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Business Code of Conduct

JAS Asset Public Company Limited is committed to and places importance on conducting business with honesty, in accordance with good corporate governance and social responsibility principles toward all stakeholder groups. Therefore, this policy has been established as a standard and criteria for operations that reflect the shared responsibilities of the company's employees at all levels, from operational to managerial, without exception.

This policy will be effective only when all employees strictly adhere to and comply with it, not prioritizing their own preferences or convenience, but being aware of their comprehensive responsibilities toward the organization, all stakeholder groups, the surrounding community, and the environment. The company conducts business aiming for profitability while remaining cognizant of other responsibilities, both in terms of business ethics and ethics toward stakeholders.

Therefore, the company hereby declares that this “Business Code of Conduct” is in effect and binding upon the Board of Directors, executives, and employees at all levels in the company's subsidiaries and associated companies, as well as its business representatives and partners, who are required to acknowledge and comply with it universally.

Scope of Implementation of the Business Code of Conduct

This Business Code of Conduct is binding upon all functions that operate directly or indirectly with the *Jaymart Group Holdings Public Company Limited*, including its subsidiaries and associated companies, business representatives, and partners – from the Board of Directors, executives, to employees at all levels. It serves as a strict set of guidelines for collaborative operations based on genuine honesty, good corporate governance, and ethical principles.

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Definitions

Code of Conduct	Refers to the standards and good practices in conducting business that demonstrate the morals and ethics that all employees at every level must strictly adhere to as guidelines for their work performance.
Intellectual Property	Refers to the results of human invention and production, focusing on the output of intelligence and expertise, with legal ownership rights.
Money Laundering	Refers to the process of changing the source of money obtained from illegal activities by investing it in legitimate businesses or using the ill-gotten gains to conduct any operations to make it appear clean.
Non-Discrimination	Refers to the treatment of all employees at every level equally without any distinctions based on gender, sexual orientation, race, religion, ancestry, skin color, physical characteristics, social status, disability, or impairment, in order to provide equal standards of employment as part of the organization.
Occupational Health	Refers to the prevention of illnesses and accidents for employees to ensure their physical, mental, and environmental safety and well-being in the workplace to an appropriate and sufficient degree.

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The **Business Code of Conduct** consists of two main parts:

- Business Ethics
- Ethics toward Stakeholders

Business Ethics

1. Corporate Responsibility

The responsibilities of the directors, executives, and employees of the company are not only to collaborate in driving the business to generate value and positive business returns within the company but also to work with group companies, partners, and establish new collaborations that consider social and environmental responsibilities. This is an important matter that needs to be managed continuously alongside business operations.

Best Practices

- 1.1. The company aims to manage the leasing spaces of the shopping center and develop real estate businesses to meet the needs of the target customer group, while also contributing to the development of the surrounding community through activities organized by the company for the community and the company's participation in community activities. This will promote better coexistence and improve the quality of life for people in the community.
- 1.2. The company places great importance on the aging population, which continues to grow, by developing a comprehensive elderly care service business in collaboration with partners and experts in elderly care. This is to ensure that this group, often considered a "vulnerable group," receives proper and appropriate care.
- 1.3. In the construction business, while the company focuses on construction methods, it is also committed to incorporating innovations that align with high-quality structures, ensuring safety, responsibility, and the creation of happiness for the target customer group. The company operates with transparency and accountability, ensuring that all processes are verifiable.

2. Anti-Corruption & Whistleblowing

This is in accordance with the good practices outlined in the current anti-corruption policy, in order to uphold and emphasize conducting business with honesty, in line with good corporate governance and social responsibility principles toward all the company's stakeholders. The scope covers the following:

- 2.1. Gift and Hospitality
- 2.2. Sponsorship
- 2.3. Donations

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2.4. Political Contributions

2.5. Conflict of Interest

2.6. Facilitation Payment

2.7. Revolving Door

3. Confidentiality of Information & Insider Trading/Dealing)

The company is aware of the importance of maintaining confidentiality and proper use of the company's internal information, as it plays a crucial role in business operations. The company will only disclose critical company information that is required to be publicly disclosed according to the regulations of the Stock Exchange of Thailand and the Securities and Exchange Commission, in order to prevent leakage of sensitive information that could negatively impact the business in the future.

Best Practices

1. Maintaining confidentiality and secure use of information technology and information systems according to the company's IT policy, which is disclosed on the company's website.
2. The company is committed to protecting the confidentiality of customer information by implementing a Personal Data Protection Act (PDPA) policy, in accordance with the Personal Data Protection Act B.E. 2562 (2019) to ensure that information related to the customer's business activities is always kept confidential.
3. The company prohibits all employees from exploiting internal information related to the company's performance that could affect the stock price or securities. Employee's privy to such information are prohibited from disclosing it to unrelated parties and from trading the company's securities within 30 days before the quarterly or annual financial statements are publicly released.
4. The company prohibits all employees from disclosing other internal company information that is not designated for public disclosure, either directly or indirectly, for personal gain, even after leaving the company's employment.
5. The company prohibits all employees from disclosing confidential information specific to their department to other unrelated departments, whether verbally, in writing, or through any form of documentation, in order to avoid potential negative impacts within the company.

4. Antitrust/Anticompetitive Practices

The company respects the rules of business conduct and will strictly comply with competition laws, in order to avoid any actions that may negatively impact competitors, and to prevent engaging in monopolistic agreements or contracts.

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Best Practices

1. The company is committed to conducting business with transparency and fairness and will not engage in any activities that conflict with competition laws in any part of the organization, nor exploit other related operators, either directly or indirectly.
2. The company promotes fair business competition within a transparent framework and will not seek to obtain and disclose the confidential information of other operators through opaque means in order to undermine their credibility without justification.
3. The company will strictly adhere to the terms of contracts and will not coerce or threaten competitors to perform any actions outside of the agreed contract. If either party is unable to fulfill the agreed contract, they must promptly notify the counterparty in advance in order to find a resolution and prevent potential future damages.
4. The company will not engage in obstructing, constraining, or coercing other operators in the same business group, as this may result in negative impacts on their liquidity, revenue loss, loss of market value of goods or services, as well as loss of business opportunities.
5. The company will not discriminate against or favor certain operators in a manner that could be considered unfair.

5. Non-Infringement of Intellectual Property

The company places great importance on reviewing all new inventions, innovations, projects, and knowledge that will be publicly disseminated under the company's name to ensure they do not infringe on the intellectual property rights of others.

Best Practices

1. The company requires all departments to verify the information and works used within the company, or works published on behalf of the company, to ensure that such data and works do not infringe on the intellectual property rights of others, whether individual or corporate. This applies to work programs, supporting tools, and analytical processes, among others.
2. The company attaches great importance to respecting intellectual property rights, and instills a strong sense of awareness and good practice among employees to not infringe, copy, or modify the works of others and claim them as their own.
3. The company stipulates that any infringement of the intellectual property rights of employees at all levels, including copyrights, patents, utility models, trademarks, and trade secrets, is considered a serious offense that can negatively impact the company's credibility, and may result in disciplinary action according to the company's regulations.

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6. Disclosure and Transparency

The company stipulates that all types and records of company information must be presented and disclosed truthfully, without any concealment, distortion, or fabrication, as this could impact the company's credibility in the eyes of society.

Best Practices

1. The company requires employees and all departments to accurately record the key content of information or reports, and properly archive them, so that the data can be reviewed retrospectively or used as documentation to explain future operations.
2. The company mandates that for documents or reports requiring signatory approval, the relevant employees or departments must complete the process thoroughly to confirm the reliability and validity of the information contained therein.
3. The company strictly prohibits all employees at every level from arbitrarily changing, editing, or distorting the company's information without proper authorization from the decision-making authorities.
4. The company stipulates that the preparation of the company's key data and information, including public announcements, must strictly adhere to the regulations of the Stock Exchange of Thailand and the Securities and Exchange Commission, and be completed within the designated timelines.
5. The company will disclose the company's material information and announcements through diverse and effective channels, to ensure that all stakeholder groups can consistently access the data.

7. Anti-Money Laundering

The company does not condone any money laundering activities within the company. Therefore, when conducting transactions with new customers or partners, the relevant departments have the duty to ensure beforehand that the counterparty wishing to engage in business with the company is not involved in money laundering activities, nor has the intention to involve the company in any money laundering-related businesses.

Best Practices

1. The company requires the relevant departments to verify the customer or partner's name to ensure they operate their business transparently and are not involved in money laundering, before initiating any business dealings.
2. For the payment process between business parties, the company will only accept payments from or make payments to the contractual parties or designated recipients, with clear supporting documentation to verify the

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legitimacy and traceability of the transactions and will not engage with third parties or channels with unclear sources of funds.

8. Discrimination

The company places great importance on equal treatment of people within the organization, just as it is committed to conducting business efficiently and in accordance with good corporate governance principles. This is instilled in employees to not discriminate against personnel, to avoid segregation, and to respect each other's differences.

Best Practices

1. The company stipulates that the recruitment and selection of personnel at all levels and positions must be conducted with equality, using the same criteria without discrimination based on gender, sexual orientation, race, religion, ancestry, skin color, physical characteristics, social status, disability, or impairment.
2. The company sets the wages and benefits of employees at all levels in a fair and equitable manner, according to the standard for each job position.
3. The company ensures that employee training and development opportunities are accessible and non-discriminatory toward all levels of personnel, so that employees receive the knowledge and skill development provided by the company equally.
4. The company's organization of entertainment or recreational activities must be open and accessible to employees at all levels, with equal rights.
5. The company's employee performance evaluations and promotions must be conducted according to the established policies and criteria, with supervisors providing assessments objectively and fairly, without personal biases.
6. The company requires supervisors to oversee their subordinates with equality, accessibility, without obstructing work, and without discriminating against any employee.
7. The company mandates that all employees at every level must treat all stakeholder groups equally, without exception, and not favor certain stakeholders or individuals for unacceptable reasons.

9. Sexual Harassment

The company supports and embraces gender diversity and encourages all employees at every level to respect both those of the same gender and the opposite gender, without committing any acts that may cause discomfort or embarrassment to personnel within the organization, even if they are in a subordinate position.

Best Practices

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1. The company supports mutual respect among female, male, and alternative gender employees, whereby personnel at all levels – as supervisors, subordinates, and colleagues – should interact with polite language, without mockery, degradation, or diminishing the value of different gender identities.
2. The company strictly prohibits all employees at every level and position from committing any acts of sexual harassment or assault, whether verbal or physical that may cause discomfort, embarrassment, or a sense of insecurity for others, regardless of their gender.

9) Safety, Occupational Health, and Environment

Employees at all levels and positions are valuable resources for the company in continuously driving the business forward. Therefore, providing comprehensive safety, occupational health, and work environment for all employees is of utmost importance to the company. The company is committed to ensuring that all employees feel physically, mentally, and financially secure throughout their employment, and are provided with a good work environment.

Best Practices

1. The departments responsible for overseeing the orderliness of the office premises must regularly inspect the safety of the workplace according to the plan, to avoid any threats to the life and property of employees at all levels, as follows:
 - 1.1. The responsible departments must regularly check the functionality and quality of the elevators according to the set schedule and record the inspection in writing to confirm the check every time.
 - 1.2. The responsible departments must ensure that the lighting in all working areas is sufficient and always ready for use. If any department reports damage to the lighting, the responsible department must promptly repair it to restore full functionality.
 - 1.3. The responsible departments must ensure that all electrical appliances and *electronic equipment are always in good working condition and safe for users, to prevent any physical or property-related accidents.*
 - 1.4. *If there are any deteriorations or damage to the company's buildings and premises, such as leaking ceiling, cracked floor tiles, or burst water pipes, the responsible departments must urgently carry out the necessary repairs. During the repair work, warning signs must be placed to caution employees and prevent any accidents.*
 - 1.5. *The company prohibits any employee from placing objects that obstruct walkways or stairways under any circumstances.*
 - 1.6. *When driving company vehicles, pick-up trucks, or motorcycles within the company premises, all employees must drive at a safe speed and refrain from honking horns loudly, which may disturb other employees.*

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- 1.7. *The company has security personnel to oversee the safety aspects within the company premises.*
- 1.8. *The company prohibits all employees from engaging in any activities or behaviors that may cause damage to the company's buildings, premises, or properties.*
- 1.9. The company allows all employees to immediately report any observed hazards to the responsible departments, without neglecting such dangers.
2. The company encourages all employees to practice the 5S principles (Sort, Set in Order, Shine, Standardize, and Sustain) in their personal workstations and within their department's work areas, to prevent accidents and diseases.
3. The company has set up multiple water dispensers throughout the premises to ensure that employees always have access to clean and healthy drinking water.
4. The company maintains clean and adequate restroom facilities for the number of employees within the building premises.
5. The company employs cleaning personnel on each floor to maintain cleanliness in all areas, allowing employees to work in a clean and hygienic environment.
6. Waste is collected regularly by the cleaning staff on all building floors daily, for the good sanitation of employees, preventing the spread of germs and unpleasant odors during work.
7. The company provides mandatory fire evacuation training for all employees annually, to ensure their safety in the event of an emergency.

Code of Conduct toward Stakeholders

1) Code of Conduct Toward Employees

Employees at all levels, from operational to managerial, are invaluable resources for the organization. The company, therefore, has established various regulations, rules, and measures to ensure that employees enjoy a good quality of life, maintain good health, and have a stable and progressing career.

Best Practices

1. The company requires all employees at every level and position to perform their duties to the best of their abilities, and strictly adhere to the company's rules, regulations, and policies.
2. The company prohibits employees from engaging in any activities that may undermine the reputation of the company. Employees are also prohibited from misusing the company's name to conduct any actions that may harm the company.
3. The company requires all employees to strictly maintain the confidentiality of the company's sensitive information, and refrain from disclosing such information to any unauthorized parties, which may harm the company's business operations.

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4. The company treats all personnel at every level and position with equality, fairness, and without any form of discrimination.
5. The company determines employee compensation, benefits, and other perks appropriately and fairly, in accordance with legal requirements, without exploiting employees. These are comparable to industry standards.
6. The company promotes opportunities for employee advancement, following the correct company procedures and protocols.
7. The company conducts regular and effective performance evaluations of employees annually, based on their knowledge, skills, and abilities.
8. The company provides all employees at every level and position with adequate work equipment and facilities.
9. The company provides training and development opportunities to all employees to enhance their capabilities and skills, enabling them to progress and achieve job security.
10. The company prioritizes the safety and well-being of employees in the workplace, by providing a clean environment, good sanitation, physical and mental security, and safeguarding their property.
11. The company requires all employees at every level to treat their colleagues, superiors, and subordinates with respect, courtesy, and equality. Discrimination, harassment, or coercion that hinders efficient teamwork is prohibited. The company encourages employees to share their opinions and listen to their co-workers.

2) Code of Conduct Toward Shareholders

The company is committed to conducting business to the best of its ability with transparency and fairness. The company's long-term growth is considered by having operational plans that can be audited to create the highest satisfaction for both major and minor shareholders.

Best Practices

1. The company discloses important information to shareholders equally, including both financial and non-financial information, as well as positive and negative trends of the organization, based on sufficient and reliable information.
2. The company recognizes the equal rights of both minor and major shareholders, aiming to conduct business efficiently and to the best of its ability for the maximum benefit of all shareholders, allowing them to receive appropriate and sustainable returns.
3. The company conducts business with transparency and fairness, prohibiting the pursuit of benefits for oneself and others by disclosing the company's internal information that has not been made public to outsiders or engaging in any activities that may create conflicts of interest with the company.

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3) Code of Conduct Toward Customers

Providing customer satisfaction by offering quality products or services that meet customer needs and are worth the money paid by customers is a responsibility that the company must carry out efficiently. This builds customer trust without distorting or providing false information and without taking advantage of consumer rights.

Best Practices

1. The company will adhere to maintaining customer confidentiality and information as a top priority, unless consent is obtained from the customer, or the information must be disclosed according to legal regulations.
2. The company will disclose important information to customers transparently, without distorting or concealing information that customers need to know equally across all customer groups.
3. The company is committed to protecting the interests of customers as a top priority to ensure that customers receive the highest satisfaction, responding to customer needs quickly, promptly, and equally across all customer groups.

4) Code of Conduct Toward Business Partners, Creditors and Competitors

The company considers equality and honesty in conducting business and mutual benefits with business partners. It strictly complies with laws and regulations and upholds good business ethics and fair practices in business competition with transparency.

Best Practices

1. The company will strictly comply with the terms and conditions stated in the contracts mutually agreed upon, and will not take any actions that violate the contracts. In case any party needs to change the content or conditions of the contract, the party requesting the change must promptly notify the counterparty to discuss and find a solution together.
2. The company will not take any actions that unfairly favor any one party over business partners, creditors, and competitors. The company will treat all parties equally.
3. The company emphasizes treating business partners, creditors, and competitors with politeness, respect, and adhering to good competition principles within the legal framework.
4. The company will not improperly seek confidential information of competitors with the intention of undermining their credibility. The company is committed to fair and transparent business competition.
5. The company will not demand anything that violates the company's anti-corruption policy from business partners, creditors, and competitors in exchange for improper benefits, which would constitute direct or indirect corrupt practices.

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- The company emphasizes selecting business partners transparently in accordance with the company's procurement regulations, and maintaining mutual business interests with transparency, without engaging in any direct or indirect corrupt practices.

5) Code of Conduct Toward Directors and Executives

Directors and executives should perform their duties efficiently without violating good corporate governance principles and the company's anti-corruption policy, based on knowledge, capability, and transparency, in order to protect the interests of the company, shareholders, and all stakeholder groups.

Best Practices

- The company requires directors and executives to perform their duties responsibly in accordance with laws, company regulations, board resolutions, and shareholder resolutions (Fiduciary Duty) to maximize benefits for the company's operations.
- The company requires directors and executives to perform their duties to the best of their ability, with independent decision-making based on integrity, honesty, transparency, and avoidance of conflicts of interest with the company's interests.
- The company prohibits directors and executives from seeking personal benefits from their positions, including using information obtained as directors or executives in a way that may undermine public confidence in the company.
- The company prohibits directors and executives from being involved in any transactions unrelated to their responsibilities.
- The company requires directors and executives to maintain confidentiality of the company's and stakeholders' information that may negatively impact the company.
- The company requires the establishment of internal control systems, risk management, and good corporate governance practices at all levels.

6) Code of Conduct Toward Society, Community and Environment

Conducting business to seek good returns for the organization is important, but the company does not neglect its responsibilities toward society, local communities, and the environment. To that end, the company supports and promotes projects that help improve quality of life and mitigate the company's impacts on society, communities, and the environment.

Best Practices

- The company will conduct business responsibly toward society, not engaging in operations that violate social norms, and cooperating strictly with relevant social activities.

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2. The company will not take any actions that may undermine society's confidence in the company's business operations, both presently and in the future.
3. The company promotes activities and projects that help elevate the quality of life, education, and knowledge sharing for people in communities near the company.
4. The company emphasizes maintaining good relationships and mutual reliance with local communities when appropriate opportunities arise.
5. The company will not take any actions that directly or indirectly impact the well-being of people in local communities.
6. The company adheres to the 4R principle of Reduce, Reuse, Recycle, and Revalue by promoting projects aligned with the 4Rs that reach employees at all levels and can be practically implemented in their work.
7. The company is committed to fostering environmental awareness as an integral part of the corporate culture.
8. If there are complaints from society or local communities, the company will listen and promptly take corrective actions, as well as finding ways to prevent such issues from reoccurring.
9. The company emphasizes conducting business while taking into account potential impacts on society, communities and the environment as a top priority.

7) Code of Conduct Toward Government Agencies and External Organizations

The company respects the rules, regulations, and requirements for cooperation between government agencies and external organizations. It will strictly follow procedures to prevent any actions that may raise suspicions of direct or indirect corruption.

Best Practices

1. The company requires that all transactions with government agencies and external organizations must strictly follow correct procedures, prohibiting the use of power or means that could be considered corruption in the cooperation process.
2. The company will strictly comply with relevant laws, rules, and regulations related to business operations.
3. The company will disclose important company information correctly and clearly according to regulations, without concealing or providing false information.
4. The company encourages all employees at all levels and positions to conduct themselves as good citizens in accordance with their legal rights.

Penalties for Policy Violations

Scope of Penalties

Relevant parties will consider the scope of penalties in each case based on the severity of the impact on the company in these three areas:

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1. Impact on the company's reputation and credibility in society.
2. Impact on the company's asset and monetary losses.
3. Impact on the company's internal processes and operations.

Types of Penalties for Violating the Code of Business Conduct

1. Suspension for a specified period.
2. Payment of compensation according to the agreed damage value between the company and the offender.
3. Termination of employment and ineligibility for re-employment at the company, subsidiaries, or affiliates
4. Legal prosecution to the fullest extent.

Penalties for Violating the Code of Business Conduct

1. If individuals subject to this policy intentionally neglect to comply with the policy, resulting in negative impacts on the company, the company reserves the right to immediately impose penalties according to the types of penalties for misconduct.
2. Individuals subject to this policy cannot use the excuse of "being unaware of the policy" as a reason for violating it, as the company has communicated the policy through various channels to employees.
3. If an employee commits a violation and their supervisor ignores or fails to take corrective action according to the policy, the supervisor will be subject to disciplinary action, up to and including termination of employment.
4. If the company's business representatives and partners intentionally neglect or act in violation of this policy, the company reserves the right to consider terminating contracts or business dealings with them.

Policy Review and Update Schedule

The department responsible for this policy is required to annually review and update the details of each process to keep it current with situations, to be presented for approval by the company's Board of Directors.

This policy shall be effective from November 11, 2024 onwards.



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Approver of the Code of Conduct

Mr. Sukont Kanjanahuttakit

Chairman of the Board

