

	<b>PRTR Group Public Company Limited</b>	Revision	07
	<b>Company Regulations</b>	Date of approval	10 Nov 2025
	<b>Code of Conduct and Business Ethics of the Company</b>	Page	1 / 18



PRTR Group Public Company Limited.

Company Regulations

Subject

Code of Conduct and Business Ethics of the Company.

---

	<b>PRTR Group Public Company Limited</b> <b>Company Regulations</b> <b>Code of Conduct and Business Ethics of</b> <b>the Company</b>	Revision	07
		Date of approval	10 Nov 2025
		Page	2 / 18

This Code of Conduct and Business Ethics is the copyrighted property of PRTR Group Public Company Limited (“the Company”). It reflects the Company's commitment to developing a corporate governance system that aligns with the principles of good corporate governance, best practices, as well as the laws, rules, and regulations of government authorities and regulatory bodies.

The Board of Directors approved this Code of Conduct and Business Ethics during Meeting No. 1/2020 on February 28, 2020, to serve as the principles and implementation guidelines for executives, employees, and relevant parties of the Company and its subsidiaries, effective from March 1, 2020, onwards.

To ensure that the Code of Conduct and Business Ethics remains current and appropriate to evolving situations and changes, it shall be reviewed at least once a year. Any amendments or revisions must be approved solely by the Board of Directors.



(Mr. Niphon Bundechanan)

Acting Chairman of the Board of Directors.

	<b>PRTR Group Public Company Limited</b> <b>Company Regulations</b> <b>Code of Conduct and Business Ethics of</b> <b>the Company</b>	Revision	07
		Date of approval	10 Nov 2025
		Page	3 / 18

## Table of Contents

1. Introduction	4
2. Objectives	4
3. Scope	4
4. Code of Conduct and Business Ethics of the Company	4
5. Revision History	18

---

	<p align="center"><b>PRTR Group Public Company Limited</b></p> <p align="center"><b>Company Regulations</b></p> <p align="center"><b>Code of Conduct and Business Ethics of</b></p> <p align="center"><b>the Company</b></p>	Revision	07
		Date of approval	10 Nov 2025
		Page	4 / 18

## 1. Introduction

The Company is committed to establishing corporate governance mechanisms that ensure business operations are conducted with social and environmental responsibility, as well as accountability to all stakeholders. We respect the rights of stakeholders and carefully consider the impact and efficient use of resources. Such practices are grounded in ethics and a code of conduct, which are essential for creating sustainable value for the enterprise. Accordingly, the Company has established this Code of Conduct and Business Ethics to serve as a fundamental guiding principle for all personnel.

## 2. Objectives

- 2.1 To establish the Company's Code of Conduct and Business Ethics as a standardized framework, ensuring consistent adherence across the Company, its subsidiaries, and its associates.
- 2.2 To serve as a formal written communication tool for the Company's Code of Conduct and Business Ethics, fostering a mutual and clear understanding among all personnel of the Company, its subsidiaries, and its associates.

## 3. Scope

This Code of Conduct shall apply to the Company, its subsidiaries, and its associates, including directors, executives, staff, employees, advisors, and contractors, as well as any persons acting on behalf of or assigned to perform duties in the name of the Company or the aforementioned persons. This scope encompasses both the core principles and the implementation guidelines.

## 4. Code of Conduct and Business Ethics of the Company

The Company has established this Code of Conduct and Business Ethics as a set of principles and implementation guidelines to be observed as follows:

### Principles

#### Principle 1: Integrity

	<b>PRTR Group Public Company Limited</b> <b>Company Regulations</b> <b>Code of Conduct and Business Ethics of</b> <b>the Company</b>	Revision	07
		Date of approval	10 Nov 2025
		Page	5 / 18

The Company firmly believes that conducting business with honesty and integrity toward customers, business partners, debtors, creditors, job candidates, as well as all stakeholders and relevant parties, is fundamental to fostering faith, credibility, and trust in the Company.

#### Principle 2: Compliance

The Company conducts its business in strict adherence to the laws and regulations issued by government authorities and regulatory bodies. To ensure full compliance with relevant standards and legal requirements, the Company has established effective internal control and audit mechanisms, which are subject to inspection by Internal Audit and oversight by the Audit Committee.

#### Principle 3: Confidentiality

The Company conducts its business with full respect for the rights of data owners. All information received and stored by the Company shall be maintained as strictly confidential and shall not be disclosed to unauthorized parties.

#### Principle 4: Professional Competency

The Company recognizes the importance of the knowledge, abilities, skills, and experience required for performing one's duties to effectively respond to and fulfill service requirements.

### Guidelines

The Company shall adhere to the Code of Conduct and Business Ethics as follows:

#### 1. Honesty

- 1) Conduct business with unwavering honesty and integrity in all aspects.
  - 2) Perform duties with integrity, ensuring that all decisions are made with transparency, impartiality, and primarily for the benefit of the Company and its shareholders.
  - 3) Refrain from seeking personal gain or benefits for related parties by utilizing any non-public Company information.
-

	<b>PRTR Group Public Company Limited</b> <b>Company Regulations</b> <b>Code of Conduct and Business Ethics of</b> <b>the Company</b>	Revision	07
		Date of approval	10 Nov 2025
		Page	6 / 18

- 4) Uphold the principle of integrity toward all parties maintaining business relations with the Company, and exert every effort to avoid bias or any situation that may lead to a conflict of interest.
- 5) Commit to conducting business with principled discipline, ensuring that all business decisions and operations comply with relevant laws and regulations, while adhering to the Company's high ethical standards and employee code of conduct.
- 6) Refrain from seeking personal gain or benefits for related parties by utilizing any non-public Company information.
- 7) Abstain from any actions that may result in a conflict of interest with the Company without prior disclosure, whether through dealings with the Company's business associates or by exploiting Company information for personal gain.
- 8) Engage in commercial competition within the framework of fair play; refrain from seeking competitors' confidential information through dishonest or inappropriate means, and avoid disparaging the reputation of competitors.

#### **Comply with laws and regulations.**

- 1) Conduct all business operations in strict compliance with applicable laws and regulations issued by government and regulatory authorities, such as the Securities and Exchange Act, the Public Limited Companies Act, and the regulations of the Stock Exchange of Thailand (SET) and the Office of the Securities and Exchange Commission (SEC), among others.
- 2) Refrain from cooperating with, assisting, promoting, or supporting any activities or transactions that appear to be unlawful or in violation of any legal requirements.
- 3) Maintain strict political neutrality and refrain from any actions that demonstrate affiliation with or bias toward any political group or party. The Company remains committed to fostering social prosperity and environmental conservation.

#### **Confidentiality**

---

	<p style="text-align: center;"><b>PRTR Group Public Company Limited</b></p> <p style="text-align: center;"><b>Company Regulations</b></p> <p style="text-align: center;"><b>Code of Conduct and Business Ethics of</b></p> <p style="text-align: center;"><b>the Company</b></p>	Revision	07
		Date of approval	10 Nov 2025
		Page	7 / 18

- 1) Collect, store, and safeguard all confidential information of the Company, customers, business partners, and candidates to foster trust and confidence among customers, stakeholders, and all relevant parties.
- 2) Refrain from disclosing confidential information pertaining to the Company, customers, business partners, or candidates to any third parties, particularly to the Company's competitors.

#### **Functional Competencies**

- 1) Conduct business with professional responsibility and a steadfast commitment to achieving the Company's strategies, objectives, and goals.
- 2) Respond effectively to the needs of customers, society, and technological and economic shifts, while proactively and swiftly adapting to both current and future customer requirements.
- 3) Execute duties by leveraging knowledge, abilities, skills, and management experience to the fullest extent for the benefit of the Company and its shareholders.
- 4) Commit to achieving customer satisfaction by delivering high-quality products and providing service excellence, including the establishment of efficient systems and channels for handling customer grievances and feedback.
- 5) Strive for continuous operational excellence while maintaining a high level of awareness regarding both present and future risks.
- 6) Recruit, hire, and continuously develop personnel to enhance their competencies, while ensuring that salaries, compensation, and other benefits remain competitive and comparable to those of leading industry peers to attract and retain talent.

#### **2. Respect for human rights**

The Group of Companies prioritizes the respect for human rights, with a steadfast commitment to equality and equity. We do not discriminate based on race, religion, national origin, gender, skin color, age, physical ability, sexual orientation, political opinion, social status, education, or any other status. Furthermore, we uphold the respect for individuality and human dignity in accordance with international human rights norms, including the United Nations Declarations and relevant Human Rights Conventions.

	<b>PRTR Group Public Company Limited</b> <b>Company Regulations</b> <b>Code of Conduct and Business Ethics of</b> <b>the Company</b>	Revision	07
		Date of approval	10 Nov 2025
		Page	8 / 18

The Company personnel shall respect the personal dignity and rights of all individuals with whom they interact during the course of their work. They must refrain from any actions that cause, or contribute to, the violation or infringement of human rights.

### 3. Treatment of Shareholders

As the owners of the Company, shareholders are entitled to fair and equitable treatment in accordance with their rights as prescribed by law and the Company's Articles of Association. These include, but are not limited to, the right to attend shareholders' meetings, the right to vote, the right to express opinions freely, and the right to receive fair returns on investment.

The Company is committed to creating value for its shareholders through revenue growth and operational efficiency improvements. Our goal is to provide shareholders with long-term returns that outperform other investments with comparable risk profiles.

The Company personnel shall encourage and support shareholders in exercising their rights. Shareholders must be treated with respect, and their opinions or grievances must be addressed. Furthermore, personnel must ensure the accurate and complete disclosure of information regarding the Group of Companies and conduct business operations for the ultimate benefit of the Company and its shareholders as a whole.

### 4. Treatment of Customers

The Group of Companies is committed to fostering customer satisfaction and confidence by prioritizing product and service quality, safety, customer responsibility, and data privacy. Furthermore, we consistently monitor and measure customer satisfaction to drive the continuous development and improvement of our offerings. The success of the Group of Companies is intrinsically linked to our ability to cultivate and sustain positive, long-term relationships with our customers.

Company personnel shall communicate with customers with respect and attentiveness. They are expected to actively listen to feedback or grievances, understand and anticipate customer needs, and consistently deliver products and services that fulfill those requirements. This commitment is essential to ensuring enduring and sustainable customer relationships.

### 5. Treatment of employees

Employees are the Company's most valuable assets in its business operations. Creating a positive work environment fosters fair employment practices and promotes valuable ethical conduct.

	<b>PRTR Group Public Company Limited</b> <b>Company Regulations</b> <b>Code of Conduct and Business Ethics of</b> <b>the Company</b>	Revision	07
		Date of approval	10 Nov 2025
		Page	9 / 18

The Group of Companies is committed to establishing an optimal working environment by recognizing and respecting fundamental labor rights in accordance with the International Labour Organization (ILO) standards. This includes, but is not limited to, the freedom of association, collective bargaining and labor relations, the elimination of child labor, the prohibition of forced labor, equal opportunity and treatment, and occupational health and safety.

Employees are entitled to equal opportunity and fair treatment. Adherence to human and labor rights, applicable laws and regulations, as well as the Corporate Governance Policy and this Code of Business Conduct, serves as the foundation for the relationship between the Group of Companies and its employees, as well as among employees themselves.

Employees are entitled to appropriate compensation and benefits, determined by the nature of their work, individual performance, and the Group's overall business results. They shall have access to both internal and external training to enhance their potential, as well as opportunities for career advancement, participation in organizational engagement activities, and a safe and healthy working environment. Furthermore, the Company recognizes that a healthy work-life balance promotes operational efficiency for the ultimate benefit of the Company.

The Company personnel shall perform their duties with responsibility, honesty, and a firm adherence to ethical standards.

The Company personnel must treat colleagues and all individuals with whom they interact during the course of their work with respect and an open mind, listening to opinions based on reason. They must refrain from any acts of discrimination or bias based on race, religion, national origin, gender, skin color, age, physical ability, sexual orientation, political opinion, social status, education, or any other status. In this regard, the Company maintains a zero-tolerance policy toward any unacceptable behavior or actions that insult human dignity in the workplace. This includes psychological abuse, discrimination, sexual harassment, as well as the use of gestures, language, or physical contact that is sexual, coercive, threatening, derogatory, or exploitative in nature.

The Company personnel shall collectively foster a positive corporate culture and working atmosphere while actively promoting effective teamwork.

## **6. Treatment of Business Partners**

The Group of Companies recognizes that business partners play a vital role in our business operations, competitiveness, and the production of goods and services. Accordingly, the Group adheres to

---

	<p style="text-align: center;"><b>PRTR Group Public Company Limited</b></p> <p style="text-align: center;"><b>Company Regulations</b></p> <p style="text-align: center;"><b>Code of Conduct and Business Ethics of</b></p> <p style="text-align: center;"><b>the Company</b></p>	Revision	07
		Date of approval	10 Nov 2025
		Page	10 / 18

the principles of non-discrimination and equal opportunity in the selection of business partners and in our mutual business dealings. We strive to develop and maintain positive relationships with our partners, fostering long-term strategic alliances that support mutual business growth.

The Company personnel shall treat business partners with transparency and fairness. The selection of business partners must strictly follow the Company's established procurement processes. Negotiations and contractual agreements shall be conducted based on terms and compensation that are fair to both parties. Furthermore, personnel must ensure full compliance with contractual obligations, the Corporate Governance Policy, and this Code of Business Conduct in all interactions with business partners.

#### **7. Treatment of Business Competitors**

The Group of Companies conducts its business with integrity and professionalism, advocating for free and fair competition. We shall refrain from any actions that violate domestic or international competition laws.

The Company personnel must interact with competitors in accordance with the law, the Corporate Governance Policy, and this Code of Business Conduct. The focus remains on fair, honest, and transparent competition. Personnel shall not engage in any activities that disparage or damage the reputation of competitors through baseless accusations. Furthermore, the acquisition of a competitor's information or trade secrets through dishonest or inappropriate means is strictly prohibited.

#### **8. Treatment of creditors**

The Group of Companies focuses on building trust and confidence among its creditors by treating them with integrity, transparency, and equity.

The Company and its personnel shall strictly adhere to the terms and conditions of agreements made with creditors. This includes ensuring the accurate and punctual payment of principal and interest, as well as ensuring that borrowed funds are not utilized in a manner inconsistent with the agreed-upon borrowing objectives. Furthermore, personnel must not conceal any information or facts that could cause damage or prejudice to the Group's creditors.

#### **9. Social Responsibility**

Conducting business with social and community consciousness is a vital driving force toward sustainable development at both the local and national levels.

The Group of Companies is steadfast in its commitment to advancing the United Nations Sustainable Development Goals (SDGs). Our objective is to elevate the quality of life and well-being within

---

	<b>PRTR Group Public Company Limited</b> <b>Company Regulations</b> <b>Code of Conduct and Business Ethics of</b> <b>the Company</b>	Revision	07
		Date of approval	10 Nov 2025
		Page	11 / 18

society and local communities, thereby fostering strength and contributing to the collective welfare of the public.

The Group of Companies consistently supports initiatives that promote social and community development. These efforts not only address the needs of society and the expectations of relevant stakeholders but also encourage our personnel to actively engage in and recognize their social responsibilities in a tangible manner.

The Company personnel are encouraged to participate in the Group’s social and community activities, which are held regularly across all regions nationwide.

#### **10. Environmental Responsibility**

The Group of Companies focuses on maintaining a balance between economic interests and environmental consciousness. We conduct our business, develop, and improve our operations to be environmentally friendly or to minimize environmental impact, in accordance with both domestic and internationally recognized environmental laws and standards. Furthermore, we consistently foster a corporate culture of environmental stewardship within the organization.

The Company personnel shall participate in achieving these goals by collectively preventing and managing the efficient use of limited resources, such as energy and water. This includes participating in the reduction of emissions and the management of waste that pollutes the environment, such as carbon dioxide and air emissions, or waste in water sources. Additionally, personnel shall engage in procurement and the selection of business partners who share the same environmental consciousness as the Group of Companies.

#### **11. Occupational Health and Safety**

The Group of Companies prioritizes the creation of a safe and healthy work environment in accordance with occupational health standards. We are committed to fostering a culture of safety and health within the workplace. To this end, the Group has established a Safety Committee to determine measures for preventing workplace accidents and occupational diseases, in compliance with domestic and internationally recognized laws and safety standards.

The Company personnel have a duty to support the Company’s commitment by strictly adhering to all safety and occupational health requirements and regulations. Personnel are expected to regularly attend training sessions and stay informed through safety communications. Furthermore, they must be able to identify, report, and participate in preventing or mitigating risks that could jeopardize workplace safety and health.

	<b>PRTR Group Public Company Limited</b> <b>Company Regulations</b> <b>Code of Conduct and Business Ethics of</b> <b>the Company</b>	Revision	07
		Date of approval	10 Nov 2025
		Page	12 / 18

The Company personnel shall also uphold occupational health and safety principles when selecting business partners and in their mutual business dealings.

## 12. Anti-Corruption

Corruption refers to the unlawful seeking of benefits for oneself or others in any form, whether direct or indirect. This encompasses bribery, political contributions, charitable donations, sponsorships, gifts, hospitality expenses, and other expenditures. This is particularly applicable if such actions involve the abuse of power—whether through offering, promising, accepting, requesting, demanding, giving or receiving bribes, or inducing illegal acts or breaches of trust. Any such misconduct results in unfairness and causes damage to the Company, the economy, and society. Therefore, expressing a commitment to anti-corruption is considered a collective benefit for everyone.

The Group of Companies is firmly committed to anti-corruption and maintains a zero-tolerance policy toward all forms of corruption. The Company has no policy to penalize or take negative action against any personnel who refuse to engage in corruption, even if such refusal results in the loss of a business opportunity for the Group.

The Company personnel, including individuals involved in the Company's business operations, must strictly comply with the Company's Anti-Corruption Policy. They must not participate in any form of corruption, directly or indirectly, prioritizing transparency and integrity in all dealings with business partners, government officials, or various agencies. This is to avoid any actions that could be deemed inappropriate, conflict with the Company's Anti-Corruption Policy, or violate anti-corruption laws.

For further details, please refer to the Anti-Corruption Measures on the Company's website at: <https://investor.prtr.com/th/corporate-governance/whistleblowing-channel#menu> as well as the Fraud Risk Management Policy and relevant guidelines and procedures available on the Company's Intranet system.

## 13. Anti-Money Laundering (AML)

The Group of Companies strictly adheres to the Anti-Money Laundering Act and opposes all forms of money laundering. This is to prevent any individual from using the Group as a channel or instrument to transfer, conceal, or disguise the origins of illegally obtained assets, making them appear as if they were derived from legitimate business operations.

	<b>PRTR Group Public Company Limited</b> <b>Company Regulations</b> <b>Code of Conduct and Business Ethics of</b> <b>the Company</b>	Revision	07
		Date of approval	10 Nov 2025
		Page	13 / 18

The Company personnel must exercise due diligence in the selection of business partners and conduct thorough background checks. Business must be conducted lawfully, ensuring that no practices could be construed as money laundering or providing support for money laundering activities.

The Company personnel must be vigilant and monitor for any transfers or conversions of assets, or any support thereof, that involve illegal payment methods or are intended to disguise the nature of transactions with the Company.

#### **14. Political activities**

The Group of Companies is an organization firmly committed to political neutrality, supporting legal compliance and democratic governance. The Company maintains no policy to provide financial or other forms of political support or assistance to any political party, politician, or politically affiliated individual.

The Group of Companies respects and encourages its personnel to exercise their political rights within the framework of the law as responsible citizens.

The Company personnel have the right to express their views, participate in, or support political activities outside of working hours in their private capacity and using their own resources. They must not engage in any political activities in the Company's name, within Company premises, or utilize Company resources for such purposes. Furthermore, personnel must exercise caution to avoid any actions that could lead to the misunderstanding that the Company supports or is affiliated with any specific political party.

#### **15. Non-infringement of intellectual property**

Intellectual property is a valuable asset in business operations and can significantly impact competitiveness. The Group of Companies recognizes the importance of intellectual property and respects the intellectual property rights of others. Intellectual property includes, but is not limited to, trademarks, copyrights, patents, inventions, trade secrets, and technical know-how.

The Company personnel are responsible for maintaining the confidentiality of the trade secrets and know-how used in the Group's business operations. Furthermore, they must monitor and safeguard the Company's intellectual property from unauthorized access, transmission, or unlawful use. Personnel must also respect and refrain from infringing upon the intellectual property rights of others.

	<b>PRTR Group Public Company Limited</b> <b>Company Regulations</b> <b>Code of Conduct and Business Ethics of</b> <b>the Company</b>	Revision	07
		Date of approval	10 Nov 2025
		Page	14 / 18

## 16. Confidentiality

Critical or confidential information is a valuable asset of the Group of Companies. Unauthorized access to or disclosure of such information to third parties may diminish its value and could result in significant damage to the Group's business and relevant individuals.

Information obtained from or pertaining to customers, employees, or third parties must be protected and maintained in strict confidence, in accordance with applicable laws and contractual obligations.

The Company personnel must recognize the significance of the information they are authorized to access and must exercise utmost caution when communicating, providing, or transmitting data related to the Company or the Group. This is to prevent data leakage and to ensure that third parties or unauthorized individuals do not misuse or disseminate such information. If critical or confidential information must be provided or transmitted to a third party, Company personnel must ensure that a Confidentiality Agreement (Non-Disclosure Agreement) has been duly executed with said party.

The Company personnel have a continuous duty to maintain confidentiality and refrain from disclosing critical or confidential information to third parties, even after their employment or engagement with the Company has ended—whether through retirement, resignation, termination, or expiration of contract—for as long as such information remains confidential.

## 17. Personal Data Protection

In the present era, internet access, communication, and data exchange via electronic media are paramount to business operations and overall success. However, advancements in information technology bring inherent risks to privacy and personal data protection. The Group of Companies recognizes the significance of and its responsibility for the effective management of information technology.

The collection, processing, or use of personal data—such as information obtained from or pertaining to customers, employees, or third parties—must be conducted solely for legitimate business purposes. This specifically includes supporting operations, ensuring effective customer care, engaging in business or commercial activities, and maintaining proper human resource management.

The Company personnel must handle personal data with the utmost care and diligence. They shall collect, process, and use personal data only as authorized and in strict compliance with relevant data protection laws. Furthermore, personnel are prohibited from utilizing such data for personal gain or in any inappropriate manner.

	<b>PRTR Group Public Company Limited</b> <b>Company Regulations</b> <b>Code of Conduct and Business Ethics of</b> <b>the Company</b>	Revision	07
		Date of approval	10 Nov 2025
		Page	15 / 18

## 18. Securities Trading

The Group of Companies recognizes the paramount importance of preventing the use of inside information for the personal gain of its personnel or other related parties. Utilizing inside information for securities trading constitutes an offense under the Securities and Exchange Act. "Inside Information" refers to any non-public information that could significantly impact the Company's securities price or influence an investor's decision-making process.

The Company personnel must strictly adhere to the Company's Insider Trading Prevention Policy. If personnel possess or receive inside information concerning the Group—whether through the course of their duties or from any other source—they are strictly prohibited from using such information for their own benefit or for the benefit of others in trading the securities of the Company or its subsidiaries. Furthermore, personnel must not disclose inside information to third parties or unauthorized individuals, directly or indirectly, as long as such information has not been publicly disseminated through the Stock Exchange of Thailand, or until such information loses its impact on the securities price or investment decisions. Trading in the Company's or its subsidiaries' securities is also strictly prohibited during "Blackout Periods" prior to the disclosure of financial statements or other material transactions, in accordance with the rules and procedures prescribed in the Insider Trading Prevention Policy.

The Company personnel are responsible for ensuring that their related persons—such as spouses, cohabitants, and minor children—as well as business associates with access to inside information, do not act in violation of the Insider Trading Prevention Policy.

Should there be any ambiguity or questions regarding securities trading, personnel are encouraged to consult the Legal Department or the Company Secretary.

## 19. Conflict of Interest

Conflict of Interest refers to any situation where personal or external interests conflict with the best interests of the Group of Companies. Personal interests may include financial gains, personal relationships, or any other associations that could impair an individual's judgment and decision-making process.

The Company personnel must perform their duties with honesty, integrity, and accountability to the Company. They are obligated to protect the Company's interests and avoid creating conflicts of interest. Personnel must not abuse their authority to influence decisions for personal gain, and they must resolve any conflict of interest issues independently within an ethical framework. Furthermore, full disclosure of any such interests is required, prioritizing the collective benefit of the Company above all else.

	<b>PRTR Group Public Company Limited</b> <b>Company Regulations</b> <b>Code of Conduct and Business Ethics of</b> <b>the Company</b>	Revision	07
		Date of approval	10 Nov 2025
		Page	16 / 18

The Company personnel shall not engage in any business that competes with or is of a similar nature to the Group’s business. They are also prohibited from seeking personal gain through the use of the Group’s inside information or their specific position and responsibilities within the Company.

The Company personnel must not hold external duties or positions that could adversely affect their performance or professional efficiency, unless such duties or positions have been approved in writing by their supervisor.

## 20. Reporting and Grievance Procedures

The Company personnel shall not disregard or ignore any violation of this Code of Business Conduct, including any other Company regulations or policies.

Should there be any inquiries or a need for specific guidance, Company personnel may consult their direct supervisor or contact the Human Resources Department at: **Telephone: +66 (0) 2 716 0000**  
**Email: [humanresources@prtr.com](mailto:humanresources@prtr.com)**

In the event of a witnessed violation or an act that may constitute a breach of the policies and guidelines set forth in this Code of Business Conduct, Company personnel may report the incident or lodge a formal complaint through their direct supervisor or the Human Resources Department via the following channels:

Email: [humanresources@prtr.com](mailto:humanresources@prtr.com)  
Postal: PRTR Group Company Limited (Public Sector)  
Human Resources Department  
2034/82 Italthai Tower, 18th Floor, New Phetchaburi Road, Bangkok Huai  
Khwang, Bangkok 10310 , Thailand

All information shall be treated as strictly confidential, and reporters or whistleblowers may choose to remain anonymous. To ensure the protection of the reporter's or whistleblower's rights, the Company shall keep their identity and any identifiable information confidential. All related information and evidentiary documents will be maintained in strict confidence and accessible only to those authorized individuals responsible for investigating the complaint.

	<b>PRTR Group Public Company Limited</b> <b>Company Regulations</b> <b>Code of Conduct and Business Ethics of</b> <b>the Company</b>	Revision	07
		Date of approval	10 Nov 2025
		Page	17 / 18

## 21. Penalties

The Company personnel who violate this Code of Business Conduct, or any other Company regulations and policies, resulting in or potentially causing damage or negative impact to the Group, shall be subject to legal penalties as applicable. Furthermore, such actions constitute a breach of the Company's Work Rules and Regulations, which entails disciplinary action. Disciplinary penalties are categorized into five levels, depending on the nature, severity, or consequences of the misconduct, as follows:

1. Verbal Warning
2. Written Warning
3. Suspension from Work
4. Termination of Employment with Severance Pay; and/or
5. Termination of Employment without Severance Pay

In addition, Company personnel may be subject to disciplinary action for soliciting others to commit violations, failing to report a violation promptly, refusing to cooperate in investigations of potential misconduct, filing false reports or complaints, or engaging in any form of retaliation or harassment against individuals who report or lodge complaints in good faith.



## Appendix: List of Companies Subject to This Policy

This policy applies to **PRTR Group Public Company Limited**, as well as its subsidiaries under its direct or indirect control.

The companies within the scope of this policy include the following:

1. PRTR Recruitment Company Limited
2. PRTR Recruitment and Outsourcing (Eastern Seaboard) Company Limited
3. Nexmove Platform Recruitment Company Limited
4. The Blacksmith Company Limited
5. Pinno Solutions Company Limited
6. PRTR Global Recruitment Company Limited
7. Biz Resource Company Limited

---

### Remarks:

- Newly established subsidiaries or subsequent investments shall automatically fall within the scope of this policy, unless otherwise specified.
- For companies not under the Company's control, this policy may be adopted and applied as appropriate.

**Additional Note:** This appendix shall be deemed an integral part of this policy and shall have the same full force and effect as the main policy in all respects.