



Announcement No. 116/2021

Code of Conduct of the Company

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Crown Seal Public Company Limited ("the Company") is committed to conducting business with adherence to the principle of integrity and responsibility to all groups of stakeholders in accordance with the principle of good corporate governance. In 2011, the Company has made Code of Conduct of the Company. By adhering to the code of conduct of Toyo Seikan Company Limited as a main principle, apply additionally according to the international standard guidelines and good business practices to be most suitable for the Company's business operations as a guideline for the performance of all employees and there are the Company's directors behave as role models.

In order to establish clear practical guidelines in carrying out the business operations and developing the Company into a sustainable body, we therefore reviewed this "Code of Conduct" that has been announced. To be a practice guideline clearly for business operations and organization sustainable development. It will help drive the operations of the Company being fair, honest, transparent and in accordance with the principles of good corporate governance. To lead to be a good corporate governance and has been accepted by shareholders, customers and related parties and create sustainability in the future.

The Company fully wishes that this Code of Conduct would cooperatively be adhered to by its directors, management and employees as well as its stakeholders in order to give rise to the perpetual sustainability. This Policy is revised in accordance with the resolution of the Board of Directors Meeting on 10 August 2021, and has been put into force as of and from 11 August 2021.

Notification made to inform all concerned to adhere to as the practical guidelines for common practice.

Announced on 10 August 2021

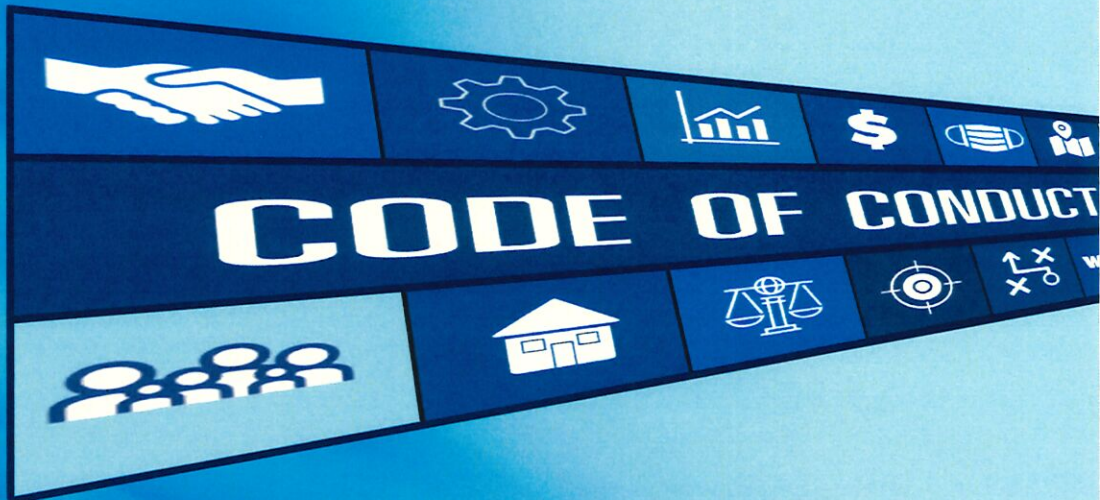
(Mr. Dhep Vongvanich)

Chairman of the Board of Director

Crown Seal Public Company Limited

PRODUCTIVITY
ENERGY
MANAGEMENT
GREEN
BIO-PLASTIC
ENVIRONMENT
ECO-FRIENDLY
CODE OF CONDUCT

PRODUCTIVITY
SAFETY
HYGIENE
CONCERN
OF COMMUNITY
FIRST
CUSTOMER
EMPLOYEE
VALUE
FIRST
EMPLOYEE
SMART
ENERGY
GREEN
ENERGY
SMART
SOCIAL
RESPONSIBILITY
QUALITY



จรรยาบรรณ
บริษัท ฝาจีบ จำกัด (มหาชน)



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Message from Board of Directors Chairman:

The Company Board of Directors adheres to the Principle of Integrity in carrying out the business operations and is responsible to all groups of stakeholders by placing the emphasis on the fairness, honesty, transparency and complying with the Principle of Good Corporate Governance in order to lead the organization to become a good governance body acceptable to shareholders, customers and related parties.

In preparing this “Crown Seal Public Company Limited Code of Conduct,” the Board of Directors has adopted the Toyo Seikan Co., Ltd., Group Code of Conduct for use as a key guideline with additional applications in accordance with the international standard guidelines and a good business practice of business organizations to be most suitable for the Company’s business operations.

The Company Board of Directors is hopeful that this Code of Conduct Handbook would be a practical guideline for all employees in performing their duties with the Company’s directors’ behaving themselves to exemplify a good model. The Employees are committable and sincere in adopting the Code of Conduct for use in their duty performances in order to develop and preserve this Code of Conduct of Crown Seal Public Company Limited to remain all along with the Company and further continue to be the working culture of all employees.



Mr. Dhep Vongvanich

Chairman of the Board of Director

Crown Seal Public Company Limited

August 11, 2021

Definition:

The Crown Seal Public Company Limited Code of Conduct means a good business practice guideline in carrying out the business operations of Crown Seal Public Company Limited, hereinafter referred to as the “**Code of Conduct**.”

The Company means Crown Seal Public Company Limited.

Director means a director of Crown Seal Public Company Limited.

Employee means a person in the management capacity, a permanent employee, an outsourcing labor, a temporary contract worker, a special contract worker.

Contractor means a party entering into a Hire of Work Contract with the Company in the sense of the law.

Business-related Person means any person or juristic person with whom the Company has a business relationship whether it is a government, a state agency and enterprise, a private organization and public charitable organization, etc.

Conflict of Interest means any act of the directors, management and employees that may be involved with personal benefits or benefits of related persons, whether by blood or any other way, to influence the decision making or duty performances which affect the interests of the Company.

Bribery means an offering to give money, assets, rewards or any other benefits to people involved in business with the Company to induce such person to do something dishonest, illegal, or unethical.

Misconduct means a personal exploitation, which is against the duties and law, of directors, the management and employees of the Company, the Company's customers and business partners or the Company's counterparties: such as; a falsification of report both in the financial and non-financial reports, making false financial evidence, taking Company's property for personal use, misappropriation, embezzlement and cheating, etc.

Corruption means a bribery in any form by offering to give, pledging to give, giving, promising to give, demanding or accepting money, asset or any other benefit, to a government official, government agency, private agency or those having duties, whether directly or indirectly, in order to persuade such persons to perform or omit to perform their duties so that the business can be acquired or maintained or recommended to the Company, in particular, or that any other benefit which is unsuitable for the business interest can be acquired or maintained except in the case that the laws, regulations, announcements, regulations, local customs or trade customs are permissible.

Practical Guidelines of Code of Conduct Crown Seal Public Company Limited

1. Persons having duty to comply with the Code of Conduct:

All employees and management personnel of Crown Seal Public Company Limited with the Company's directors' behaving themselves to exemplify a good model.

2. Instructions on Code of Conduct:

1. Get to understand the contents of this Code.
2. Regularly review the knowledge and understanding on the contents of this Code.
3. Provide knowledge and understanding to other people who have to perform duties related to or may affect the Company.
4. When in doubt or having questions, consult with your Supervisor or Human Resources Manager or the Company Secretary Office Manager.
5. Notify your supervisor or Human Resource Manager or the Company Secretary Office Manager when coming across any violations or non-compliance with the Code of Conduct
6. Cooperate in the investigation of facts with the organizations or persons assigned by the Company.
7. Supervisors at all levels must be the leader in complying with the Code of Conduct as well as enhancing matter on the aspect of the working environment in order to get the employees and related persons to understand that the compliance with the Code of Conduct is a proper thing and must be practiced.

3. Code of Conduct Violation or Non-compliance Reporting:

A person coming across a violation of or non-compliance with the Code of Conduct can make an inquiry about it or submit a complaint as follows:

- 3.1 Directly sent information to the following persons:
 1. Supervisor in whom they have trust
 2. Human Resources Manager
 3. Secretary to the Board of Directors
 4. Independent Director or Audit Committee
- 3.2 Send electronic (E-mail) to companysecretary@crownsal.co.th
- 3.3 Send by post to the Company Secretary: Crown Seal Public Company limited 5 Soi Rangsit-Nakornnayok 46 Prachatipat, Tanyaburi, Pathumthani 12130
Tel: 02-533-0450 Ext. 638 Fax: 02-974-1118
- 3.4 To Complaint and Whistleblowing Receiving System on the Company's website or QR Code
- 3.5 To Complaint Cabinet in front of the employees dining room, 2nd floor, Crown Seal Public Company Limited.
- 3.6 In the event of coming across the issue that needs to be reported urgently, it shall be reported directly to the Company Secretary immediately for reporting onto the President and the Board of Directors forthwith.

4. Action Process when Receiving a Complaint:

- 4.1 The complaint receiver shall gather and compile the facts related to the violation or non-compliance with such Code of Conduct by own self or notify the HR Manager to take actions.
- 4.2 The person taking actions under 4.1 shall proceed with the investigation into the facts, process and screen information to consider as to what would be the suitable steps and procedure to tackle problem on each matter for submission onto the Committee for Ethics to determine measures to put an end to the violation or non-compliance with the Code of Conduct.
- 4.3 Complaint receiver has a duty to report the action result to the complainant if the complainant should reveal himself/herself. In case that it is an important, the result shall be reported to the Board Chairman and/or the Board of Directors of the Company to be aware of.

5. Protection and Damage Mitigation Measures for informants, complainants or persons providing co-operations in reporting the violations or non-compliance with the Code of Conduct:

- 5.1 Informants, complainants or persons providing co-operations on the investigation into the facts shall be protected and fairly treated which, in this respect, the Company considers the information in connection therewith to be a confidential information and shall be disclosed only as necessary by taking into account the security and damage that could occur to the informants, source of the information or related persons.
- 5.2 In the event which a complainant thinks that his/her security may be in jeopardy or that he/she may suffer a damage, he/she can request the Company to determine appropriate protection measures
- 5.3 Persons suffering damage will be alleviated by appropriate and fair process.

6. The acts within the scope of being unethical:

The Company considers the Code of Conduct and the Code of Practice as a discipline which all employees and the management must strictly observe. A violation or non-compliance is considered a breach of the discipline under the Personnel Administration Regulations which may also be punished by law if such act is against the law. All employees and management have the duty to comply with and encourage others to follow the Code of Conduct. The following acts shall be considered a violation of the Code of Conduct:

- 6.1 Failure to comply with the Code of Conduct.
- 6.2 Recommending, encouraging or instigating others not to comply with the Code of Conduct and Code of Practice.
- 6.3 Neglecting or ignoring when coming across a violation or non-compliance with the Code of Conduct in the case that they have known or should have known because such violation or non-compliance is related to the work under their responsibilities.
- 6.4 Not cooperating or obstructing the investigations on the fact-finding.
- 6.5 Unfair acts against complainants because of reporting the non-compliance with the Code of Conduct.

7. Monitoring controls to ensure the compliance with the Code of Conduct:

The Company defined this matter to be the duties and responsibilities of all Company's directors, management and employees to mandatorily be aware of, get to understand and strictly comply with this Code; not merely a voluntary act and cannot purportedly cite that they have not been aware of these established practical guidelines.

The management in the Company shall monitor control and oversee together with taking responsibility for carrying out actions to ensure their subordinates to be aware of, get to understand and intensively comply with the Company Code of Conduct.

Good practice

1. Human Right and Labor.

1.1 Right, Freedom and Equality:

The Company respects the human rights and the individual by recognizing the rights in being humans and equality without any discrimination against any person. In addition, the personal freedom must be protected from being violated from using and disclosing to unrelated persons.

Practical Guidelines:

1. The Company shall respect human rights without making any unfair discrimination due to the differences in race, nationality, belief, religion, sex, age, education or social class.
2. The Company respects the individual as well as trying to get to rightfully understand the attitude of such persons.
3. The Company shall strictly comply with the Principle of International Human Rights and refrain from supporting the activities that violate the Principle of International Human Rights.
4. The Company shall take care of the working environment to always be safe and hygienic to the employees.
5. The employees must treat each other with respect and honor; should avoid criticizing others which may cause damage to such persons or the Company as well as listening to the opinions and suggestions of the other persons without bias including listening to the opinions and recommendations from others without bias, but, with rationale.
6. The employees must not cause any trouble or nuisance in a manner likely to interfere with the operations including sexual harassment and assault against others. When coming across any oppression or

unjust act, a complaint shall be lodged according to the prescribed steps of the procedure and process.

1.2 Political Actions:

The Company is politically neutral without performing any act in a favorable manner to concentrate on or support any political party or any person with political power and recognizes and respects the right and freedom in the exercise of the political right of each employee.

Practical Guidelines:

1. Employees shall avoid to express their opinions on politics in their workplace or during their working hours which may cause a conflict of ideology.
2. The Company shall encourage the employees to exercise their political rights by their own resources, but they are not allowed to take the resources, capital and reputation of the Company for use in carrying out any political activities.
3. Shall refrain from dressing in the employees' uniforms or using any symbols that will make others understand that they are employees of the Company when participating in a political meeting or gathering in any public place of a political nature.

1.3 Personal Data:

The Company respects the privacy rights of related persons, thus, personal data of the employees and persons related to the business operations: such as; personal status, biography, work history financial data, contacting information, health information, or other personal data, must be protected from being used, disclosed or transferred to other persons in a manner likely to be in violation of their statutory rights.

Practical Guidelines:

1. All employee must respect personal data of the other persons which in the event that such personal data will be used, disclosed or transferred, the consent of such person must be obtained and the use must not violate their statutory rights.
2. The person responsible for keeping data under his possession or care of the Company must protect personal data of the employees and those involved in business operations. Therefore, the use, disclosure or transfer of personal data of the employees and related parties shall be done insofar as it is necessary according to the normal clause of his duty performances and must not violate their statutory rights.

1.4 Labor:

The Company realizes the importance of labor by treating the employees fairly in accordance with Labor Law and Regulations related to labor.

Practical Guidelines:

1. Equally treat employees in all processes of employments beginning from the recruitments, payments of compensations, remunerations for working hours and working on holidays work assignments, performance evaluations, trainings and developments, progress planning, and others without any discrimination.
2. Refrain from using forced labor, labor from human trafficking or child labor which is unlawful including punishments which are physically or mentally tortures against the employees no matter what it is by way of an intimidation, a confinement, threatening, wrongful act or a use of violence in any form.

2. Environment, Health and Safety.

The Company is well aware that environmental protection is an importantly common task, thus, effort will therefore be exerted to map out the policy on the aspect of the environment to be all along with its policy in every respect and strive to create the workplace a safe, hygienic and always a lively workplace which, in this regard, the employees and related parties have the obligatory duties to follow the Practical Guidelines in various matters as specified.

Practical Guidelines:

1. The Company will strictly comply with the laws, policies, regulations and environmental standards related to safety and hygiene.
2. The Company will set standards to intensely monitor control over and conduct the environmental conservation activities in order that the Company's activities in all fields can be carried out with good planning and efficiency.
3. Employees must be cooperative in carrying out operations in accordance with the established standards to help prevent and reduce environmental, health and safety impacts that may occur to the lives of employees and the Company's assets.
4. Employees must come to a helping hand in looking after and using the natural resources, materials or equipment's efficiently and effectively.
5. Encourage the instilling of consciousness in and the development of employees at all levels to be aware of its importance and continued compliances with the environmental, health and safety standards.
6. Support and provide appropriate environmental management assistance to stakeholders. especially the communities surrounding the Company's business establishments.
7. Employees must take care and check the health readiness of their owns, their co-workers, business partners and other related persons before working and that the work must be stopped or ordered to stopped immediately the health of any of them should be found not to be ready for working in order to reduce the risk of accidents at work or related thereto.
8. Assess the risk before starting work including the study of various data about unsafe or potentially dangerous working conditions in order to plan or prepare for the appropriate protection.
9. In case of a dangerous assignment or if it is not sure on working safety, the work should be stopped or delayed and consulted with supervisor or specialists immediately
10. Report to supervisor immediately when coming across any abnormality from the machines, equipment's and places in the working area that may affect health and safety.
11. Supervisors have direct responsibility for safety at work; must define or publish guidelines for preventing and controlling accidents from occurring including employees' health care according to the job risk.

3. Sustainable relationships with customers, consumers, partners, government, communities and societies.

3.1 Customer and consumer treatments:

The Company is committed to creating customers' satisfactions by improving the quality of products and services to continuously meet their needs as well as manufacturing safe products and taking the responsibility of the customers and consumers

Practical Guidelines:

1. In manufacturing products and providing services, the Company attaches great importance to the safety and hygiene of the customers and consumers using the Company's products.
2. The Company will deliver products and provide quality services that meet the needs or higher than the customers' expectations at the reasonable prices.
3. Provide accurate and sufficient information to customers without exaggerating or refrain from doing anything deceptive or misleading the customers to believe in the quality of the Company's products and services. Provide a system and process for customers to make complaints about the product quality and safety and services that are ready to expeditiously respond to customers.
4. Strictly comply with the conditions having with the customers. In the event that any conditions cannot be complied with, an immediate notification must be made to the customers to find solutions together.
5. Maintain the customers' confidentiality and must refrain from illegally using it for personal benefits or benefits of related persons.

3.2 Procurement and partner treatments:

The procurement must be carried on in accordance with the established procedures to create transparency, verifiability and bring about the best interest to the Company. In this respect, the Company's partners must equally be treated on the basis of a fair competition and respects to each other.

Practical Guidelines:

1. In making the procurement, the actions thereof must strictly be carried on in accordance with the procedures set forth under the procurement regulations and in line with the authority to carry out actions.
2. The Company personnel when desiring to do any procurement must take into account the needs, worthiness, price, quality and service to be received, and that the information is provided to partners equally without any discrimination and fair competition between all partners is created.
3. Negotiations must be transparent; no benefit from the procurement must be received, shall place own self neutrally without having close associate with any partner to the extent of resulting in the partner to have influence in the decision making.
4. Must refrain from getting involved in the procurement process, from pairing a partner having associate with own self: such as; being his family, close relatives, or the business owned by him or of which he is a partner.
5. Must refrain from using information acquired from the procurement for personal benefit or benefits of the others illegally.

6. Strictly comply with the conditions agreed upon. When any partner has been found to be unable to comply with any of the conditions, a pertinent report must be made to the supervisor to seek advice and further find solutions to solve the problem.

3.3 Transactions with the government and respects to the law:

In conducting transactions with the government, the Company must avoid an act in a manner likely to possibly incentivize the government or government officials to act improperly or inappropriately. However, good relationships with the government organizations or agencies shall always be maintained as well as paying respects and complying with the laws and customs of each locality.

Practical Guidelines:

1. The Company shall carry out its business operations with transparency, accuracy and straightforwardness in dealing with the officials or organizations/agencies of the government as well as maintaining good relations between each other within the appropriate scope.
2. The Company shall respect and strictly abide by the laws and regulations, both domestic and international, by taking into account the customs and traditions of each region that are different from one another

3.4 The overall community and social responsibilities:

The Company shall carry out its business operations with responsibilities and shall be aware of the overall potential community and social impacts as well as providing supports to the public interest activities that help strengthen the community and society.

Practical Guidelines:

1. The Company is committed to taking care of and preventing the Company's operations to be negatively affected and to cause damage to the community and society.
2. Regularly promote activities that are beneficial to the community and society by taking into account the benefits that the public will truly receive.
3. Instill consciousness in employees at all levels to have social responsibility, seriously and continuously.

4. Disclosure, communication, safeguarding and use of the Company's information.

The Company considers the matter of safeguarding the important information and secrets of its own and its partners and customers to be the responsibilities of its directors, management and employees with strict executions, especially, the internal information which has not yet been publicly released or the information which has affected the Company's business operations or share prices.

Practical Guidelines:

1. Must not take advantage or information acquired from performing duties for use in personal exploitation and doing business in competition with or related to those of the Company.
2. Must not disclose the information having not yet been disclosed to the public and must not use the internal information for personal exploitation in trading the Company's shares or providing internal information to others for the benefit in trading the Company's shares.
3. Must not take the Company's internal information including documents and information on the computer out of the Company without the Company's and supervisor's authorization.
4. Must not disclose the Company's confidential business or intellectual property information or cause it to be leaked to unrelated persons and other companies, especially, the competitors even after the status of being the Company's director, management or employee has been terminated.
5. Must not use the Company's intellectual property for reproductions, modifications, or any actions for personal benefit or benefit of the others without the Company's authorization.

6. Respect and refrain from infringing the intellectual property of the others. Check work achievements which are of the third party's rights having been acquired or will be used with the Company as well as entering into any contract or juristic act that the matter in relation to the intellectual property right should clearly be agree upon.
7. Must keep information of trade partners, customers and trade information in confidence and must not disclose it to unrelated Company's personnel and third parties unless otherwise it is required by law to be disclosed or has been authorized by the Company.

5. Conflict of Interest.

The Company considers it an important policy not to allow the directors, management and employees to take advantage from being it directors, management or employees for personal exploitation and must try to avoid any conflict of interest that may affect the decision-making provided, however that their performances of duties must be adhered to the Company's interest under the legality and ethics.

Practical Guidelines:

1. The Company is in the wholly common society, thus, it is mandatory that it properly complies with the laws and regulations existing in the Company and must separate the common matter and private matter from one another.
2. Avoid entering into transactions related to own self that may cause a conflict of interest with the Company.
3. In the event that such transactions are necessary for the benefit of the Company, they shall be undertaken as if they are transactions undertaken with the third parties. Provided, however, that the stakeholders in such transactions must not take part in the decision-making.
4. In the case of a participation in or being a shareholder of a business that competes with that of the Company or any business that may cause a conflict of interest with the Company, a notification accordingly must be made to the Company.
5. Must not exploit benefits from the information and anything acquired from the performances of duties.

6. In the case of holding any position in the other company or business organization, it must not cause any conflict of interest with the Company, and the performances of duties in the Company directly. In this respect, a notification accordingly must be made to the top management.
7. The Company's employees shall avoid being engaged with the jobs, other than those of the Company, which may affect the jobs under their responsibilities

6. Responsibility to the Company and the Company's assets.

6.1 Protection of Company Assets:

The Company has focused on instilling consciousness in the management and employees to most efficiently use the Company's resources and assets: such as; office equipment, tools, machineries, technology, academic knowledge, etc. , including taking care of them from loss or being used for exploiting personal benefits or benefits of the others.

Practical Guidelines:

1. Must use the Company's assets and resources economically and for maximum benefit.
2. Must help each other to prevent any Company's assets from being depreciated, damaged or lost. When damaged, a notification accordingly must expeditiously have been made to the responsible unit to repair.
3. Must not use the Company's equipment or items for personal benefits and benefits of the others.

6.2 Recording, reporting and safeguarding of information:

All employees have the duties to mandatorily carry out actions to ensure full and safe availability of the information for which they are responsible and have used in carrying out the operations and can be used for reference or utilizations with the Company when required. Provided, however, that the information recording and reporting must properly and accurately be done in accordance with the relevant standard and requirement.

Practical Guidelines:

1. Must record and prepare information and reports, accurately and factually, and in accordance with the law and prescribed standard.
2. Must maintain complete information as prescribed by law and that such information can be used as a reference and is useful to the Company. Provided, however, that it must cautiously be stored for convenience in making use of it.
3. Actions on the important documents and confidential information must be undertaken in a manner suitable for the type of the information.
4. Respective to the financial statements reporting and report on any matters which are required to be forwarded to the external agencies and the government organizations, the related employees must exercise extreme carefulness in preparing them and ensure the availability of the complete and accurate data.

6.3 Use of computers and information technology:

Computers and other electronic data or information technology are deemed to be the Company's properties available provided for use to increase the business operations, thus, the employees must use them accordingly and comply with the policy and regulations on the use of the information technology set forth by the Company, including refraining from disseminating them without any permission.

Practical Guidelines:

1. Use computers and information technology which are considered the properties of the Company for the benefit of the Company only, not for personal benefit.

2. Keep, and do not allow unrelated others to use, the password to gain access into the Company's information system.
3. Must not disclose information contained in the Company's information system without permission from high level supervisor.
4. Neither use unlawful software nor make copies of copyrighted software regardless of whatever the reason without the permission the Company and the manufacturer of such software.
5. No Company's email address shall be used in a manner likely to be in violation of personal rights or against the law, or in forwarding a slandering message eventually causing impairment, or vulgar, obscene, intimidating or annoying messages, to others.
6. Internet shall be used for seeking information and knowledge being useful for performing duties and that using it for downloading games or in a way which is against the law, or in a manner to be obscene or in violation of good morals, shall be prohibited.
7. Employees must provide co-operations and facilitations to persons being assigned by the Company to check the functions of the Company's computers and information technology.

7. Accepting or giving assets or any other benefits.

7.1 Accepting or giving assets or any other benefits that may affect the decision making:

The Company's business operations must be carried out, properly, straightforwardly and must be free of making a demand for or an acceptance of any assets and benefits from business-related persons including absolutely refraining from encouraging the giving of bribes.

Practical Guidelines:

1. Must refrain from demanding or accepting any money, assets, things and benefits from business partners, contractors and those with whom the Company has run the business.
2. Must not offer any benefits to government officials, customers, trade unions, or any other third party in order to induce them to misconduct.
3. A business entertainment and an expense directly related to the Company's business operations, which are reasonable, can be done, but, any attribute beyond the norm from the person with whom the Company has run business, should be avoided.

7.2 Accepting or giving gifts or souvenirs:

Accepting and giving things as gifts or souvenirs according to the customs and traditions to express gratitude, congratulation or concern are deemed to be the matters which the Company's employees can practice, but, they must bear in mind and be careful not to accept or give gifts or souvenirs with the value beyond a range of the normal practice, to the person with whom the Company has run business.

Practical Guidelines:

1. Should avoid giving or accepting any gifts from business partners or persons with whom the Company has run business, except in the festive season time provided, however, that they must be of a reasonable value and not be related to nor bound by the business obligations.
2. Must refrain from accepting or giving any gifts or souvenirs that may affect any decision to be unfair in the performances of duties. In the case where it is necessarily required to accept or give gifts or souvenirs with the value beyond the norm to the person with whom the Company has run the business, a report accordingly shall be made to the supervisor.
3. In the case of being assigned to welcome visitors for a visit to the Company's various fields of business or being authorized to help in doing the jobs out of the Company, the assigned person may accept the items or gifts from such organization in accordance with the standards set forth by that organization.

8. Trade Competition.

The Company will compete in trades with impartiality, by taking into account the trading ethics and competition laws in foreign countries in which the Company has run the business, with both its customers and business partners and refrain from distorting, deceiving, or using any other improper means in carrying out the business. In the event that it is necessary to cooperate with trading competitors, it must be in a manner of transparency and must not enter into any unlawful agreements.

Practical Guidelines:

1. The Company shall carry out its business on the platform of free competitions by take into account the fair competitions without entering into any agreements with competitors or any person in a manner of reducing or limiting the trade competitions.
2. Must refrain from seeking confidential information of competitors in a dishonest or an unlawful means, from causing damage to the reputation of competitors by making accusations with groundless facts.
3. Must refrain from damaging the reputation of competitors by making allegations with groundless facts.
4. Study and get to fully understand the competition and antitrust laws as well as complying with the laws relating to trade competition in other countries in which the Company has run the business and shall refrain from showing the antitrade competitive behavior.

9. Overseas Business Operations and International Trades.

9.1 Overseas business operations:

On the business operations in foreign countries whether in establishing the companies, factories, offices, branches, agents, trade transactions with the distributors or the business acquisitions, proper compliances with related internal law of such particular country in which the Country has invested and behaving oneself in becoming a good citizen in each locality must be taken into account. In addition, the environments, customs, traditions and cultures of each locality must be taken into account, as well.

Practical Guidelines:

1. Operate the business completely and fully in accordance with the domestic laws of the country in which the Company has carried out the operations. Provided, however, that in the event where the Company has a higher class of or better practical guidelines, rules and procedural steps than those prescribed by law, the Company shall proceed with the actions in accordance with the Company's prescribed practical guidelines, rules and procedural steps.
2. Refuse to take any action which is at risk to constitute an offence under the local law and if the carrying out of the action is viewed to be unclear, non-conformance to or possibly contradictory to or inconsistent with the law or customs, traditions, and cultures in each locality, a report accordingly must be made to the supervisor or consultations made with the Company's legal advisor.
3. Regularly keep track of the changes in the laws or rules in each country in which the Company has run the business. If unsure, seek the advices from the Company's legal advisor or related persons.

9.2 International Trades:

The Company's any foreign-related country goods imports-exports or any transactions must strictly be complied with the relevant laws: such as; the Import and Export Law, Customs Law, Product Safety Law, Consumer Protection Law, including the rules and practical guidelines of the Company.

1. Study and monitor follow-ups on the information of customers and business partners with whom the Company has run business by avoiding to do business with the customers or partners who do not comply with the related applicable laws or conduct the business in a manner of dishonesty.
2. Regularly keep track of and verifying various transactions having occurred to ensure proper compliances with the law.
3. Report information together with the evidence regarding the import or export, to the person responsible for the import or export: such as; the Company's internal department or the government agencies, etc. , by ensuring that it is evidence bearing the accurate information.

10. Anti-Money Laundering.

The Company adheres to the Rule and Law related to Money Laundering, that is to say, the Company will not accept the transfers of or make changes in the conditions of the assets or encourage to accept the transfers of or changes in the conditions of various assets undertaken in relation to the commission of an offence in order to prevent anyone from using the Company as a channel or a tool to transfer, conceal or disguise the source of the illegally acquired property.

Practical Guidelines:

1. The Company will strictly comply with the laws and regulations regarding anti-money laundering.
2. Avoid to take money from a transaction or get involved in a transaction in connection with money, which is implied in an illegal manner or risk the law.
3. Before entering into a transaction with a counterparty, make sure that the source of the money is legitimate.
4. Must not transfer money to unknown accounts or accept money transfers with an unusual nature of disbursement, especially, from country that is not involved in such transaction.
5. In the event of coming across an unusual transaction, it must be reported to the supervisor immediately.

11. Anti-Corruption.

The Company will conduct its business properly, straightforwardly, transparently, honestly, verifiably without any misconduct or corruption by complying with the relevant laws and the Company's Anti-Corruption Policy including refraining from causing the rising of any accusation or impairment to the Company's reputation.

Practical Guidelines:

1. The Board of Directors, management and employees of Crown Seal Public Company Limited at all levels must comply with the Anti-Corruption Policy and the Company Code of Conduct without getting involved in any corruption, whether directly or indirectly.
2. All Company's employees must not remain failed or neglected. When coming across any act that is deemed to be a misconduct or corruption in relation to the Company, they must notify their supervisors or responsible persons accordingly through various channels designated by the Company.
3. The Company will provide fairness and protection to employees who refuse to act in a manner likely to be a misconduct or corruption or report a misconduct or corruption related to the Company, with the measures to protect the complainants or those being cooperative in reporting the misconduct or corruption according to the Company's determination. There will be no actions on demotion, punishment, or negative consequences upon the employees who deny the corruption practice.

4. Board of Directors, management and employees at all levels who commit an act of misconduct or corruption shall be considered to commit an offence against the Company's Regulations and Ethics which shall be subject to the disciplinary actions and consequent penalties according to the regulations set forth by the Company and could possibly be punished under the law if such act is against the law.
5. The Company realizes the importance of disseminating, providing knowledge and getting to understanding with the other people who have to perform duties related to the Company, on the matter that they have to comply with the Anti-Corruption policy, as well.

Action Process when Receiving a Complaint

