

SCGJWD Code of Conduct

Message from the Chairman

SCGJWD Logistics Public Company Limited (the “Company” or “SCGJWD”) has a policy to promote ethical integrity and transparency, focusing on conducting business in accordance with ethical principles in all aspects and in line with the principles of good corporate governance, aiming to become a responsible organization. Therefore, the Company has established the **"SCGJWD Code of Conduct"** as a guide for the Board of Directors, executives, and employees at all levels to ensure that all personnel of SCGJWD understand the principles and practices and exercise discretion in working according to the ethical guidelines of SCGJWD throughout the organization to create stability, continuous growth, and sustainability for the organization, and for the maximum benefit of all stakeholders fairly and equitably.

Mr.Nithi Patarachoke

Chairman of the Board of Directors

SCGJWD Logistics Public Company Limited

1 January 2024

Content

| Topic | Page |
|---|-------------|
| Content | 3 |
| Definition | 5 |
| The ethical guideline of SCGJWD | 7 |
| Section 1 | |
| 1. Human Rights | 7 |
| 2. Safety, Health and Environment | 15 |
| 2.1 Environment and Efficient Resource Usage | 15 |
| 2.2 Safety, Health and Environment at Work | 17 |
| 2.3 Safety of the Service Provision | 19 |
| Section 2 | |
| 3. Anti-Corruption | 21 |
| 4. Gift-Giving and Receiving | 23 |
| 5. Conflict of Interest | 25 |
| Section 3 | |
| 6. Treating of The Company's Data and Assets | 27 |
| 6.1 Personal Data | 27 |
| 6.2 Recording, Reporting and Data Storage | 32 |
| 6.3 Securities Trading and Internal Organization Usage | 33 |
| 6.4 Usage and Asset Storage of the Company | 35 |
| 6.5 Usage and Information Technology Storage | 36 |
| 6.6 Usage and Storage of Intellectual Property | 38 |
| 7. Data Disclosure and Communication | 40 |
| 7.1 Data Disclosure | 40 |
| 7.2 Communication | 41 |
| 8. SCGJWD Transactions | 43 |
| 8.1 Transaction among SCGJWD subsidiaries | 43 |
| 8.2 SCGJWD Transactions with External Parties | 44 |
| 9. Business Competition, Anti-Unfair Competition and Prevention of Monopoly in Business | 46 |
| 10. Anti-Money Laundering | 47 |

Introduction

What is SCGJWD Code of Conduct?

SCGJWD Code of Conduct means the business conducting's quality guiding principles for SCGJWD employees to collectively adhere to particular practices, and be regarded appropriate operation guidelines as part of employees' regulations.

Who are obliged to comply with SCGJWD?

Every SCG JWD employee is responsible to comply with identified principles and guidelines in SCGJWD Code of Conduct, with members of the Board of Directors as fine examples.

According to SCGJWD, what are actions you are expected to take?

1. **Understanding** principles and guidelines identified in SCGJWD Code of Conduct, particularly in topics related to your roles and responsibilities.
2. **Consulting** SCGJWD supervisors when you are uncertain whether actions to be taken are correct according to SCGJWD Code of Conduct.
3. **Communicating** with people you are working with and involved parties SCGJWD employees' guidelines, according to SCGJWD Code of Conduct.
4. **Informing evidences** of non-compliance actions according to SCGJWD Code of Conduct via specified channels and be cooperative during investigation processes.

What will happen should you not comply with SCGJWD Code of Conduct?

- By not complying with identified principles and guidelines stated in SCGJWD Code of Conduct, you possibly violate the Company's disciplines and, as a consequence, may be considered for punishment according to specified criteria.

- Aside from not complying with the aforementioned SCGJWD Code of Conduct; support of other employees' violation, negligence of violation evidences when being discovered as well as obstruction of investigation processes and unfair practices to those providing facts are considered actions not following SCGJWD code of conduct either.

How should you act when discovering actions violating the Code of Conduct?

SCGJWD employs Whistleblowing System according to international principles. In case you learn, spot actions, or are subjects regarding the corruption as well as violation of laws, SCGJWD rules, regulations and code of conduct; you may send notifications regarding those actions by yourselves by:

1) Informing the complaint recipient via

- Registered mail

To Independent Directors

SCGJWD Logistics Public Company Limited

36 Krunghthep Kreetha Road, Hua Mak, Bang Kapi District, Bangkok 10240

- Email, Telephone and Website

The Board of Director (via independent directors independent_director@scgjwd.com)

The Company's Secretary nattapume.p@scgjwd.com 02-7104000 (2010)

Investor Relations chadatirud.l@scgjwd.com 02-7104000 (2296)

Website <https://www.scgjwd.com/th/contact-us>

How will people making complaints/ people giving information be protected?

People making complaints or people in cooperation with the verification will be protected according to the following criteria:

- 1) People making complaints or people who are cooperative in the verification process are capable to choose whether they would like their identities to be revealed, should they perceive that the disclosure may cause insecurity or damage.
- 2) In case people making complaints disclose ones' identities, the Company will report progresses and inform facts accordingly.
- 3) The Company will not reveal names-surnames, addresses, pictures or any other information that may identify people making complaints or people who are cooperative in the verification.
- 4) The complaint recipient and those involved must keep related information confidential, and will reveal only those essential – in relation to the security and damage of people making complaints or people who are cooperative in the verification of proofs, sources or related individuals. Should the disclosure tend to cause any damage or insecurity, appropriate protection measure will be imposed.
- 5) People suffering from those actions will receive supports with proper and fair processes.

For further details, please read “Whistleblowing Policy and Guideline as well as “Whistleblower Protection Measure” stated in Good Governance Policy.

Definition

SCGJWD means

1. SCGJWD Logistics Public Company Limited
 2. Subsidiaries of SCGJWD Logistics Public Company Limited
- **Subsidiary** means a subsidiary according to the consolidated financial statement of SCGJWD Logistics Public Company Limited.

- **The Company's Board of Directors** means the Board of Directors of SCGJWD Logistics Public Company Limited.
- **SCGJWD Employees** mean full-time employees of SCGJWD under employment contracts, probationary employees and employees with special contracts of SCGJWD subsidiaries in every country where SCGJWD operates its businesses.
- **Stakeholder/ Stakeholders** means individual or groups of people who is/are directly or indirectly affected as a result of SCGJWD business operation or is/are in relation to SCGJWD business operation or play a role/roles that may have influence on SCGJWD business operation e.g. the Board of Directors, employees, shareholders, business partners, contract parties, people related to the business, creditors, debtors, society, communities around factories etc.
- **Business Partners or Vendors** means contractors or service providers of SCGJWD or contract parties having hire of work agreement with SCGJWD.
- **Contract Party/Parties** means a party/parties that is/are obliged to bind oneself/oneselves and has/have rights, duties and responsibilities as mentioned in a contract/contracts made with SCGJWD.
- **People Related to the Business** means any individuals or juristic persons whom SCGJWD has business relations with -- such as the government, state agencies, state enterprises and private organizations.
- **Customer/ Customers** means a person/people who receives/receive services, purchases/purchase products and uses/use products.
- **Transaction** means an activity/activities relating to legal acts, contracts or any action with other people regarding finance, business or any operation involving assets e.g. management, purchasing, selling, hiring, providing financial assistance, technical or personal support etc.

Guideline according to SCGJWD Code of Conduct

Section 1

1. Human Rights

Principle

SCGJWD Logistics Public Company Limited adheres to ethical business practices as well as social and stakeholder responsibility in accordance with the Company's Good Governance and Ethics. In terms of human rights protection, the Company strictly complies with laws and international principles -- particularly in supporting and following Universal Declaration of Human Rights: UDHR, United Nations Global Compact: UNGC, United Nations Guiding Principles on Business and Human Rights: UNGP and The International Labor Organization Declaration on Fundamental Principles and Rights at Work: ILO. To certify that the Company's business operation is exempt from human rights violation, the policy and guideline regarding human rights are determined to prevent the violation among the Company's direct activities – including its business partners in business value chain and joint ventures.

Definition

Human Rights means rights inherent to all human beings, regardless of physicality, mind, race, nationality, ethnicity, religion, sex, language, age, skin color, education, social status, culture, tradition or any other topics in accordance with respective countries and treaties that each country has an obligation to comply with human rights -- including rights to live one's life and freedom from slavery and torture, freedom of opinion and collectivity; rights to work, education and others. Every human being has these rights equally, without discrimination.

The Company means SCGJWD Logistics Public Company Limited and its subsidiaries according to consolidated financial statements. The Board of Directors, executives and employees at every level must realize the importance and the respect to human rights in every dimension of every individual as well as societies and communities in relation to each country's laws and treaties that a country has an obligation to – including:

- Equal treatment to every human being, without discrimination -- according to human rights principle
- Avoidance of actions that may violate human rights
- Promotion of human rights
- Communication by disseminating, sharing knowledge and understanding, determining policy, monitoring and providing other supports to business partners in business value chain, suppliers, contractors and joint ventures to participate in ethical business operation, with respect to human rights as well as treating every human being in accordance with this policy of human rights.

Guideline

1.1 Guideline Regarding Human Rights

- 1) Paying respect to human rights, treating others with consideration and honor as well as dealing with one another equally, without discrimination in terms of physicality, mind, race, nationality, origin country, ethnicity, religion, sex, language, age, skin color, education, social status, culture, tradition or any other topics -- by treating the Company's employees and stakeholders such as customers and business partners equally, with no discrimination.
- 2) Taking cautions when performing duties to prevent any risk that may violate human rights during business operation as well as monitoring the respect to human rights.

- 3) Promoting the operation to protect human rights
- 4) Communicating with business partners in business value chain, suppliers, contractors and joint ventures by disseminating, sharing knowledge and understanding, determining policy and providing other supports -- so that they will participate in ethical business operation, with respect to human rights as well as treating every human being in accordance with this policy of human rights.
- 5) Monitoring the respect to human rights, without negligence when discovering actions that may violate human rights relating to the Company; reporting to supervisors or responsible persons and being cooperative in verification processes are expected. Should one have any questions, one should consult respective supervisors or responsible persons via specified channels.
- 6) The Company will uphold fair practices and protect persons informing the human rights violation relating to the Company by implementing protection measures for informant and those who cooperate in reporting human rights cases, as identified in Whistleblowing Protection Policy and Guideline.
- 7) The Company will develop and execute human rights due diligence process continuously to identify issues as well as assessing risks and effects from human rights violation. Furthermore, the Company will determine groups or individuals affected; plan and conduct rectification and prevention guidelines -- by providing appropriate mitigation processes when cases regarding human rights violation are discovered.
- 8) The Company will verify and monitor results from management and rectification regarding human rights violation in accordance with verification and monitoring processes – including the provision of support and cooperation for mitigation resulted from or relating to the Company.

9) The Company is committed to create and maintain corporate culture adhering to the respect to human rights according to this human rights policy.

10) Violators of human rights are violators of the Company's code of conduct, subject to disciplinary punishment as of identified regulations. In addition, violators may be penalized according to laws should those actions are against the laws.

1.2 Treating Labor with Fair Practices in Accordance with Human Rights Principles

1) Guideline Regarding Forced Labor

No action and support of forced labor of any form -- including internal and within the Company's supply chain, no physical punishment as well as threat resulted from being violently treated or any other forms of physical, sex, mind or speech persecution are allowed, as of disciplinary and control standards.

2) Guideline Regarding Child Labor

Hiring and supporting children aged below the age identified by the laws employment -- including internal and within the Company's supply chain, provision and promotion of child labor to work for jobs that are detrimental to their health or under circumstances that may harm their health and safety – are prohibited.

3) Guideline Regarding Female Labor

Female employees are forbidden to work for jobs that are detrimental to their health according to specified laws. The Company will arrange working environment that is not harmful to their health and safe for maternity. In addition, the Company will not terminate the hiring, demotion or reduce benefits of female employees with reasons in relation to their maternity.

4) Guideline Regarding Legal Foreign Workers

The Company operates its businesses with ethics and responsibility, especially in hiring foreign workers legally, both the Company's and its business partners -- in terms of contracts, work permit and safe working environment.

5) Guideline Regarding Discrimination

Action and support of discrimination in labor hiring, payment, compensation, benefit, opportunity to attend training session for development, consideration for promotion, termination and retirement -- as well as any interference and obstruction that may affect employees' rights or behaviors resulted from differences in terms of nationality, religion, language, age, sex, marital status, disabilities, membership of trade union, membership of employee directors, popularity for political parties or other personal opinions -- are prohibited.

6) Guideline Regarding Freedom of Association and Collaboration for Negotiation

The Company respects employees' rights and provide freedom to associate with associations, trade unions, federations, collaboration for negotiation, and will not obstruct the operation of trade unions or labor federations or hinder the rights of its employees to be members of trade unions. The Company provides facilities and will treat particular representatives equal to other employees.

7) Guideline Regarding Labor's Working Environment and Quality of Life

The Company is committed to facilitation of employees' operation with standard, promotion of proper hiring for employees as well as arranging safe working environment, for good quality of life -- so that they are capable to perform well without being affected by physical and mental health. Moreover, the Company pays attention to safety, health and environment at high level by devoting its effort to prevent accidents, wounds and illness symptoms caused by operation under

the protection and fair practices on the basis of society and provision of the laws; and will always review, develop, and adjust these practices.

8) Guideline Regarding Responsibility for Employees in terms of Being Threatened and Sexually Harassed

The Company promotes working environment where one gives honor to others and preventive measures for being threatened and sexually harassed by expressions of speech, gesture, physical touch or any other means are implemented. Should employees be threatened or sexually harassed, the Company will strictly consider executing disciplinary penalties on those violating regulations in relation to Company's operation.

9) Guideline Regarding Compensation

The Company provides compensation, overtime payment and benefits that employees should receive not less than identified rates in accordance with the laws; and arranges that employees perceive information of salary and compensation as a result of their work in each period by vividly informing details for each category.

10) Guideline Regarding Working Hours

The Company prohibits longer working hours than those specified by the laws, including overtime and on holiday operation -- with specification of regular working periods: starting, ending, breaks during the work and lunch time – as well as providing its employees' rights for taking vacations and holidays, according to the laws.

11) Guideline Regarding Termination and Compensation

The Company adheres to Labor Protection Act B.E. 2541 with updates, which determines the duty of employers and the rights of employees in case of termination – as stated by International Labor Organization's pact.

12) **The Company Has No Intention to Terminate Employees' Contracts** without reasonable ground.

Employees will be notified before the termination, and will be given compensation according to the laws.

1.3 Extensive Verification Regarding Human Rights Violation

The company comprehensively monitors and verifies actions concerning human rights violation by inclusively assessing evidences contravening human rights that may occur at each of its working area together with that in its supply chain annually, with following processes:

1) **Announcement of the Company's Respect to Human Rights Policy and Principle**

The announcement of the Company's respect to human rights policy and principle covers all SCGJWD operations in its own business activities and those in its subsidiaries.

2) **Assessment of Actual Impact or Tendencies to Happen**

The Company implements risk assessment regarding human rights violation that may happen; and develops measures to minimize effects that may occur according to human rights violation issues, particularly in high-risk and extremely high-risk ones – to be the guideline to reduce and control negative effects to low or acceptable levels as well as enhancing positive results to those affected.

3) **Integration of Operation**

The Company implements the assessment of risks regarding human rights violation that may happen; and develops measures to minimize effects that may occur according to human rights violation issues, particularly in high-risk and extremely high-risk ones – to be the guideline to reduce and control negative effects to low or acceptable levels as well as enhancing positive results to those affected.

4) Monitoring and Reporting Operating Results

The Company consistently reviews issues with risks, mitigation measures and protection of human rights risks -- by monitoring and evaluating the Company's operation with key performance indications e.g. percent of employees attending human rights training sessions, the number of complaints received and being rectified etc. In addition, the Company reports human rights operating results annually via the Company's annual report and website.

5) Mitigation of Negative Impact

The Company provides channels for complaints in case there are any evidence concerning human rights violation relating to the Company's operation, and consequently determines directions and mitigation measures regarding human rights violation impact for different evidence contexts or for each human rights violation case – by identifying the rectification and mitigation for the loss, both in monetary and non-monetary aspects, to those affected.

Examples

- 1) Should you perceive that the Company's business partner is employing child labor, how should you act?

Guideline Please report to your supervisor immediately, as SCGJWD promotes ethical operation of its business partners. Should any business partner not comply with specified business partners' code of conduct, the Company reserves the right to take actions to particular business partners, with consideration of occurred impacts and losses.

- 2) Should you, as a supervisor, need to conduct annual performance appraisal for your subordinate who has personal conflict with you; how should you act?

Guideline You are expected to apply the same practice to every subordinate, without prejudice; avoid any unreasonable and fair action and conduct performance appraisal for the respective subordinate in relation to his operating results, knowledge and capability – without personal feelings and bias.

- 3) Should you see your fellow colleague who is currently pregnant working overtime, how should you act?

Guideline Please report to your supervisor, as pregnant employees reserve the right for particular protection according to labor laws – which, in general, prohibits female workforces to work overtime or work on holidays, unless matched with the exception according to the laws.

- 4) Should you encounter a situation that your colleague insults others by words or actions that may violate human rights, how should you act?

Guideline Please report to your supervisor to collect facts to consider together with other involved people to determine actions for each case -- as in examining human rights violation evidences, facts in details and laws are essential to be taken into consideration in addition to taking actions in accordance with related laws' procedure and methods.

2. Safety, Health and Environment

2.1 Environment and Efficient Resource Usage

Principle

To create confidence in the efficiency of environment and safety operation as well as promoting the realization of efficient resource usage among executives and employees, the Company strictly conducts its businesses in relation to laws, rules and regulations regarding environment and safety – according to international standard such as ISO and OHSAS. Its operating results as well as

environment and safety measurements are systematically stored, monitored from Safety Department regularly, and submitted to involved government sectors according to particular schedules.

Guideline

- 1) The Company conducts its businesses in accordance with laws, rules and environment policy, with consideration of natural resource and environment impact by reviewing and evaluating environment operating results regularly.
- 2) The Company discloses environment operating results transparently via proper channels, and allows communities and stakeholders to voice their opinions toward projects that may affect communities and societies.
- 3) The Company creates corporate culture and awareness for employees at every level to cooperate and be responsible for environment management, efficient and sustainable resource usage such as campaigns for paper reduction in working processes, 2-page paper usage, on-and-off electricity turning at specific times and water-saving.
- 4) The Company promotes knowledge sharing and training sessions in the topic of environment for employees.
- 5) The Company supports environment management system -- ranging from economical resource usage, treatment and replenishment, replacement, supervision and protection of natural resource and environment sustainably.
- 6) The Company employs the process of environmentally-friendly business partners selection.

Example

- 1) Your subordinate reports that communities around the Company's factory are affected by waste water, smell or dust that may be from activities as part of operation. He would like to inform

involved parties but do not know the channel for complaints and how to communicate properly.

What should you, as the supervisor, act?

Guideline You are expected to coordinate and/or rectify those problems urgently when there are complaints or tendencies to be complained as a result of SCGJWD business operation -- starting from facts verification, information analysis, problem solving, responsible persons and due date identification. Besides, you are requested to communicate with those affected taken problem-solving actions as well as your supervisor to find proper solutions and minimize troubles as soon as possible.

2.2 Safety, Health and Environment at Work

Principle

In adherence with the importance of its employees, business partners and stakeholders' health and safety as well as realization in environment problems; the Company identifies the Safety, Health and Environment Policy as the direction to prevent and control danger as a result of working. Safety, Health and Environment at work is regarded every employee's duty and responsibility to cooperate in maintaining safe working environment always.

Guideline

- 1) The Company conducts its business on the ground of laws regarding Safety, Health and Environment as well as standard, requirement and other related laws in relation to risks of business operation.
- 2) The Company determines key performance indications and targets aligned with main objectives for Safety, Health and Environment as well as efficient and effective strategies and operating plans.

- 3) The Company complies with Safety, Health and Environment System; Road Safety System, Environment Management System and other management standards – including promotion of business partner development to elevate the standard of Safety, Health and Environment Management.
- 4) The Company promotes knowledge strengthening, awareness creation, training, counselling and participation for its employees, business partners and workers representatives -- in addition to appropriate related resources support.
- 5) The Company discloses and is responsible for reporting Safety, Health and Environment information together with reviewing operating results and receiving involved parties' opinions for consistent prevention, protection and improvement leading to sustainable development.

Example

- 1) The company you are working with is constructing a warehouse where business partners are going to do the job on site. You have discovered that respective business partners do not comply with the Company's safety rules. As the employee who is the construction project leader, How should you act?

Guideline You are expected to advise that business partners abide by the Company's safety rules as what employees do – for safety all through working periods, and treat those business partners as the Company's employees. Training sessions with requirements regarding safety are required to be conducted for respective business partners before starting the work.

- 2) You are assigned by your supervisor to repair a building, and then discover that there is no safety equipment. **How should you act?**

Guideline You are expected to halt or decelerate the operation should the assignment be considered harmful or discovered that there is no safety equipment, and that you are uncertain

of safety for the operation – by informing your supervisor to provide appropriate safety equipment for starting to work. Operating at height is regarded a high-risk task that needs preparation for venues and proper safety equipment.

2.3 Safety of the Service Provision

Principle

SCGJWD operates to ascertain that its logistics services employ safety standard aligned with or above identified laws, on a par with related international standard; and follow requirements agreed with its customers – starting from upstream to downstream, including information provision of its related services to the extent that its customers and business partners are safe. The Company is committed to participate and promote safety standard in logistics for stakeholders such as customers, business partners, transportation representatives of government sectors.

Guideline

- 1) The Company provides services in consideration of its employees, business partners and customers' safety. Should there be any changes that may affect service safety, permission from supervisors or responsible persons is mandatory -- with evidence records in details for reference.
- 2) The Company stores the information regarding safety in its responsibility for verification and confirmation.
- 3) The Company expects that employees report to their supervisors immediately when perceiving or being worried about service safety as a result of logistics processes or unsafe situations.
- 4) The Company receives complaints regarding service safety, coordinates or improves the situation in time. Should there be any limitation or that the situation requires longer time for

problem-solving, responsible persons are expected to report the information and status to their supervisors at proper times -- as well as informing the progress of the rectification from time to time.

Example

- 1) You observe that business partners, transportation representatives, transportation vehicle drivers do not comply with the term of service, possibly affecting specified service safety for products and services as well as resulting in the damage of transported products. **How should you act?**

Guideline You are expected to consult your supervisor promptly, as identified processes that the Company determines are to ascertain that products, services and safety standard are in response to customers' needs – helping the company maintain standard, quality and reputation. The Company does not regard delivering advices the accusation of employees, business partners or transportation representatives.

- 2) Should you perform duties of transportation services to deliver products to customers with the terms of service for on-time delivery. You then discover that transportation vehicles are in unsafe condition; and that should you provide a new vehicle for delivery, it may not be delivered in time. **How should you act?**

Guideline You are expected to report the situation to respective customers immediately and arrange a new vehicle. The delivery may be behind schedules; however, products will be delivered safely. Employing unsafe vehicles for delivery may allow opportunities for accidents -- causing damaged vehicles and products leading to the inability to deliver products eventually – aside from creating danger to transporters.

Section 2

3. Anti-Corruption

Principle

Realizing the importance of managing and operating its businesses under Good Governance principles by adhering to business operation with transparency; the Company determines the anti-corruption policy for members of the Board of Directors, executives, employees and staff to avoid any action that may involve any form of corruption either directly or indirectly for benefits of oneself, family members, acquaintances or any persons related to oneself.

Definition

Corruption means actions or the exemption of actions for ones' duties or improper usage of power according to ones' respective positions in every form -- be it provision or receiving bribes related to government officials or any other people operating businesses with the Company or its subsidiaries, domestically and internationally – for acquisition of undeserving benefits to organizations, oneself or other related people; including benefits resulting from illegal actions, usage of the Company's information for other businesses related to ones' own and/or benefits to directly or indirectly obtain cash, assets or other benefits inappropriately for oneself or others – with exception for cases that comply with the laws, rules, announcement, regulations, local cultures or commercial customs.

Guideline

- 1) Any action of corruption is prohibited. You are expected to be cautious in high-risk operating processes e.g. selling, marketing, procurement, investment projects, contract signing, gift-giving and receiving, reception hosting, donation or financial support etc.

- 2) Negligence when discovering actions that may be of corruption related to SCGJWD is prohibited.
You are expected to report to your supervisor or responsible persons and be cooperative during verification processes.
- 3) You are expected to be attentive when conducting transactions with any person, juristic person or organization suspected to be related to corruption.
- 4) You are expected to share knowledge and understanding with people in relation to SCGJWD that are involved with mandatory actions in compliance with anti-corruption policy.
- 5) The action of operating the donation or receiving cash for donation, financial support or assets, the employment of government officials has to be appropriately conducted with transparency, in accordance with the Company's anti-corruption policy and regulations. This is to ascertain that cash received for donation, financial support is not related to any bribery, conflict of interest, payment for facilitation – directly or indirectly.

Examples

- 1) A staff of a project asks for benefits that he will receive should he is capable to convince the project owner to use SCGJWD services. How will you answer this staff?

Guideline Please give an explanation that according to the guideline, SCGJWD will not pay benefits or compensation unless it is in compliance with commercial customs SCGJWD adheres to.

- 2) The company that you are working with is currently waiting for action permissions. You meet a person offering facilitation for permission acquisition, claiming himself as an acquaintance of the staff issuing the permission, should you provide benefits for him. **How should you act?**

Guideline You are expected not to pay any person for special rights related to permission request, as it is not in accordance with specified laws.

- 3) SCGJWD orders products from overseas. You are informed by the seller that it is a custom that compensation must be presented to you as the person conducting the procurement. How should you act?

Guideline You are expected to decline the benefit from the seller. In this case, you are requested to report to your supervisor and negotiate with the seller to return the benefit to SCGJWD.

- 4) A staff of an organization informs you that as his respective organization is currently during the office renovation and would like to request the support of office equipment such as refrigerators, printers for office use. **How should you act?**

Guideline The company you are working with is capable to give support. In doing so, please advise that the organization presents the letter stating objectives and details to the company. The company staff must ask for approval properly and present the support to the organization for public use.

- 5) In case an organization requests bribery from the Company. Should the Company does not settle a payment, its businesses will be affected. **How should you act?**

Guideline You are expected not to present bribes are required to report to your supervisor the impact to the business to minimize the effect. Should your supervisor be uncertain of actions to be taken, you are advised to consult higher supervisors respectively up to the top for consideration.

4. Gift-Giving and Receiving

Principle

As for Gift-Giving and Receiving, reception hosing or other benefits for customers, business partners, business representatives, employees are expected to avoid giving or obtaining any reception proved

to exceed an appropriate amount – except for gifts according to conventionality or usual business reception or expenses for business promotion leading to business reputation, to exchange as of convention. Should the value of those items exceed an appropriate amount, you are advised to inform supervisors of the department's manager immediately.

Guideline

- 1) Before and after giving or receiving gifts and reception hosting for people involved with the business, you are advised to ascertain that those items are of proper value for each occasion, laws, rules, announcement, regulations and local cultures.
- 2) You are expected not to receive or present assets, services or reception that may have an influence or create motivation in a particular decision-making leading to unfair practices.
- 3) You are requested to have proofs for expenditures -- stating the value of assets, services or reception – for further verification.
- 4) In case you are assigned or given permission from your supervisor to assist an external organization's task, it is acceptable that you are presented with assets, services and receptions as usual according to the criteria or standard the organization specifies.
- 5) You are advised to be cautious when presenting assets, services and receptions to your supervisors or persons/internal organizations as well as receiving assets, services and receptions from your subordinates or persons/internal organizations. Those presentations must not create any motivation leading to unfair decision-making.

Example

- 1) A business partner that you are working with invites you to enjoy your relaxing time at his resort by the beach free of charge as well as providing other expenses such as entertainment and traveling. Should you accept this proposal?

Guideline You are advised not to accept this proposal, as it may have an influence on decision-making.

- 2) The Company pays for the fee for you to attend an external activity or seminar, and you receive a prize from the lucky draw for overall participants. Are you capable to keep the prize for yourself?

Guideline You are capable to accept the prize for yourself if the prize is drawn from the lucky draw for many people, with the objective to avoid any decision-making. Should the prize be of high value, you are advised to consult your supervisor for appropriate actions to ascertain that there is no intention to lead any decision-making in relation to the prize receiving.

- 3) The Company assigns that you participate in a golf competition hosted by the Company to strengthen the relationship with its customers. In the competition, you obtain a prize for Individual Category. Are you capable to receive the prize for yourself?

Guideline You are capable to accept the prize for yourself, as that you partake in the competition is regarded part of your assigned jobs. The competition is according to identified rules and regulations that are already announced to participants.

5. Conflict of Interest

Principle

The Company's members of the Board of Directors, executives, employees and staff are required to avoid actions that may cause any conflict of interest with the Company. Any action to be taken must be reasonable -- on the ground of benefits of the Company, in accordance with related laws and regulations. Should there be any action or behavior that may be conflict of the interest with the Company, those persons have duties to report particular cases via specified channels for whistleblowing – in relation to the guideline stated in the Company's Code of Conduct Policy.

Definition

Conflict of Interest means situations or actions that employees receive personal benefits to the level that those benefits play an important part in their decision-making or working in particular positions, and consequently either directly or indirectly lead to SCGJWD benefits.

Guideline

- 1) You are requested not to do the operation for businesses that compete with the Company's, or to be partners and shareholders with decision-making power, to be members of the Board of Directors or executives in organizations competing with the Company or are in the same fields with those of the Company.
- 2) You are requested not to be involved with transactions with parties related to yourselves such as family members, close relatives, close contacts or organizations that you own or are stakeholders – even though it may be beneficial to SCGJWD.
- 3) You are requested not to employ the Company's data or information related to your job positions and responsibilities for your own benefits.
- 4) You are requested to avoid participating in actions of SCGJWD related parties or employees that may lead to any conflict of interest with SCGJWD.
- 5) You are requested to avoid other operations, aside from those of SCGJWD, for your own benefits that may have an influence on your jobs under your responsibility and SCGJWD image.
- 6) Employees are requested not to spend time in searching for information, contacting or trading any securities regularly for their own or other benefits; should those actions not be for SCGJWD benefits.
- 7) In case there are actions that may be conflict of interest with SCGJWD, you are requested to report those particular evidences to your supervisor immediately.

Example

- 1) You are assigned to present products or services to a customer. The customer is your close relative. He then makes a request that you propose lower prices. Are you capable to lower the prices for him?

Guideline You are not capable to do so, whether the condition is beneficial to the Company. In addition, you are requested to explain that you will further discuss with your supervisor regarding this matter, be prepared to coordinate with related parties and will inform updates accordingly.

- 2) A company representative who is also a business partner of SCGJWD invites you to partake in a seminar -- with a proposal to spend travelling, air ticket, accommodation, food expenses in addition to allowances to every participant. Your family members are also welcome to participate in this particular seminar. Should you accept the proposal?

Guideline You are advised not to attend the seminar, as the proposal is the incentive exceeding appropriate level. However, should the seminar be beneficial to the business, you are advised to ask for permission from your supervisor. Should you accept the invitation, you are recommended not to take your family members to the seminar; neither to receive allowances, as the benefit is considered surpassing the level you deserve.

Section 3

6. Treating of The Company's Data and Assets

6.1 Personal Data

Principle

SCGJWD Logistics Public Company Limited and SCGJWD Group (to be called "We") regard and respect personal rights of our service providers, customers, business partners, contracting parties,

shareholders, employees, candidates for job positions and stakeholders who are natural persons -- including natural persons working for shareholders, business partners, service providers and stakeholders who are juristic persons (to be called "You").

We have arranged this personal rights policy to inform our operation to personal data in accordance with personal protection laws such as details of data collection, usage and disclosure (altogether called "Processing") – including data deletion and destruction – to ascertain that your personal data are being protected as follows:

Official Statement

Personal data processing shall be in accordance with related laws and regulations, which could be amended and replaced with newly-issued laws periodically -- to protect personal data in respective countries where we conduct businesses and target as our business locations. We shall collect, store, disclose and transfer only certain data of yours in relation to this personal data protection policy overseas.

Please read the following content for understanding of our viewpoints and actions related to your personal data and means for processing those. As some data of yours are essential for product and service provision; should you disagree to provide those data, you may be incapable to employ or access all functions and usage of our products and services – which, as a consequence, prohibits us from providing products and services for you.

This personal rights policy shall be amended occasionally. We deserve the rights to adjust, rectify, delete and develop this policy at our sole discretion.

Definition

- 1) The Company means SCGJWD Logistics Public Company Limited. SCGJWD Group means SCGJWD Logistics Public Company Limited and its subsidiaries; namely SCG Skills Development Co.Ltd., SCG Nishirei Logistics Co.,Ltd., Thai Connectivity Terminal Co., Ltd., Jumbo Barges and Tugs Co., Ltd. (For further details, please visit www.scgjwd.com).
- 2) Data Subjects mean persons possessing personal data that we collect, employ or disclose – including customers, shareholders, business partners, service providers and stakeholders.
- 3) Data mean personal data and non-personal data, system data, location data as well as cookies.
- 4) Personal Data mean data in relation to persons that allow particular persons to be identified, either directly or indirectly – according to Personal Data Protection Act B.E. 2562 as well as those which shall be amended and other related laws.
- 5) Sensitive personal data mean certain personal data regarding ethnicity, races, political opinions; beliefs in doctrines, religions or philosophies; sexual behaviors, criminal records, health records, disabilities, trade unions, heredities, bio data or any other data affecting personal data subjects in accordance with the committee's announcement.
- 6) Bio Data mean personal data resulted from the application of techniques or technologies in relation to the employment of persons' characteristics or behavior for usage – allowing those certain persons' identities be recognized; such as face recognition, retina recognition and fingerprint recognition data.
- 7) Public Records mean personal data whose respective subjects disclose to public such as online social media credential, after certain data and passcode are employed to log into online social media platforms – including friends of personal data owners. For example, Facebook, Instagram, Twitter, Line and other online platforms to connect or enter any of our certain services. Those personal data subjects are capable to manage privacies via setting provided by particular online social media service providers.

- 8) Data Controllers mean persons performing duties in making decision in relation to personal data collection, usage or disclosure.
- 9) Data Processors mean persons operating personal data collection, usage or disclosure in accordance with instructions or on behalf of Data Controllers.
- 10) Data Processing means any actions related to personal data or sets of personal data -- whether it be autonomically; such as collection, systemization, storage structuring, change or adjustment of receiving, considering, employing, revealing by forwarding, disseminating or any other actions preparing readiness for usage, arrangement or consolidation, limitation, deletion or destruction.
- 11) Application means a program or a set of programs for mobile gadgets and related accessories to function as of instructions, in response to particular users. Application is equipped with User Interface (UI) to be an intermediary for use.
- 12) IP Address means a numerical label assigned to a device such as a computer or a printer connected to a computer network that uses the Internet Protocol for communication.
- 13) Cookies mean small blocks of data that the Company submits to computers or electronic devices connected to the internet for personal data collection. Cookies will be returned to origin websites each time ones revisit particular websites.
- 14) Anonymous Data mean data that cannot identify data subjects, originated from natural characteristics or from data anonymization.

Guideline

- 1) You are advised to respect other people's personal data. Should you use, reveal or transfer other people's personal data; you are requested to receive permission from those particular people, in consideration of the fact that no action violates other people's legal rights.
- 2) Employees responsible for storing data the Company processes or under the Company's supervision are requested to protect employees and related people regarding business operation

their personal data. As a consequence; usage, disclosure or transferring personal data and related people can be conducted as essential according to functions at normal situations -- in consideration of the fact that no action violates other people's legal rights.

Example

- 1) Should you be the person collecting the Board of Directors, executives or employees' biographies; and are requested by an employee to submit those to be disclosed in a particular book or in popular media. **How should you act?**

Guideline You are requested to ask for permission from data subjects before taking any actions, as disclosure of other persons' personal data requires particular data subjects' consent directly. Those who reveal other persons' personal data without permission must take responsibilities in any damage that may occur.

- 2) A former employee of a company that you have known gave you a telephone call – asking for the name, address, telephone number of employees in your respective department by informing that he will use the information to contact those people for proposing financial benefits such as loan service and credit card. Can you give the former employee the information?

Guideline You are prohibited to provide the information to the former employee; as even though names, addresses and telephone number are known in general among colleagues, it is considered personal data that require consent from data subjects before being disclosed.

- 3) How should employees treat others in social media?

Guideline Employees are advised to respect the rights of personal data protection. Usage, disclosure or transfer of other persons' personal data could be conducted after consent have been granted by particular data subjects, in consideration of the fact that no action violates other people's legal rights.

6.2 Recording, Reporting and Data Storage

Principle

SCGJWD realizes the importance of internal organization's management. Documentation and information reporting must be according to specified SCGJWD criteria, correct and complete in accordance with the laws. Data must be stored in a secure condition and prepared for reference or for SCGJWD usage when required.

Guideline

- 1) You are requested to documenting data correctly, completely and in time – by complying with specified SCGJWD criteria or as stated in the laws such as tax law, Thai Financial Reporting Standard and related laws for the Company's business operation.
- 2) You are requested to report data correctly according to facts. In addition, data reporting must be transparent and verifiable.
- 3) You are requested to supervise crucial documents and confidential data by specified methods for each level, each type or category of data. Data must be securely and appropriately stored, including the Company's internal data and involved business parties' such as customers, trading partners and business partners.

Example

- 1) Should you be a Speaker for SCGJWD at a session of a visit by university students, those students ask for electronic data for their report. How should you act?

Guideline You are advised to consult or ask for approval from your supervisors and data subjects before usage or dissemination, with consideration that there is no damage to SCGJWD.

6.3 Securities Trading and Internal Organization Usage

Principle

In conducting the Company's business; there are cases that members of the Board of Directors, executives, employees and related persons are requested to take a variety of confidential information that may affect security prices into consideration. Meanwhile, it is requested that the information be concealed from shareholders, investors or general public. As a consequence, usage of internal information of the Company is crucial for proper management to prevent any information leakage, possibly leading to inappropriate use and taking advantage of others. This is considered illegal in addition to affecting the Company's reputation. As a consequence, members of the Board of Directors identify guidelines for appropriate use the Company's internal information for members of the Board of Directors, executives and employees to act and communicate in a proper manner.

In the following guideline, "Internal Information" means the knowledge that is not yet revealed to the public, as its crucial content may affect security price or value.

Guideline

- 1) Members of the Board of Directors, executives and employees of the Company as well as external working people who perceive or possess the Company's internal information are requested to act as follows:
 - 1.1 Storing the Company's internal information carefully and in a secure manner to prevent the leakage to external organization
 - 1.2 Concealing the Company's internal information to people unrelated to the operation to prevent inappropriate use of internal information, whether it be for one's own or other people's benefits -- as this may affect the Company's or other registered companies' security price or value in

relation to particular internal information, or has an influence on decision-making on investment.

- 2) Members of the Board of Directors, executives, employees of the Company as well as external working people who perceive or possess the Company's internal information are requested not to purchase or sell any securities related to internal information which is considered taking advantage of others.
- 3) Members of the Board of Directors, executives, employees of the Company as well as other involved people are requested to comply with the Blackout Period stated in Good Governance Policy -- to prevent any risk from inappropriate use of internal information.
- 4) Members of the Board of Directors, executives as well as people with positions of the Company's accounting or finance executives at division managers or equivalent are requested to operate, reveal and submit reports regarding security holding of ones' own, spouses or partners together with children not of legal age and juristic persons in accordance with the provision of The Securities and Exchange Act, the announcement of Thailand's The Securities and Exchange Commission and the announcement of related Thai Capital Market Supervisory Board to the Company's Secretary as stated in the Company's Good Governance.
- 5) Members of the Board of Directors, executives and employees have duties to strictly comply with the Company's Licenses, Code of Conduct and Good Governance Policy as well as the guideline for using internal information of The Securities and Exchange Act B.E. 2535 (Amended), ("The Securities and Exchange Act") and Public Limited Companies Act, B.E. 2535 (Amended) and other related rules.
- 6) Members of the Board of Directors, executives and employees not complying with this guideline are considered disciplinary violation; and may be subject to legal punishment should those particular actions are against the laws.

Example

- 1) Rumor has it that SCGJWD will invest in a mega project which, should it be successful, will substantially be beneficial to its business operation. The rumor results in a rising of the Company's stock price. SCGJWD has a plan to invest in that project and is going to reveal it to the public soon. Should you be involved with the preparation for disclosure, are you capable to trade the Company's stocks?

Guideline You are requested not to purchase nor sell the Company's and its related parties' during specified periods, as it is considered actions of using internal information that violate SCGJWD rules and are illegal with criminal penalties.

6.4 Usage and Asset Storage of the Company

Principle

SCGJWD optimizes the use of assets with efficiency – promoting its employees to protect the Company's assets, preventing them not to of damage, loss or be employed for personal use or for other people.

Definition

SCGJWD Asset means any asset the Company possesses or is responsible for ownership and maintenance.

Guideline

- 1) You are advised to employ SCGJWD assets with efficiency and for SCGJWD's benefits.
- 2) You are advised not to misapply SCGJWD assets for other purposes or conduct illegality.
- 3) You are advised to supervise and prevent SCGJWD assets from damage and loss.

Example

- 1) Should you advance the cash of the Company for the use of its operation, how should you act?

Guideline You are requested to employ advanced cash payment for the Company's use only – not employing it for personal or other people's use – and in accordance with the Company's rules for requesting and returning cash advances. Supervisors have duties to strictly supervise

- 2) Should your respective department possess inoperable or deteriorated assets stored in a building, how should you act?

Guideline You are requested to supervise the maintenance and optimize benefits – not employing them for your personal or other people's use – as those inoperable or deteriorated assets are still in possession of the Company.

6.5 Usage and Information Technology Storage

Principle

SCGJWD and its subsidiaries' security for Information Technology System is conducted for determining the guideline as a framework and a strategic navigation map to elevate their information technology security standard at an international level – in addition to minimizing effects as well as restoring the system speedily after being attacked – as the instruction for the Company's information technology users.

Definition

Information Technology System means a department's working structure employing information technology, computer and networking methods to assist in creating information for planning, managing, service providing, developing and controlling communications – including computer equipment, networking system, program, working system and information technology

Working System means the application of information technology to the process to make the work successful according to the objective such as documentation system, vehicle reservations system and goods management system.

Data means text, instruction, a/sets of instructions or any other items in computer system in the state that the computer creates, submits, receives, stores or processes by electronic methods on computer equipment – including electronic data according to Electronic Transaction Law.

Guideline

- 1) You are requested to employ information technology system as well as data in the system for benefits of SCGJWD; and avoid utilizing any application that may violate other users' regular usage, or is irrelevant to the work, or may affect the efficiency of the information technology system.
- 2) It is prohibited that you employ information technology system to access or submit information against moral principles regarding gambling, actions affecting the national security or violating other people's rights.
- 3) You are requested to employ information technology system in relation to the right you are granted permission, store it and allow no one to use your password to access the information technology system.
- 4) You are requested to avoid opening files from unidentified sources as well as employing recording equipment in relation to computers suspected to contain computer virus or other malwares.
- 5) You are requested to avoid installing computer programs together with changing the setting of the information technology that may affect securities by yourselves. Should you encounter any problem or dysfunction, please contact the Company's IT people.

Example

- 1) Should there be an external person requesting for using your respective computer to improve SCGJWD information technology system or website to be response to other structures' applications that are not granted permission as usual, will you allow the person to operate your computer to access internal working systems?

Guideline You are requested not to allow external people to access SCGJWD computers, accounts or internal networks. You may consult your supervisor regarding permission granting for external people in an appropriate manner.

6.6 Usage and Storage of Intellectual Property

Principle

The Company respects other people's Intellectual Property and will employ it only when being granted the right to use it. Employees have duties to protect SCGJWD Intellectual Property from being disseminated without permission.

Definition

Intellectual Property means a work that is the result of human being's invention or creativity.

Patent means a government authority or licenses conferring a right or title for protection of invention or product design; namely, patent for invention, patent for product design and petty patent.

Copyright means literature, drama, fine arts, music, audio-visual materials, cinema, audio recording, audio and visual broadcast such as computer programs, portraits, photographs and articles.

Trade Secrets mean trading data that are undisclosed to general public and possess commercial value, as particular data is confidential and operated in an appropriate manner to maintain their secrecy.

Guideline

- 1) The Company is requested not to violate other people's intellectual property – by examining work related to external persons rights received or to be applied with SCGJWD operation.
- 2) In signing contracts or conducting any legal act, you are advised to make an agreement regarding the intellectual property right. Should you have any queries, please consult SCGJWD Legal Department.
- 3) All employees have duties to protect and maintain secrecies regarding the Company's intellectual property to prevent those data from leakage; and not to utilize a variety of the Company's intellectual properties for personal or other people's benefits without being granted permission.
- 4) The Company promotes its employees to acquire knowledge and understanding of legal requirement and damage as a result of intellectual property violation.

Example

- 1) Should you like to use programs that are currently not installed in the Company's computer, are you capable to download and install them in your respective computer?

Guideline You are requested not to install computer programs by oneself -- as it violates copyright leading to suing for damage. Should you like to use other computer programs, you are advised to consult the Company's Information Technology (IT) representatives.

- 2) During an academic conference, a number of people visit SCGJWD exhibition and ask questions regarding business operation processes, including technology. How should you act?

Guideline You are advised to be cautious when providing information. Before disclosure, you should prepare only the information that is appropriate for unveiling – as the information may be body of knowledge, trade secrets and data in patent.

7. Data Disclosure and Communication

7.1 Data Disclosure

Principle

The Company applies the policy of data disclosure, transparency, financial report and business operation by consistently and timely implementing guidelines in relation to correct, complete, adequate and trustworthy revelation of financial information, business-related topics and business operating results -- for shareholders, investors, securities analysts, people in general and the Company's members of the Board of Directors – to strictly supervise the compliance of laws, rules and regulations concerning data disclosure and transparency.

Guideline

- 1) Any data disclosure that may affect SCGJWD must be conducted by direct people in authority of particular topics, except that ones are assigned by those respective people in authority themselves.
- 2) As for important data that are not yet revealed to the public, people in authority for data disclosure must announce them cautiously, correctly and timely – as well as ascertaining that different groups of stakeholders equally obtain adequate information.
- 3) Any disclosure of other data must be based on reality and without intention to lead others to misinterpret facts.

Example

- 1) A mass media representative gives you a telephone call, requesting the information concerning the rumor of the Company's operating results. Are you capable to explain the fact?

Guideline Only people in authority are capable of answering questions or providing important information, except that ones are assigned to conduct particular sessions in respective topics. Should you be uncertain, please contact the department responsible for those specific data disclosure.

- 2) Should your friends work with the Company's competitors in the same business, are you capable to exchange marketing information such as the Company's product or service growth rate?

Guideline You are expected not to exchange the information, except for the data that are already revealed to the public.

7.2 Communication

Principle

SCGJWD Communications -- including internal and external SCG brands , SCG brands' marketing communications of products and services as well as communications via online social media – must be appropriately conducted -- correct according to facts, with fair practices to every party of stakeholders and creating no detrimental effect to SCGJWD.

Guideline

- 1) SCGJWD Communications is conveyed through social responsibility, environment and values of respective countries where SCGJWD operates its businesses.
- 2) Direct competitive marketing communications with SCGJWD competitors' products or services is prohibited.

- 3) Any content that may create conflicts in society -- such as the 3 institutions: nation, religion and monarchy; politics, beliefs, international relations, sexual orientation or topics as opposed to morality, culture, inequality, discrimination and human rights violation – are forbidden.
- 4) Any communications with exaggeration with intention to lead consumers to misinterpret product quality is prohibited, except when particular communications executed with techniques consumers realize that it is not reality but the creation of interest for its advertising and public relations. That specific content is not reality must be explicitly stated.
- 5) Corporate Identity must be conveyed correctly, in accordance with Corporate Identity Manual: CI Manual. Corporate Identity permission must be granted permission before application. Corporate Identity application for personal use is prohibited.
- 6) Negligence of suspected cases is unacceptable. You are requested to assist the Company -- when detecting any communications with mentions of the organization or actions that may affect its reputation as well as inappropriate use of corporate identity that may result in any damage of the brand -- by informing responsible departments or your supervisor immediately.
- 7) In disseminating any information or voicing personal opinions towards topics via online social media, you are requested to explicitly state that it is your personal opinion – with caution as an employee of SCGJWD.

Example

- 1) You are assigned to produce the organization's media to reflect the leadership in business operation in ASEAN Region. You plan and implement communication pieces by employing different countries' maps and flags. After those pieces of communications are released to target groups, the organization receives complaints that those particular contents and images in respective communication pieces are incorrect. How should you act?

Guideline You are requested to verify respective countries' data, maps, flags or any other symbols and execute only those that are correct. In addition, you are advised to double-check those with responsible government departments. Should you be uncertain if those are correct, you are suggested not to apply those data or images in media production. In case of receiving complaints that those data and images are inaccurate, you are advised to coordinate with people making complaints for explanation and understanding, withdraw those immediately, and rectify those specific communication pieces afterward.

8. SCGJWD Transactions

8.1 Transaction among SCGJWD subsidiaries

Principle

You are requested to consider laws and regulations issued by government departments, including rules and SCGJWD power of attorney as well as criteria and conditions specified in different locations when conducting businesses or taking actions that are transactions among SCGJWD subsidiaries.

Guideline

- 1) You are requested to study criteria, regulations and procedures according to SCGJWD power of attorney carefully before operation.
- 2) You are advised not to act should there be request to skip or neglect any process that is required to be conducted in general.
- 3) You are requested to implement actions in accordance with guidelines and procedures in request for approval in conducting transactions among SCGJWD subsidiaries – whether it be transactions that are related or may have conflict of interest – to optimize benefits for SCGJWD according to specified laws.

- 4) You are expected to conduct transactions among SCGJWD subsidiaries with fair practices and reasons, with no benefit transfer among the Company's subsidiaries.

Example

The Company A would like to purchase a car wreck that is inoperable to improve its condition from the Company B. The Company B does not charge any expense from the Company A, as it views that the Company A is also a subsidiary of SCGJWD. Are the 2 companies capable of conducting this transaction?

Guideline The 2 companies are incapable of trading this car wreck; as it is requested that any asset transaction among SCGJWD subsidiaries must be conducted in accordance with market price or book value. Should there be any transaction, you are advised to consult your supervisor and act in agreement with the Company's accounting system.

8.2 SCGJWD Transactions with External Parties

Principle

In conducting transactions with external people, you are requested to comply with specified criteria and procedures according to laws and regulations issued by government departments and SCGJWD policy. You are advised to strictly request for approval in accord with SCGJWD power of attorney. Furthermore, you are requested to straightforwardly follow agreed conditions that is verifiable with transparency, by avoiding transactions that may cause any damage to SCGJWD or external people.

Guideline

- 1) You are requested to comply with identified procedures according to regulations and methods of SCGJWD procurement -- by considering juristic persons as priority and avoiding procurement with natural persons, except cases requiring individual expertise or specific benefits of SCGJWD.
- 2) In conducting transactions, you are advised to respect value, price according to market forces, received service quality – with no discrimination or trade barrier by unfair or illegal practices.
- 3) You are requested to avoid transactions that may affect society, environment or may cause defamation of SCGJWD; even though those particular trading may generate business benefits.
- 4) In conducting transactions unrelated to SCGJWD, you are requested not to apply the name SCGJWD, the Board of Directors, Management or employees – even though it does not affect SCGJWD directly.
- 5) You are advised to promote and support business partners to comply with the Code of Conduct for SCGJWD Business Partners and treat it as the standard in conducting businesses together.

Example

- 1) A foreign company proposes more reasonable price for a particular machine than that procured by a manufacturer directly. Are you capable of purchasing this machine?

Guideline You are capable of purchasing the machine. However, you are requested to examine it thoroughly in details -- to ascertain that the machine quality is matched with the amount of money to be invested, manufactured from appropriate sources and does not violate any intellectual property.

- 2) There are people wishing to purchase products or services from SCGJWD without issuing tax invoice to avoid paying value-added tax. Are you capable of conducting this transaction?

Guideline You are advised that this transaction not be conducted, as it is subject to tax laws compliance.

9. Business Competition, Anti-Unfair Competition and Prevention of Monopoly in Business

Principle

Adhering to conducting businesses with fair practices in accordance with laws, the Company implements Anti-Unfair Competition Policy to prevent monopoly and promote trading competition in relation to laws. Guidelines are developed for executives and employees to perceive and comply with, according to Antitrust Laws as follows:

Guideline

- 1) In consideration for pricing of the Company's products and services, it is expected that you are certain that the set price is not excessively lower than that of market price or lower than the Company's cost to the extent of competitive elimination in respective markets.
- 2) Avoid any action that may be of agreement among competitive operators to create monopoly or limit competition in particular markets such as price fixing, bid rigging and market share allocation.
- 3) In merger and acquisition, you are requested to consider and verify situations cautiously to ascertain that it will lead to no monopoly in respective markets or create unfair practices in competition.
- 4) You are requested to abstain from unfair trade practice or negotiation by employing power to determine conditions that may limit respective business partners' opportunities or alternatives, including domination among business operators in particular markets.

- 5) You are requested to support collaboration with trading competitors for consumer benefits -- not for monopoly in income and market share allocation, reduction of products and services quality as well as pricing of products and services that may lead to overall consumers disadvantages.

Example

- 1) You are invited by a competitor of SCGJWD to meet and exchange ideas regarding marketing plans for customer segmentation to minimize price reduction in the market. How should you act?

Guideline You are advised to decline a conversation in the topic, insist that SCGJWD employs the policy for its employees not to exchange opinions in the particular subject, and report the evidence to your supervisor afterwards.

10.Anti-Money Laundering

Principle

SCGJWD adheres to criteria and laws related to anti-money laundering, with commitment not to accept any transfer and change asset conditions, not to support any transfer acceptance as well as asset conditions changing in relation to wrongdoings -- to prevent anyone from employing SCGJWD as channels or tools for transfer, concealment or covering of illegally-acquired assets sources.

Guideline

- 1) Before conducting transactions with contract parties, you are requested to verify related evidences to ascertain that sources of acquired money are legal.
- 2) You are expected not to transfer money to anonymous accounts, and not to accept money transfer with uncommon payment characteristics -- especially from countries irrelevant to particular transactions.

- 3) Should you discover any unusual transaction, you are requested to report your supervisor immediately.

Example

- 1) A contract debtor would like SCGJWD to accept money transfer for payment from another person who is not a contract party and whom SCGJWD does not recognize. How should you act?

Guideline You are advised to avoid accepting debt payment of particular contracts from persons who are not contract parties. If necessary, you are requested to examine sources of money for every transaction, relationship between debtors and assignees as well as assignees' background.

- 2) A foreign debtor requests that he transfer money to SCGJWD for payment via tax haven countries. Is he capable of doing so?

Guideline He is capable of doing so, as money transfer of payment according to contracts via tax haven countries is considered legal. You are requested to ascertain that contract parties possess.