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Code of Conduct

In order to achieve the intention of operating business in accordance with the Company's objectives, the Company adheres to morality, honesty and transparency which are important in business operations and the Company does not operate any business that is prohibited by the law or is contrary to peace or good morals.

Treatment of Stakeholders

The Company places importance on and treats stakeholders fairly, respects their rights, creates understanding with stakeholders, and promotes creative cooperation in order for the Company to be able to operate the business sustainably. This was done by clearly defining, classifying, and grouping stakeholder and recognizing that each stakeholder group has different views and expectations. Therefore, the strategies and treatment of stakeholders should be established differently. These are classified into the following 9 groups:

1) Treatment of Shareholders

The Company attaches great importance to all shareholders and is committed to conducting business in accordance with the Company's code of conduct in order to create satisfaction and the greatest benefit for shareholders. This is done by taking into account sustainable growth, creating more value, and continually giving appropriate return. The guidelines are as follows.

(1) Manage and perform duties with maximum ability, honesty, integrity, fairness, caution and without conflict of personal interest for the maximum benefit of every shareholder.

(2) Not seek the benefit of one's self or those involved by using insider information that has not been disclosed to the public. Not disclose any confidential information that will result in Company losses.

(3) Disclose the Company's important information, report the financial position and the operating results. This includes the disclosure of the Company's future trends accurately, completely, timely, transparent, and reliably for all shareholders equally and be aware regularly of the Company's business operations through channels that shareholders can easily access information.

(4) Give opportunities and appropriate time for shareholders to propose matters to be included in the Meeting agenda and nominate directors in advance, prior to the General Meeting of Shareholders. This includes explaining the details of the Shareholders' Meeting and giving all relevant information to the shareholders in order to make decisions at the Meeting.

2) Treatment of Employees

The Company is determined to develop the organization to be an organization of learning and provide freedom of creativity, promote the development of skills, continually increase potential, and provide fair returns. This includes caring for the health, safety, and work environment and being aware of the value of all employees who are a factor in success and sustainable growth. The guidelines are as follows.

(1) Strictly comply with the law, rules, and regulations related to employees. Treat all employees fairly and equally. Do not discriminate on the basis of race, gender, color, religion, nationality, age, physical disability, or personal characteristics which are unrelated to business operations. This includes not threatening, terrorizing or any other similar action.

(2) Manage human resources to be consistent and support the strategies and objectives of the organization. There is a performance evaluation and fair management of remuneration for employees by considering the success of the work, attitude and potential of each employee individually. This includes providing welfare that is fair and appropriate to employees which is comparable to other leading companies in the same industry.

(3) Continually develop sufficient knowledge, skills, and expertise of staff at all levels in accordance with the suitability of duties and responsibilities of employees. This includes creating moral compass for employees.

(4) Manage systems in accordance with the international standards in terms of quality, safety, occupational health and environment. Maintain a good working environment so that employees are satisfied, have good hygiene, and their lives and property are safe.

(5) Listen to the opinions and suggestions from employees at all levels equally and equitably by having whistleblowing channels that employees can report inappropriate or misguided practices which includes protecting employees from harassment or being punished for making a complaint.

3) Treatment of Customers

The Company is committed to providing customers with good products and services, create maximum satisfaction in regards to both quality and fair price as well as continuously raising standards and maintaining good and sustainable relationships. The guidelines are as follows.

(1) Commitment to customer benefits and creating maximum satisfaction by offering good quality products and services and continually improving products and service quality.

(2) Disclose complete and accurate information about the products and services in order to provide customers with sufficient information to make a decision without exaggerating which causes customers to misunderstand.

(3) Determine the price of products and services at a fair rate. Do not make excess profits when being compared to the quality of products or services of the same type or category.

(4) Strictly comply with contracts, agreements or conditions with customers. If unable to comply, the customer must be notified in advance in order to jointly consider a solution which is based on the importance of correctness and the greatest customer satisfaction.

(5) Maintain customer confidentiality and do not use customer information for the personal gain and those involved.

(6) Develop products and services that are environmentally friendly by using less resources, saving energy, reusing and using resources that have a long product lifetime. This includes the production of safe products and services which are not harmful to the consumer health.

(7) Provide channels and procedures for customers to make complaints, request advice and make suggestions about the products and services of the Company.

4) Treatment of Partners

The Company complies with a competition framework that is trustworthy, honest, and provides benefits together with partners which are in accordance with the strict promises given to partners. The guidelines are as follows.

(1) Treat partners equitably, neutrally, and fairly based on fair remuneration for both parties.

(2) Strictly follow the contract or conditions agreed upon. If unable to comply with the conditions, partners must be notified in advance in order to jointly consider finding reasonable solutions to the problems.

(3) Do not request, accept or pay any dishonest benefits when trading with business partners.

(4) Maintain the confidentiality of business partners and do not use the information of trade partners for personal gain and those involved.

5) Treatment of Investors

The Company is determined to treat and cooperate with all investors fairly in order to achieve the objectives of joint ventures and for sustainable growth. The guidelines are as follows.

(1) Determine the business plan of joint ventures with investors. Together, support the exchange of ideas, suggestions and solutions in order to ensure that the operations of joint ventures are in accordance with the objectives and create the greatest benefits.

(2) Continually consider and review the operations of joint business ventures in order to achieve sustainable development and growth.

(3) Follow up and push the operations of joint ventures in order to comply with the legal framework and regulations related to business operations.

(4) Consider together with investors the allocation of benefits from the operations of joint ventures fairly and transparently. Do not take advantage of joint ventures by any means.

6) Treatment of Creditors

The Company abides by treating creditors with equality, fairness and transparency, as well as strictly complying with various conditions and contracts. The guidelines are as follows.

(1) Prepare, practice and maintain contracts with all types of creditors in accordance to the law with equality, fairness and transparency and not taking advantage of the parties.

(2) Do not use fraudulent methods or conceal any information or important facts that may cause damage to the creditors.

(3) Report the financial status to creditors in accordance with the terms in the contract with accuracy, completeness and transparency.

(4) Complete repayment of all types of loans and interest to all creditors on a timely basis.

7) Treatment of Society, the Community and the Environment

The Company adheres to responsibility to society, the community and the environment in regards to safety, quality of life and promoting energy efficiency. The guidelines are as follows.

(1) Realize the responsibility that should be given to society, the community and the environment as well as conducting business under environmental laws and regulations.

(2) Consider alternative ways to utilize natural resources without causing any impact on society, the community, the environment and people’s quality of life or cause the smallest impact possible.

(3) Promote activities that are beneficial to social, community and environmental development, especially communities that surround the Company's manufacturing.

(4) Support charitable foundations and organizations in order to help and provide opportunities for disadvantaged people in society to have a better life.

(5) Promote and support activities and projects aimed at improving the capacity and abilities of youth.

(6) Continually instill and promote employees at all levels to be conscious and responsible to society, the community and the environment.

8) Treatment of Government Agencies or Government Sectors

The Company pays attention to government agencies or government sectors both inside the country and in different countries that the Company makes investments in order to avoid inappropriate conduct as well as provide good cooperation in compliance with the requirements of government agencies or government sectors. The guidelines are as follows.

(1) Strictly comply with the law and relevant regulations. Always be aware that the laws, rules or traditions in each locality may have different conditions, procedures or practices.
(2) Proceed correctly with honestly when contacting government officials or agencies about transactions. Do not take any action that gives benefits or has unethical intentions with government officials.
(3) Accept opinions, suggestions or complaints from government agencies or government sectors.

9) Treatment of Trade Competitors

The Company treats competitors in accordance with the competition framework. The Company considers justice and ethics in trade and trade competition laws. The guidelines are as follows.

(1) Comply with the rules of free and fair competition as well as comply with relevant laws. Do not take advantage of competitors by unlawful means.
(2) Do not seek confidential information of competitors through dishonest or inappropriate methods. Do not take any action that violates the intellectual property of competitors.
(3) Do not destroy the reputation of business competitors by making false, damaging accusations.

Disclosure of Company Information

The Company adheres to the principles of fairness and transparency. As a result, the Company established an information disclosure policy in order to ensure that shareholders, investors, general public or stakeholders are confident in the Company's disclosure of information and that information is accurate, clear, consistent with the law, and equitable. The guidelines are as follows.

(1) Disclosure of material non-public information shall be disclosed in a careful, accurate, complete and timely manner. Ensure that shareholders or investors receive sufficient information equally and are able to access information easily.
(2) Disclosure of material public information shall be clearly disclosed to avoid confusion.

(3) Disclosure of non-material information shall be disclosed on the basis of reality without any intentions of creating misunderstandings regarding facts about the financial position, performance and stock prices.

(4) Disclosure of predictive information regarding the conditions, business direction which includes forward-looking information shall be disclosed with caution. The conditions or assumptions used in the forecast shall be explained.

(5) The Board of Directors, the Chairman, the Managing Director, and/or authorized persons by the Board of Directors, the Chairman, or Managing Director have the right to answer questions and provide important information that has not been disclosed to the public.

Non-Political Involvement

The Company has a policy to operate business in accordance with the law and political non-alignment. The guidelines are as follows.

(1) Remain strictly neutral and do not act in any way that contributes to one party.

(2) Do not allow political public relations or campaigns to get votes within the Company. This includes political activities that benefit one political party.

(3) Do not have a policy to give financial support, resources or other assets whether directly or indirectly to politicians, political parties or any political power groups.

(4) Encourage employees to exercise their rights to vote according to the constitution as a good citizen.

Anti-Corruption

The Company is committed to conducting business with honesty. Therefore, the Company has a policy to fight corruption in all forms and at every place where the Company conducts business. The Company strictly enforces this policy with directors, executives, all types of employee, mediators who contact subcontractor (or agents), and third parties that provide product distribution or any other service on behalf of the Company. The guidelines are as follows.

(1) Prohibit directors, executives and employees of the Company from conducting or accepting corruption in all forms, whether directly or indirectly. Even when the intention is to accept or maintain business services, no action can be taken.

(2) Strictly prohibit bribery with government officials, political parties, organizations in the form of government business enterprises, or other forms of companies that the government owns, whether directly or indirectly, through third parties. This includes officers of various companies and joint ventures that have government ownership or partial government ownership.

(3) Regularly and seriously review the operations as well as review the guidelines and procedures in order to comply with changes to business, regulations and legal requirements.

(4) Supervisors at all levels are required to communicate and help employees to understand about anti-corruption so that business operations under their responsibility and supervision will be done effectively. This is done by adhering to the practical guidelines in this Code of Conduct.

(5) All employees should not ignore or neglect when they witness corruption that involves the Company and its subsidiaries. They shall notify a supervisor or the person responsible and cooperate with the investigation of various facts.

(6) A person who acts corruptly commits unethical business operations of the Company and its subsidiaries, such a person must be considered for penalties in accordance with the Articles of Association of Company and its subsidiaries. This includes possible legal punishment if such actions are illegal.

(7) In the case that an employee may encounter a situation where they are threatened to make a payment in order to avoid physical abuse, which includes intimidation and threats to an employee's family of employees, this is considered a close threat that effect the health or safety of the employee and/or family of the employee. Therefore, it is necessary to have a "Payment for Safety" where the payment for this kind of safety is considered a special case. Employees must report this matter to a supervisor and/or the responsible person in Human Resource Management and Development as soon as possible.

Protection and Fairness to Whistleblowers or Reporting Corruptions or Non- Compliance with the Regulations and the Company's Articles of Association

The Company provides protection and fairness to all complainants, both inside and outside the Company. The guidelines are as follows.

1) Employees who witness actions that violate laws, regulations, the Company's Articles of Association, or work ethics as well as employees who have been harassed, threatened, or subjected to disciplinary action, are persons who have a right to file a complaint to any supervisor at any level that they trust and is responsible for Human Resource Management and Development. Outsiders have the right to file a complaint through the channels provided by the Company.

2) Complaints Channels.

(1) Employees can make a direct complaint verbally, in writing or through e- mail at hr_service@indexlivingmall.com or via phone at +662 898-6420-5 extension 2205 or at +662 417-1111 every Monday to Friday during the office hours of the Company.

(2) Outsiders can make a direct complaint verbally, in writing or through electronic mail at customer_service@indexlivingmall.com or via phone at +662 417-1111 or +662 898-6420-5 every Monday to Friday during the office hours of the Company.

(3) The complainant can file more than one complaint and the complainant does not need to disclose their identity.

(4) In the case that the complainant does not wish to disclose their name, they must specify sufficient, detailed facts or evidence to show that there is a reason to believe that an act violated the law, regulations or the Company's Articles of Association.

3) The complaint is considered a highly regarded confidentiality. The recipient of the complaint will keep the information confidential in order to prevent retaliation that may affect the complainant.

4) The Company established an investigation process to investigate and collect factual information regarding the reported matter as quickly as possible. If the reported matter is found to be true, the Company will consider appropriate and fair problem solving, protection, and alleviation of damage for the victims and relevant persons. If it is a significant matter which may affect the reputation, image, financial position, or business operations of the Company, such matters must be proposed to the Board of Directors, the Executive Committee and the Board of Directors as soon as possible.

5) Whistleblowers of Complainant Protection

(1) The complainant can choose not to reveal their identity, if that disclosure may cause damage to one's self. However, the complainant needs to specify sufficiently detailed facts or evidence that shows that there is a reason to believe that there was an act that violated the law, regulations and the Company's Articles of Association.

(2) However, if complainants choose to disclose their identity, the process will be able to proceed quickly and be able to notify complainants about the results of operations or additional details.

(3) The Company considers all relevant information to be confidential and will disclose as necessary by taking into account the safety and damage of the complainant, the source of information or related persons. The responsible person must keep this information at the highest level of confidentiality and not disclose it to others. If this is violated, this action is considered a disciplinary offense.

(4) The complainant will receive appropriate protection both during the investigation and after the investigation. In the case that the complainant sees that they may be unsafe, or damage may occur, the complainant can request the Company to determine appropriate protection measures or the Company may determine protection measures for the complainant without a request.

(5) The person who commits the offense must be subject to disciplinary action according to the Company's Articles of Association. If the action violates the law, they may be subject to legal penalties.

(6) Those who have suffered damage will receive relief through appropriate and fair procedures.

Employee Code of Conduct

Retail business is a business related to production, the sale of products and services for a variety of customers. Employees shall have the following Code of Conduct to follow as a guideline.

Personal Behavior

Employees have the right and freedom to behave in personal matters. However, some actions may affect the Company due to the position of the employee as well as their action. Thus, behavior that may affect the Company's reputation or image, or cause problems for the Company shall be avoided. For example:

1) Political Rights

(1) Employees have freedom of political rights such as voting or being a member of a political party. If an employee goes to help a political party on the election campaign, being a director of a political party, or being a representative of a political party in various public activities in which it is understood that that the Company is involved or in favor of that political party, employees should avoid actions.

(2) Employees must not use the Company's name, job position at the Company or the Company's budget or work hours to conduct political activities without permission from those in authority at the Company.

(3) Separate the involvement of political activities from the business of the Company by not wearing Company uniforms, showing Company symbols, or claiming any relationships with the Company in the expression of their political rights.

2) Conduct in Society

Employees shall comply with the rules, regulations and guidelines that are based on laws, ethics, culture, customs and basic values of the Company in order to maintain their honor and dignity, be respected in society, and maintain the good image of one's self and the Company at all times.

3) Use of Beneficial Information

Employees shall not seek personal gain or the benefits of others by using the information of the Company or causing others to understand that employees are using the Company's information for personal gain and/or cronyism.

4) Competition with the Company

In order not to conflict with benefits, employees should not conduct or invest in any competition or may be in competition with the business of the Company, whether directly or indirectly. Employees must not give help or advice to others who may damage or compete with the business of the Company or the Corporation, both domestically and internationally.

5) Purchasing Shares or Being a Partner in a Competing Business or Trade Partner

Employees may purchase shares or become a partner of a competing company or any business that competes with the Company or its trade partners. However, the following considerations must be considered.

(1) Employees must notify the Company if an employee holds shares or is a partner of a competitor or trade partner.

(2) It is improper and inappropriate for employees that have shares of competitors or trade partners to act or ignore actions that should be performed according to their duties with the Company. This is considered improper, inappropriate and should not be done.

6) Benefits and Involvement in Finances, Property, or Gifts with those who Do Business with the Company

(1) Employees shall not call for or accept money, property, gifts, or any other benefits from customers, contractors, vendors or from any other person who does business with the Company.

(2) Employees should not participate in joint investments, joint ventures, lending, giving loans, soliciting money, using checks, exchanging cash, leasing, trading, renting or creating any financial obligations with business operators, companies and various shops in order to request products or services without expenditures or at a special price. This may affect the use of discretion and decision making in regards to operations, unless it was authorized/approved by the Company.

7) Receiving Gifts from Operators who Do Business with the Company

If employees receive gifts or keepsakes from operators who do business with the Company that are worth more than how general people normally treat one another or is beyond the conditions that the Company requires, employees must report them to their ranking supervisors to display honesty, even if the employee

does not have any direct intentions. The employee must give such items to the Company to be used in employee activities.

8) Other Work Outside the Company

(1) Employees must fully devote themselves and their time to the Company's activities. In the case that employees are required to do other work in order to have more income or for other purposes, that job must have the following characteristics.

- Does not violate the law and is not contrary to public order or morality of people.
- Not in conflict with the interests of the Company, both directly and indirectly
- Does not damage the Company's reputation, image or business.
- Does not use Company secrets to find benefits.
- Does not affect the responsibilities of their own work.
- Promotes public relations for the Company or promotes work/develops the Company's systems.
- Does not take Company time to do other work that is not related to the Company for the benefit of one's self or benefit of others.

(2) Employees should notify the Company when it is necessary to work or do activities with any organization.

Code of Conduct Among Employees

1) Giving and Receiving Gifts

Although there is are traditions to give gifts to each other on various occasions, employees should avoid giving gifts to supervisors or receiving gifts from subordinates (which may be a channel for exploitation, create habits, or presume that one must continue such practices).

2) Personal Conduct and Treatment of Supervisors

Supervisors should behave in a manner that is respected by employees. Also, employees should not do anything that does not respect their supervisors, both to their face and behind their back.

Maintaining the Company's Assets

The Company's assets refer to all movable and immovable property which includes technology, academic knowledge, information, certificate of ownership, rights, copyrights, patents and inventions.

1) Employees have the duties and responsibilities to use Company assets to the fullest extent, take care of assets in order to keep them in good condition without losing them.

2) Not use Company assets without creating any benefit for the Company. Not use Company assets for the benefit of one's self or others. Employees shall not disclose non-public information.

Company Confidentiality

Confidential information refers to information that the Company keeps confidential and is valuable to the Company. This includes product designs, drawings, blueprints, records and other materials, documents or records that are specific assets of the Company, research information, production processes, material lists, finances, accounting, sales, personnel management, operations, information related specifically to the list of customers, partners, price lists, customer service requirements, service and equipment costs, pricing and maintenance costs of equipment. This also includes knowledge of employees or knowledge that the Company provides to employees while working with the Company or any information that affects the Company's operations regardless of the form of information.

1) Employees will not act or take part in the disclosure or allow any other person to disclose any confidential information of the Company or related to the Company, unless it was approved by those in authority at the Company.

2) Employees must not use confidential information for personal gain or cronyism.

3) After the employment conditions end, employees shall not use or shall not disclose any "Company Confidential Information" whether it is commercial confidential information or trade confidential information related to the Company, agent, or customers of the Company which the employee oversees or may oversee (but this is not a general definition of the above). This includes commercial secrets or confidential information or trade secrets related to the business, such as:

(1) Customers or prospective information which includes trade partners, sellers or suppliers of the Company.
(2) The name, address and telephone number of individuals that the Company contacts.
(3) The time and conditions of auctioning, bidding, or drafting Company contracts with third parties.
(4) Price policies, marketing strategies, product strategies and operational methods.
(5) Technical information.
(6) Budgets and other financial information of the Company and affiliated companies.
(7) Management policies and business strategies.

Conflicts of Interest

1) Employees shall not act or participate in any actions to obtain a conflict of interest or to create a conflict of

interest with the Company. Not seek benefits from their position to plan or acquire a stake that is conducive to one's self or other people.

2) Employees shall be aware that spouses, family members or relatives of employees who work for competitors or do business with the Company may utilize the Company's confidential information acquired from employees and negatively affect the benefits of the Company.

3) Employees shall be aware that spouses, family members or relatives of employees who are employees of the Company may cause a conflict of interest in the following cases:

(1) An employee is the supervisor or the subordinate of the spouse, family member, or relative of the employee.

(2) An employee works in a department/division or have a position in any department that can provide benefits or privileges to spouses, family members or relatives of the employee.

(3) An employee has a sexual affair with another employee, regardless of their level or position, may provide benefits to one another or cause a scandal in regards to the accuracy, transparency or fairness of the performance of either party. Sexual affairs include male-female, male-male and female-female.

4) The Company's policy to prevent conflicts of interest are as follows.

(1) Employees who are spouses or are having a sexual relationship shall not work in the same department or different departments, but in a position of duty, level of job or have a job description that benefits each other or may cause an opportunity to have a conflict of interest, cause problems, rumors of transparency or fairness, such as supervisors-subordinates, procurement department-purchasing department.

(2) Employees, family members, or close person of the employee are prohibited from conducting business or providing services to the Company if the employee has a stake or has the authority or duties related to the selection of partners/products/services, such as

- Employees shall not inquire the price or purchase products/services/ or select trade partners who are family members or a close related person.
- Employees shall not select products/services from companies or individuals who are family members, relatives or a close person of the employee who is a stakeholder or involved.

5) The Company requires that personnel operations such as relocation, transfer, promotion and appointment/reappointment must have no conflict of interest. This is the responsibility of each supervisor and the Human Resource Department to inspect and act in accordance with the Company's policy.

The Company may change, amend, and add to the Human Resource Management and Development Code of Conduct as it deems appropriate.

Cancelation Documents

Any records, announcements and manuals that have related messages or are in conflict with this Code of Conduct that had been announced to comply shall be canceled and use this Human Resource Management and Development Code of Conduct instead.

Approval Authority

In case of necessity, the highest level of senior executive in the Human Resource Management and Development Department has the authority to interpret this Human Resource Management and Development Code of Conduct.

(1) Changes or modifications to some part or the entire Human Resource Management and Development Code of Conduct are at the discretion of the Management.

Procedures

Every employee has the duty to provide information in accordance with the conflict of interest report form (FM-HR-CB-016) in order to display honesty and transparency for the verification of information or notify the activities of employees that may not be consistent with the work regulations in regards to work ethics. Employees shall fill in information when they are a new employee, when information changes, and when it is the first time of notification.

(1) All employees shall strictly comply with this Code of Conduct and sign their name in writing according to the conflict of interest report form (FM-HR-CB-016) which was specified by the Company.
(2) Employees at a supervisory level and management level are responsible for supervising the operational level staff to follow this code of conduct correctly and strictly.
(3) Supervisors at all levels and the personnel department are responsible for providing counsel and advice to employees in case there are any doubts or uncertainties.
(4) The Human Resources Department is responsible for collecting the conflict of interest report form (FM-HR-CB-016) and keep it in the employee's profile or employee's history database.

(5) In the case that this Code of Conduct is improved/revised/modified, the Compensation and Benefit Department (C&B) and the Human Resources Branch have the duty to communicate it to employees along with a signature acknowledging the information is in accordance with this Code of Conduct.

(6) If the Company finds that employees intentionally withheld information or displayed incomplete, inaccurate information in the form prescribed by the Company, the Company may believe that the employee gave false information or withheld information that may adversely affect the Company.

(7) The Company may consider transferring employees to work in other positions or departments in order to prevent conflicts or conflict of interest as it deems appropriate.