and scopes which has to be approved by executives or the Board of Directors. Such policy has to be notified to all personnel at all levels of the Company to comply with, effective from executives, employees to outsiders who are associated with the use of information assets of the Company.
6. Executives, admins and users who use the information including other information assets, are directly responsible for supporting the process and compliance strictly. Other relevant users but not responsible for information asset management, shall also participate in compliance with the policy. The policy infringe is a serious crime which has an ultimate punishment as the Company's regulations.

Due to the exponential increase and more targets of cyber threats nowadays, the Company realizes the importance of cyber security which has to be examined and continuously developed. Therefore, the Company has strived for higher standard for cyber security with concise and cautious procedures. The security measures consist of improvement in preparing for, defending against, and responding to threats, as well as system recovery to be functional as usual to defend against the threats in every dimension. Besides improving monitoring capabilities, the Company personnel's realization is one factor that keeps the information secure. Hence, the Company has educated its personnel about information security covering content of cyber security knowledge.

To ensure that the policy and the information security measures relating to the customer service are effective, secure and to continuously service, the Company has examined the information security regularly at least once a year and reported the result to the Board of Directors or an assigned committee. The examined result is publicly disclosed to all the Company's internal departments to practice, and sent as a copy to Bank of Thailand (BOT) within 45 days since the examination day has finished including monitoring the examination of bill payment system service under the BOT governance and sending reports as required by regulations for avoiding violation of laws. Therefore, the details of information security Policy covering IT Security policy are publicly

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disclosed on the Company's website (www.muangthaicap.com > Investor Relations > Company Info > Policies > Good Corporate Governance Policies > Information Security Policy)

2.12 Procurement Policy

The Company stipulates the procurement policy to be 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 facilitates the existence of the Company's business. Therefore, the procurement process is determined to be following the regulations. The process is fair, reasonable, transparent and can be verified that there is no conflict of interest and treat partners equally with fair competition to achieve the most beneficial operations for the Company.

Guidelines

1. The purpose of the procurement must be clearly stated and presented to the authorized person according to the Company's procedures.
2. The prices from sellers or service providers are compared transparently and fairly to all parties. Accepting financial benefits or other forms of benefits from sellers or service providers in exchange of goods or services that do not meet the terms of the agreement or the specifications not meeting the order or quality or not reaching the standard is prohibited. In the case that such event is found, the employee shall immediately notify the Assistant Purchasing Manager to cooperate in finding the solutions.
3. The Company has treated the vendors and creditors fairly, equitably and without taking advantage. We comply with trade conditions and/or strict contractual agreements made altogether in order to develop mutually beneficial business relationships. Besides, the Company has a policy to treat partners equally and fairly taking into account the best interests of the Company based on fairness to both parties. The situations that cause conflicts of interest are avoided including the compliance with commitments to provide real information, accurate report, strict compliance with the conditions agreed upon with the vendors. In case of failure to comply with any of the conditions, the advance notification is needed in order to jointly consider finding ways to revise the criteria for selection of vendors covering 6 areas as follows:
 - 1) Technical competence
 - 2) Financial status
 - 3) Expertise and experience
 - 4) History related to complaints
 - 5) Conflicts of Interest / Connected Transactions
 - 6) Anti-corruption policy and quality policy
4. The Company has a policy, practices and regulations in procurement taking into account social and environmental issues as an element in the consideration.

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- 4.1 The Company has a risk assessment on major partners using the criteria considered from the top 10 annual purchase amounts to assess the risks from partners in all 3 aspects, partners economic, social and environmental aspects. According to the assessment results of all 3 aspects, the partners who will pass the evaluation criteria must have the level of risk within the criteria that is not high.
 - 4.2 For the partners who purchase goods and services for the first time, the Company has criteria for selecting New Approved partners. Such assessment will cover social and environmental issues.
5. The Company has a policy to strictly comply with the conditions, contracts and obligations agreed upon with creditors whether it is about the purpose of using money, repayment, quality care, collateral and any other matters that have been agreed upon with creditors. In the event that one of the conditions cannot be complied with, the Company will notify creditors as soon as possible to join a consideration of finding a solution using the principle of reasonableness. The Company is committed to maintaining sustainable relationship with creditors and mutual trust. The approaches are determined for capital management to create strong stability and to prevent the Company from being in a difficult position of debt repayment to creditors and to give importance to financial liquidity management by planning to pay debts to creditors clearly and punctually.
6. The Company has a plan that helps develop sustainable business operation of partners. The Company will inform the plan for the number of branches to be opened within the Company policy year to partners in advance. Such plan is based on the branch opening policy plan from the branch affairs department for the policy year. Notification of such plan will help promote partners to be able to know the quantity of products or services to be sold this year. In addition, partners will be able to bring information about the obtained plans to plan the production and delivery in order to help prevent the problem of late delivery or the out-of-stock products insufficient for the delivery.

Category 3 : Stakeholder Responsibility Policy

The Company places an importance on stakeholder engagement as a basis for accurately and thoroughly identifying sustainability aspects based on their priorities and necessities. The Company has also established guidelines in writing for stakeholder responsibility in Corporate Governance and Corporate Social Responsibility Policies. Stakeholders are divided into 7 groups: shareholders/investors/creditors, customers, employees, vendors, competitors, communities/society and regulators. Relevant internal departments will engage the stakeholders through CSR-in-process activities, such as meetings, seminars, customer opinion/satisfaction surveys, employee engagement surveys, engagement on community/society activities and caring of environment. This will obtain the

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information needed to determine appropriate actions in response to the interests and expectations of stakeholders.

3.1 Policy and Guidelines for the Practice towards Customers

The customers' satisfaction and reliance toward the Company are important to concentrate on creating an innovation in product and service design and development as well as improvement of the operating process to present a better quality of products and excellent service to customers, considering to the customers' demand and benefits at most. The Company has operated the business with customer centric under the slogan "**Intimate Services Like Closed Family Members**". The Company is responsible for its customers and maintain the confidentiality of customers including the creation of new innovations for the convenience and fast. The Company has established the policies and guidelines for dealing with customers focusing on the responsibility to customers covering the customer needs, customer satisfaction, the essential rights of customers, concise and appreciated disclosure of product and service information and responsibility for advertisement to prevent the use of customers' misunderstanding in a wrong way.

Guidelines

1. The Company's business operations are a service-related business which is the key to making the business successful, progressive and sustainable. The Company has set the service as the 5th mission statement that "The Company will provide excellent service and create the highest customer satisfaction." It is in line with the Company's slogan which is "Intimate Service Like Close Family Members" for all employees to treat customers as the mission and slogan that has been set.
2. In presenting the loan approval conditions, the Company will present the conditions and/or the benefits that customers will receive in a transparent and clear manner in order to benefit the customers as much as possible.
3. Realize the importance of customers' personal information protection which is collected, disclosed and transferred due to the service. The use of personal information management is set to achieve the service goal as requirement and appreciation. The Company operates with frameworks according to Personal Data Protection Act (PDPA) by providing service through online channels and customer service center (Call Center).
4. The Company gives customers the opportunity to complain about the service provided by employees directly to the complaints receiving department at the Head Office by calling at (+66) 2-483-8888.
5. The Company provides a policy for whistleblowing, monitoring and protection of the whistleblower's rights.



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6. In the event that customers face financial crises caused by natural disasters affecting the public such as floods, delays in payment of rice sold to farmers, etc., the Company will have measures to provide an assistance to customers as appropriate

3.2 Policy and Guidelines for the Practices towards Shareholders / Investors / Creditors

The Company has built reliance on its shareholders, investors and creditors by treating 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, punctually, and takes care of various collaterals completely, including not using the loan in a way that is contrary to the purpose. Furthermore, the Company has no policy to disclose information that causes damages to creditor. In the case that one of the conditions cannot be met must notify creditors in advance to jointly consider a solution.

Guidelines towards Investors/ Creditors

1. The Company respects the rights of investors and creditors equally by attaching great importance to the disclosure of financial information and general information correctly, sufficiently, transparently, and in a timely manner for investors and creditors to make decisions. The Company has a policy to strictly comply with the conditions, contracts and obligations agreed with investors and creditors whether it is about the purpose of using money, loan repayment, guarantee terms, guaranteeing the quality of collateral and any other matters that have been agreed upon with creditors.
2. The Company has never had any dispute in regards to the default on debt settlement. The Company pays the money to the creditors following the payment terms agreed in advance.
3. Monitor the payment of loans and interests to creditors by the due date and complete comply with loan covenants according to the agreement. In the case, that the Company is unable to comply with any condition of agreement, the Company will immediately inform the creditor so as to find a reasonable and mutually-acceptable solution together.
4. The Company provides correct and honest status and financial reports to creditors periodically.
5. The Company has established a strategy in treasury function to promote security and strength in capital management to prevent the Company from experiencing difficulty in repaying creditor. There is also liquidity management to repay debt on maturity in timely manner.

Shareholders Responsibility

The Company recognizes and places importance of the shareholders' rights equally, for instance, the Company does not commit any actions that restrict the rights to vote or opportunities to access to its information. Hence, the Company provides channels for communication with the shareholders and investors through the Company's Investor Relations department consisting of professionals in investment. The Investor Relations department is responsible for coordinating and



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disclosing information or documents for shareholders as well as the shareholders' rights information on the Company's website to facilitate the shareholders.

In addition, the Company arranges the notice of the Annual General Meeting of Shareholders and provides information in Thai and English to facilitate foreign shareholders with recognizing convenience and equality of shareholders. Therefore, the Company establishes a policy of shareholder facilitation and engagement on participation in the AGM on Good Corporate Governance guidelines (www.muangthaicap.com > Investor Relations > Company Info > Policies > Handbooks > Good Corporate Governance Guidelines).

3.3 Fair Practices towards Employees

The Company realizes that being able to continuously expand the business and have stability is the result of cooperation of all employees at all levels who are determined to work in order to achieve the goals set by the Company. The policy and guidelines are set to treat employees equally and fairly at all levels without exception such as remuneration, promotion, training, health, safety, career path growth and establish a Welfare Committee in the workplace which is responsible for managing the operation plan and labor relation activities coordinating with relevant agencies.

Guidelines

1. The Company provides appropriate compensation according to the knowledge and abilities of each employee. This can be compared with companies that operate the same business as well as taking care of the working environment by considering the quality of life and safety at work. In addition, we offer proper care, assistance and welfare for employees.
2. The Company has developed the Company's personnel in every position and every level continuously. The emphasis is placed on organizing training and seminars on an annual basis by inviting speakers with knowledge and reputation to train. Thus, the employees can learn and continuously develop their potential and skills.
3. The Company provides training within the organization and outside the organization according to related fields. The training can increase the potential of employees and executives by formulating human resource development policies and guidelines. The average number of hours of employee training per year are disclosed.
4. The Company has a system for assessing merit and fairness by disclosing the assessment criteria to employees at all levels for acknowledgment.
5. The Company has a policy to encourage employees at each level to progress and be able to continuously grow in the organization.
6. The Company provides opportunities for employees at all levels to participate in questioning or expressing opinions, both directly and indirectly, which will bring benefits in solving problems altogether.

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Module 1 : Employment

The treatment toward employees is accordance with the good Corporate Governance principles and Code of Conduct equally and fairly by offering a good experience to employees at every moment of career path. The Company recognizes the importance of employees' competence development by determining creating of equality and discrimination of gender, race, religion and culture.

Employees are considered to be the main driving force for business. Therefore, the selection of personnel to work with the organization is an important step and has a huge impact on the organization. The Company has a recruitment and selection process as follows:

1. Explore the needs of employees from all departments, as well as follow up on business expansion plans that include new branches or changes in operational processes.
2. Coordinate with the head of the department who requires an employee in order to set up the qualification criteria for the position in detail.
3. Job availability will be announced through the recruitment website by communicating clearly to applicants for acknowledgment of work details and responsibilities.
4. Carefully screen applications in all dimensions fairly and conduct interviews by selecting people with knowledge, competence, ethics and good attitude to qualify as the Company specification.
5. Be a part of the development of the organization to achieve the set goals along with self-development and continuation of the knowledge gained.

The Company attaches importance to recruiting personnel and attracting potential personnel along with preparing and developing the potential of diverse personnel different expertise to be effective personnel. They are "Morality, Exertion, Perspective, Harmony, Discipline" according to the Company's 5 values. Therefore, the Company should maintain suitable recruitment and sufficient personnel to keep these personnel to grow continually. Therefore, it is very challenging and necessary for the Company.

Module 2 : Employee's compensation

The Company has a fair and competitive compensation policy in the market. Including creating stability in the career and have fair career advancement opportunities. It also provides various welfare benefits for the employees of the Company. As required by law, such as social security and other than what is required by law, such as medical expenses, as well as other types of assistance such as travel expenses, fuel expenses, assistance in case of father, mother, child or employee death, etc.



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Benefits and welfares

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

Welfare and allowance	Employees	Contract workers
Health insurance, life insurance and accident insurance	✓	
Medical expenses (themselves)	✓	
Special price for the Act of motorcycles and cars	✓	
Parental leave rights	✓	
Maternity allowance	✓	
Marriage allowance	✓	
Statutory compensation up to retirement age (Employees who have worked for more than 20 years, more)	✓	
Provident Fund Contributions	✓	✓
Special accommodation for employees	✓	✓
Gym (Head Office Building)	✓	
Others (New Year's party, local sports competition, annual travel, marathon race, CSR activities)	✓	✓

For various benefits and welfares, the Company communicates information through various channels such as the MTC University system, e-mails, circulars, and the creation of public relations boards. This is for the Company's personnel to know about benefits as well as obtaining various benefits effectively.

Long-term returns

Apart from the regular salary and remuneration depending on the performance, the employees also receive remuneration from the revenue sharing of the Company. This type of compensation sharing gives employees a sense of involvement in the ownership of the Company. This sense of involvement has a clear positive impact on the business operation continuously. The resignation of employees in key positions (Key person) is detailed in the report with number of employees retired by working age.

Other welfares

1. Insurance
2. The Company provides health insurance, life insurance and accident insurance to facilitate the medical treatment as well as creating stability for the employees and their families. In addition, the Company also provides special welfare as annual medical expenses for employees at all levels.

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3. The Company allows employees to buy Motorcycle Act and personal cars at a price for employee.
4. Benefits in the form of contributions The Company provides benefits in the form of contributions for various occasions such as marriage allowance, financial support in case of childbirth. The Company and employees have established the Fund to help fellow employees in case of death in the family, etc.
5. Accommodation for employees to reduce the cost of living for employees, the Company provides accommodation for employees by allowing employees to stay at the branch building if necessary. Besides, the employees stationed at the Head Office will be allowed to stay at the dormitory of the Company which is located near the Head Office building in Bangplad, Bangkok.
6. Place for exercise in the Head Office building. The Company provides a fitness facility in the Head Office building which includes standard fitness equipment. It is the space for employees and executives at all levels including shower room without collecting additional expenses from employees.
7. Relationship building activities. As working in team is considered the core of the operation to achieve success and the most effective and it is the main organizational culture of the Company, the Company has organized activities to connect relations between employees including New Year party activities, sporting events within the area nationwide, Company's annual tourism activities, marathon competitions organized by external organizations (through sponsors) including social activities (CSR). The employees are given the opportunity to contribute to society and the communities in which they are involved.
8. Legal compensation for retirement age. The Company has a legal reserve for employees aged 20 years or more who have the right to receive compensation at 400 days on the retirement date when the employees reach 60 years of age under the Labor Protection Law No. 7.
9. Provident fund for employees Apart from general remuneration, the Company also established a provident fund following the Provident Fund Act B.E. 2530 (1987). The Company and its employees contributed to the fund on a monthly basis at the rate of 3-5 percent of the salary. This provident fund is managed by Kasikorn Asset Management and will pay back to the employees when such employees retire following the fund rules of the Company.
10. Motorcycle helmets due to the duties and responsibilities, most operational employees need to use motorcycle as vehicle to perform duties. Therefore, the Company provides helmets to employees according to the Company's safety policy. The employees are required to comply with laws that force motorcyclists to wear helmets every time for the

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safety of employees themselves and relieve the severity from unexpected accidents that may occur.

Module 3 : Personnel potential development

The Company has a policy to promote personnel development. Effective training can help people increase their operational efficiency and change their attitudes towards work as well as helping to improve the quality of operations regularly. Therefore, the development of the Company's personnel is considered the key to the survival of the organization. It also creates growth for the organization. It helps increasing knowledge, understanding, attitude and working skills towards personnel. The task of developing knowledge, understanding and skills to be proficient in the performance is therefore an important duty.

Human Resources Development Program

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

1. Performance training consists of different courses for different development objectives of employees at different levels such as new employee orientation training, excellent service training, training on debt acceleration techniques by telephone and on site, management technique training.
2. Training in effectiveness consists of compulsory courses intended to enable employees to perform their duties and to clearly measure the results after the training. The results of the Company's performance were measured after the brokerage training course and the insurance renewal course.

After the personnel have developed their skills and the knowledge necessary to work, the Company has a performance measurement process (KPIs) also known as the "MTC Model" which is a standard for employee performance evaluation. The rate of remuneration of personnel will depend on their performance. The Company will assess each person individually through a 360-degree assessment. The Company's personnel will be assessed on an impartial, transparent and fair performance.

Module 4 : Occupational health and safety at work

Safety and occupational health of employees is what the Company prioritizes with the realization that safety and good health are fundamental rights that everyone deserves. In addition, investment in safety is considered as an important risk prevention of the Company. The number of accidents that occur to the Company would have a huge impact on the Company, whether it was the confidence of the personnel towards the Company property damage as well as the reputation of

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the Company. From this reason, the Company is committed to developing safety as well as enhancing the Company's culture safety to occur continuously.

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

Occupational Health and Safety at Work Policy

The Company is concerned about the life and health of all employees. The Company has established a safety policy in the workplace to create knowledge and understanding for all personnel to cooperate in complying with the policy. In order to make employees aware of the importance of safety at work, the Company has set a policy to adhere to the guidelines for operating safety as follows:

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 following the Company's rules. All employees are required to wear helmets during operation.
3. Encourage employees and partners to participate in safety, occupational health and work environment.
4. Provide risk assessment and potential hazard prevention in terms of safety, occupational health and 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 Capital Public Limited.
5. The Company should improve its skills and educate employees about the importance of safety, occupational health and 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. Understand the skill level of employees.
7. The Company provides resource support for the development and operation of safety, occupational health and work environment.
8. The Company believes that safety, occupational health and working environment are the responsibilities of all departments of the Company.



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Guidelines

1. Protect the health and safety of employees. Customers who come to contact the affected people to carry out all activities in an environmentally responsible manner by providing adequate and hygienic facilities such as toilets Standard drinking water dispenser etc.
2. Safety at work is the first responsibility in the operation of all employees.
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 create employee engagement such as organizing training preparation of public relations boards, etc.
5. Supervisors at all levels must act as a good role model. Always lead the training and motivate employees to work in a safe way.
6. All employees must consider their own safety colleague as well as the Company's assets throughout the working period.
7. All employees must take care of cleanliness and orderliness in the work area. For the safety and good hygiene of all employees.
8. All employees must supervise and cooperate in projects related to the Company's safety and health.

Module 5 : Fair Practices towards Employees

The Company has policies and practices for employees equally without exception and fairness to employees at all levels both in terms of compensation employee transfer, training, occupational health, safety and career growth, including labor protection and establishing a welfare committee in the workplace who is responsible for managing the operation plan and labor relation activities as required by law.

Policy to promote the underprivileged

The Company recognizes the improvement of the quality of life of the disabled or vulnerable groups. People with disabilities are encouraged to show their ability to generate income and self-reliance as well as reducing the burden of family and social adoption. This includes encouraging the disabled to become an important force in strengthening the family and national economy. The Company implemented Section 33 of the Law on the Promotion and Development of the Quality of Life of Disabled Persons B.E.2550 (2007), employing people with disabilities and remitting money to the promotion and development fund for the quality of life of the disabled, fully complying with the rules stipulated by the law.

3.4 Policy and Guidelines for the Practices towards Business Partners

The Company attaches great importance to the selection of suitable partners by ensuring that the selection process and treatment of business partners are fair and equitable. The Company places great importance on having a reputable partner with good ethics and professionalism who

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can comply with the specified conditions. The Company improved the supply chain management policy by specifying the effects and economic risks, society and environment of business partners in evaluating key business partners of the Company such as the management on Corporate Governance, the risk of violating environmental and labor laws, etc., in order to contribute to sustainable business development.

Guidelines

1. Not demanding, accepting and giving any wrongful benefits in any form to our partners.
2. Any bribes are offered or raised, disclosure to partners must be executed and joint solution must be acted fairly and quickly.
3. Agreed commitment must be complied strictly, we shall notify any concern conditions to trading partners in advance to jointly find solutions.

- **Criteria for Selecting Partners**

- Social responsibility and customers treating

1. Deliver products on time
2. Not receive any item or benefits
3. Maintain product image standards and claimable products
4. Feedback from customers is welcomed to improve and develop the products to meet customer demands

- Social responsibility and treating of employees of the vendors

Having well-managed human resource management services from partners will help reduce risks about the quality of products and services in order to deliver goods on time. For example, if a vendor gives poor care to employees such as paying unfair wages, the frequent impact will be the frequent turnover of employees of vendors. This causes risks in business operation in the future such as the risk from receiving items that are not on schedule, the risk of getting poor quality products due to insufficient staffs and no expertise in the job.

- Other social responsibilities

The contribution is made to society with the donation of money or things, creation of public benefits such as ambulances, schools, overpasses, donation of computers or things, etc.

3.5 Policy and Guidelines for the Practices towards Competitors

The Company attaches importance to treating competitors by conducting business within the framework of ethics, ethics and good competition rules. Comply with relevant rules and regulations, do not damage the reputation of competitors, and have to seek for confidentiality honestly or improperly. Don't take advantage of competitors, don't illegally obtain confidential information, and

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don't infringe copyright. Or the intellectual property rights of illegal competitors, including supporting cooperation with competitors to benefit consumers. This is not to monopolize market share, nor to damage the reputation of business competitors through malicious accusations.

Guidelines

1. Comply with the rules of the competition well.
2. Non-confidential information to competitors by means of dishonest or improper.
3. Do not damage the reputation of competitors.

3.6 Community and Society Development and Responsibility

The Company has a social responsibility policy by participating in community development to adhere to local traditions that the Company establish and carry out activities with communities regularly, both public and private sectors, such as:

- **Religion Dimension** : The Company has arranged the Kathin ceremony every year at least 2 temples a year. The Company is the host to gather the things to offer to the temples. The Company has continuously practiced as a tradition since its establishment until now by rotating around the area where the Company is located. This is in order to carry on the traditions that have been passed down from generation to generation and to create unity among the people in that community.
- **Economic Dimension** : The Company sets the main goals of economic sustainability development in developing the access to funding sources and reducing the economic disparities of people. This reflects the business philosophy of the Company in the loan products, interest rates and fees, service standards and performance indicators of the Company and community investment.
- **Education Dimension** : The Company has donated scholarships to students and financial support for schools located in the same community as the temple. Since 2012, the Company has started a project to build a child center building under the name "Ban Mai Khong Noo Project" by continually building a child care center every year which will rotate according to the area of the branch.
- **Social Dimension** : The Company has established a social sustainability development strategy focusing on the development of the community and society to be stronger and become part of the community. This starts with the development of direct stakeholders, namely personnel and customers of the Company through the Company's related policies and communities at the Company's branches located through the Company's various CSR projects.

Every June of the year, the Company invites its employees to participate in blood donation of the Thai Red Cross Society. This tradition has been continuously practiced for years including



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supporting local traditions such as the long boat race tradition, the worshipping tradition, dragon costume parade tradition, etc. In addition, the Company has formulated policy to prohibit employees at all levels from dealing with drugs of any kind, either as a trader or a drug user. There is drug testing from employees once a year under the project “White Company”.

3.7 Policy and Guidelines for the Practices Towards Regulators

The Company performs the business operation under a personal loan business license and a micro loan business license under the supervision of The Bank of Thailand. Therefore, the Company is obliged to operate the business following the supervision guidelines for business operators under the license. This includes fair Market Conduct and reporting of information to relevant regulators in a correct, transparent and timely manner.

Category 4 : Environmental Responsibility

Although the Company is a financial business and the process of the business does not directly impact on the environment, it cannot deny that the existence of the Company also causes the environmental issue due to the use of natural resources; fuel, electricity, etc. Hence, the Company set a policy of an effective use of resources and build an awareness among employees to focus on environmental conservation. According to the policy, it set to start from the environment at work place by complying with 5S activities; Sort, Set in order, Shine, Standardize and Sustain, which are held annually. The Company has managed the use of equipment within the office under the provided budget, and encouraged to be aware of economically use of resources.

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

1. Strictly abide by environmental laws and regulations.
2. Select technologies and operating procedures that meet environmental standards and encourage the utilization of standardized innovations, such as using renewable energy from solar energy by solar cells technology and paperless projects using E-Receipt technology.
3. Support the reuse of double-sided paper and use environmentally friendly paper products instead.
4. Shut down the air conditioner and power supply during the period of suspension or when the management personnel and employees are not in the office for a long time.
5. Garbage classification and reuse of some resources, such as plastic boxes and bags.

The Company has set a corporation of environmental conservation in daily life, communicating with all employees to acknowledge and be aware of. The energy conservation consists of resource utilization, environmental preservation, reuse, recycle, reduce, etc. The Company recognizing the environmental conservation and consequences of climate change risks,



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has prepared counter measures following the international standards. The additional details of environmental responsibility are disclosed on the Company's sustainability website (www.mtcsustainability.com) or sustainability report (www.muangthaicap.com > Investor Relations > Sustainability > Download > Sustainability Report)

Category 5 : Code of Conduct of the Directors

The requirements for the Board of Directors of Muangthai Capital Public Company Limited is committed to complying with ethical standards for the most beneficial for the shareholders and stakeholders under principles of Securities and Exchange Act; if directors of the board of directors do not comply with Section 89/19 of the Securities and Exchange Act, they will be subject to punishment of Section 281/5 as the identical Act. which if not complying with Section 89/15 paragraph 1 and 2, will be punished with no more than a 100,000 Baht fine and a 3,000 Bath fine per day during a period of wrongdoing. Moreover, the chairman of the board of directors who does not comply with Section 89/15 paragraph 3 will be punished with no more than a 100,000 Baht fine and a 3,000 Bath fine per day during a period of wrongdoing. Therefore, the Company set the Code of Conduct to be practical guidelines for directors as follows:

5.1 Director's Code of Conduct towards the Company

Guidelines

1. Perform the duties with honesty, transparency for the best interest of the Company and do not act in a manner that may cause conflicts with the interests of the Company.
2. Apply knowledge and management skills to their full potential.
3. The directors will adhere to the laws, rules and regulations related to business operations under the principles of good Corporate Governance including directors and senior management. This must be notified to the Board of Directors or the person assigned by the Board of Directors regarding the trading of the Company's shares at least 1 day in advance of trading.
4. Buying and selling shares of the Company, executives and all management including close people (spouse and underage children) refraining from buying, selling or transferring the Company's shares in the period before the disclosure of the financial statements. In the event that the financial statements have been announced to the public, if there is the purchase or sale, the secretary must be notified to prepare a report on the change of securities holding (59-2) to the SEC within the specified time. The securities holdings of directors are reported to the Board of Directors' meeting every quarter.
5. The connected transactions and stakeholder reports of directors and executives to prevent conflicts of interest of directors and executives must be reported to the chairman and included as an agenda to inform the Board of Directors' meeting every quarter.

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5.2 Director's Code of Conduct towards the Shareholders

Guidelines

1. Determine to disclose information accurately, completely, adequately, and timely for equal access to information and be careful not to mislead the shareholders or confused in the information.
2. Maintain the rights of shareholders and treat all shareholders equally regardless of gender, age, race, nationality, religion, belief or political opinion. Even if the shareholders are unable to attend the meeting due to any inconvenience, the shareholders have the right to appoint another person to attend the meeting on their behalf.
3. Not seeking benefits for oneself and those involved using any inside information that have not yet been disclosed to the public.

5.3 Director's Code of Conduct towards the Employees

Guidelines

1. Determine the welfare, compensation and welfare policies that are fair to employees.
2. Treat employees with politeness. Avoid any unfair action and listen to the opinions and suggestions of employees.
3. Promote knowledge development and the ability of employees on a regular basis.
4. Follow up for the Company to act on the Code of Conduct and the roles that employees can perform to create behavior that is within the framework of the Code of Conduct throughout the organization.

5.4 Director's Code of Conduct towards the Customers

Guideline

1. Support and encourage the Company to innovate in order to achieve the highest customer satisfaction.
2. Supervise the Company to organize the system for customers to complain about the service and giving customers a quick response.

Category 6 : Code of Conduct of the Executives

Regarding the requirements for the executives, Muangthai Capital Public Company Limited expects executives to demonstrate the Company's intention to conduct business with transparency and morality. The duties are performed according to the highest ethical standards with honesty, caution and prudence for the benefit of shareholders and stakeholders. Therefore, the code of ethics is defined to be used as a practical guideline for executives as follows:



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6.1 Executive's Code of Conduct towards the Company

Guidelines

1. Perform duties with honesty and does not take any action in a manner that causes a conflict of interest to the Company.
2. Perform management duties to the best of their ability with care under the rules of good Corporate Governance.
3. Provide a control system and effective internal audit to ensure that the Company has complied with various standards and laws related under the scrutiny of the internal auditors and review of the Audit Committee.
4. Company's Management is responsible for preparing financial reports that are accurate, complete and timely. Both quarterly and annual statements are prepared according to accepted accounting standards.

6.2 Executive's Code of Conduct towards the Shareholders

Guidelines

1. Prepare a report on the status and performance of the Company and other important information to shareholders equally, consistently, and completely according to reality.
2. The Company emphasizes that executives perform their duties with honesty and straightforwardness within the framework of the Company's rules and regulations by upholding this Code of Conduct to act in all activities, decisions and transactions and shall conduct the business with honesty and take any action with fairness to all shareholders.

6.3 Executive's Code of Conduct towards the Employees

Guidelines

1. Provide appropriate compensation according to the knowledge and abilities of each employee. It can be compared with the Company operating the same business as well as taking care of the working environment by considering the quality of life and safety at work. In addition, there is proper care, assistance and welfare for employees.
2. There is a clear policy and guidelines on compensation, career growth, and welfares that all employees receive. There is an announcement posted on the Company's internal website under the topic of the personnel department which employees can read and study.
3. There is the development of the Company's personnel every position and every level continuously. The emphasis is placed on organizing training and seminars on an annual basis by inviting speakers with knowledge and reputation to train. The employees can learn and continuously develop the potential and skills of employees to increase the

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knowledge and skills necessary for career growth as well as preparing the organization to create executives to replace important positions.

4. The appointment and relocation including rewarding and punishing employees must act in good faith and based on knowledge the ability of that employee.
5. There is a system for assessing merit and fairness by disclosing the assessment criteria to employees at all levels for acknowledgment and encourage employees at each level to progress and be able to continually grow in the organization.
6. Emphasize on employees' understanding of the Code of Conduct and roles which employees can do to encourage behavior within the framework of the Code of Conduct throughout the organization.
7. The supervisor should behave in a way that is respected by employees and employees should not do anything which is disrespectful to the supervisor.
8. Refrain from giving gifts to subordinates or receive gifts from subordinates.

6.4 Executive's Code of Conduct towards Customers

Guidelines

1. Present loan approval conditions and/or benefits that customers will receive transparently and clearly in order to benefit the customers as much as possible.
2. In the event that customers face financial crises caused by natural disasters that affect the public, the Company will have measures to provide an assistance to customers as appropriate.
3. Provide an opportunity for customers to complain about the service of employees directly to the complaints department of the head office by calling 02-4838888 or 1455 making a complaint through a letter in the form of a questionnaire sent by the Head Office to the customer.

6.5 Executive's Code of Conduct towards Competitors

Guidelines

1. Treat competitors fairly without action that is an attack slander or damage the reputation of competitors including affixing publicity labels. It will be operated under good competition. There is no label to destroy competitors including no infringement of intellectual property or copyright of others.
2. For the Company's business operation, it must be managed in order for the business to grow sustainably and stably under careful operation honesty and being fair to those involved.
3. Not seek competitors' confidential information through dishonest or inappropriate means such as paying employees of competitors.

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Category 7 : Code of Conduct of the Employees

The employee's Code of Conduct has been prepared in this manual as a basic standard for employees in conducting oneself in an ethical manner according to the principles of good Corporate Governance, therefore defining the code of ethics to be used as a guideline for employees as follows:

7.1 Employee's Code of Conduct towards the Company

Guidelines

1. Avoid any action which is contrary to the interests of the Company whether due to contact with the Company's trade related parties such as customers, competitors or the use of opportunities or information obtained from being a director or employees in private exploitation or working other than the work of the Company which will affect the work on the job.
2. Take full responsibility for their duties, knowledge and abilities taking into account the maximum benefit of the Company. Do not take the opportunity or use the job position to seek benefits for oneself.
3. Have good attitude maintain reputation and corporate image by maintaining the good reputation of the Company not to be malicious or to provide information that will cause disgrace to the Company and understanding with outsiders to maintain a good image of the organization.
4. Perform duties with honesty and forthrightness, not asking/accepting or agreeing to receive money, things, or any other benefits from people related to the Company's business especially procurement. It must be operated under transparency being able to check and compare prices from the same businesses that were tendered.
5. All employees must contribute and maintain a good working atmosphere to build solidarity among employees, avoid any action which will affect the reputation and image of the Company or causing problem for the Company later.
6. The employees must be taken seriously and strictly commit to all activities that will enhance the quality, efficiency and development of the organization towards excellence.
7. The employees are prohibited from accepting any traditional gifts, except for receiving them on behalf of the Company and collectively.
8. It is forbidden for the employees to claim or accept things or any other benefits for themselves or others who are in the way of motivation to act or refraining from performing duties in a wrong way such as procurement, etc.
9. The employees have duties and responsibilities to take care of the Company's assets not to be damaged, lost, and to use assets effectively for the full benefit of the Company and not to use the Company's assets for the benefit of oneself or others. Such property means



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any tangible and intangible property as well as confidential information that is not disclosed to the public such as business plan, financial projection, human resources information and debtor information.

7.2 Employee's Code of Conduct towards the Management

Guidelines

1. Respect, polite, humble, respect for supervisors to comply with lawful orders.
2. Not make false reports or offer dishonest opinions to supervisors as well as not defaming the management without the facts.
3. Refrain from giving gifts to supervisors or receive gifts from subordinates

7.3 Employee's Code of Conduct towards Colleagues

Guidelines

1. Provide knowledge and transfer work experience to participants or to give advice to colleagues for good organization development.
2. Maintain and strengthen unity including participating in various activities organized by the Company to build good relationships between colleagues.
3. Treat colleagues with politeness and respect for each other.
4. Not use the work of fellow employees to pretend to be their own work.

7.4 Employee's Code of Conduct towards Oneself

Guidelines

1. Have good attitude to take pride in being an employee and maintain their reputation and the honor of their employees.
2. Be punctual and devote time to work fully.
3. Develop oneself to be able to work effectively and always effective.
4. Refrain from all evil not behaving in a way that could defame your reputation and the dignity of oneself and the Company.
5. Study and acquire knowledge and experience to enhance oneself to be competent in professional work by always working efficiently and effectively along with maintaining good moral character being both good person of the organization.

7.5 Employee's Code of Conduct towards Customers

Guidelines

1. The success of the Company is based on customer satisfaction. All employees must create good relationship with customers by adhering to the principles of honesty, ethical treatment and realize that each customer has different needs and expectations. The employees must meet the needs of various customers including giving advice to

INTIMATE SERVICES LIKE CLOSED FAMILY MEMBERS



MUANGTHAI CAPITAL PUBLIC COMPANY LIMITED

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

customers about the timing, conditions for arranging contracts for customers by clearly presenting the information in the contract arrangement truthful, transparent, and fair.

2. The performance of contracts, agreements or conditions towards customers. In the event that it will not be possible to conform to, the employees must negotiate with customers in advance to jointly find solutions and prevent damage.
3. Respond to customers' needs with speed willing to serve under the slogan that "Intimate Service Like Close Family Members".
4. In case of following up on overdue customer. Employees will follow up under the conditions. Debt collection act strictly.
5. The employees must not claim, accept or not give any benefits dishonest with customers.

7.6 Employee's Code of Conduct towards Competitors

Guidelines

1. The employees must behave within the framework of good competition rules without damaging the reputation of competitors by accusing them of harming the competitors including affixing publicity labels. It will be operated under good competition and there is no label to destroy competitors.
2. The employees must not seek competitors' confidential information through dishonest or improper means such as paying competitors' employees.

Category 8 : Compliance Monitoring

The Corporate Governance and Sustainability Committee has a duty to monitor and encourage the process of the Company for complying with the business Code of Conduct policy and guidelines. The Company has set duties and responsibilities for directors, executives and all employees to acknowledge and strictly comply with the policy. The Company has organized a compliance monitoring in all cases that occur in every dimension.

Hence, it is important that executives are responsible for encouraging employees under their command to have knowledge and understanding and follow the Code of Conduct guidelines. The Company shall not take any action against the laws or violate the good Corporate Governance principles. If the directors, executives or employees commit an offense, they will be disciplinary punished. Moreover, if there is any action against the laws and the Company's Code of Conduct, whistleblowers can send complaints to the Audit Committee through the whistleblowing channels and the complaints will be managed by the Audit Committee respectively.