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Notification of IRPC Public Company Limited

at Por Tor 004/2021

Policies and Guidelines on Corporate Compliance
of IRPC Public Company Limited and Subsidiaries (IRPC Group)

IRPC Public Company Limited and subsidiaries (IRPC Group), "IRPC" or "the Company", have operated an integrated petrochemical business, coupled with infrastructure business which support the business operations of deep-sea port, tank farm and power plant. The Company has consistently emphasized on the management to ensure that the business operation complies with relevant laws, rules and regulations. Besides, the Company has constantly adhered to the regulations set forth by the Stock Exchange of Thailand (SET) and the Securities Exchange Commission (SEC) that in turn, renders success according to the Company's established goals and objectives as well as gains trust and confidence from the shareholders and stakeholders throughout the supply chain.

Therefore, the Company has established policies and guidelines on corporate compliance to be in line with the Company's regulations, to clearly declare the Company's intention and to elevate the compliance standard of laws, rules and regulations pertinent to the Company's business operation as follows:

1. Compliance with relevant laws, rules and regulations

The directors, executives and employees of IRPC Group must respect and strictly comply with laws, rules and regulations relating to business operation to ensure smooth business operation while being in line with relevant laws, rules and regulations. Besides, the Company must maintain responsibility toward the society, community, environment, safety and occupational health of every stakeholder group which is considered the foundation of sustainable development.

2. Fair competition and opposition against monopoly

The directors, executives and employees of IRPC Group must comply with laws against monopoly or trade competition laws as well as encourage free and equitable trade competition, non-discrimination or exploitation of others.

3. Anti-corruption and anti-bribery

The directors, executives and employees of IRPC Group must act in accordance with laws regarding prevention of corruption and bribery made with the government official, foreign government official or private sector official.

4. Respect and compliance with human rights principle

The directors, executives and employees of IRPC Group must respect and comply with laws regarding labor and human rights as well as labor rights, women's rights, children's rights and human dignity, including freedom and equality of any persons being certified or protected by both Thai and international laws.

5. Protection of intellectual property rights

The directors, executives and employees of IRPC Group must protect and safeguard the intellectual properties under the possession of IRPC Public Company Limited and/or IRPC group from any breaches or unauthorized uses. Furthermore, the Company must respect and must not violate others' intellectual properties while promoting the executives and employees to create or invent their own intellectual property for the best interest of the Company and overall economy of the country.

6. Prevention and suppression of money laundering and opposition against financial contribution to the terrorist group

The director, executives and employees of IRPC Group must avoid falling prey of any money laundering schemes or avoid giving financial contribution to the terrorist group. Also, they must realize the importance of monitoring and giving clues to the officer when noticing any illegal acts as well as recording details and facts on finance or assets to ensure their consistency with both Thai and international laws.

7. Asset management, maintenance and accurate use of the Company's data

The directors, executives and employees of IRPC Group must maintain data and assets by adhering to good management standard and accuracy as stipulated by law to ensure that such data and assets will be used with utmost benefits and to prevent any damages or exploitations for personal gain or for other persons' interests improperly. In addition, they must conform to the confidentiality policy by emphasizing on legal principle and business ethics whereby data of the Company, customers, trade partners or personal data of other people shall not be disclosed or exploited for any other interests apart from those being authorized or those received as a result of a legitimate relationship which conforms to both Thai and international laws.

8. Responsibility toward the environment, health and safety

The directors, executives and employees of IRPC Group must operate business with responsibility toward the community, society and environment while taking into consideration the health and safety of every employee and stakeholder as well as organizing various projects to create awareness of every employee, executive and other relevant parties on a regular basis.

Announced on 31 May 2021

Mr. Kris Imsang

Chairman

(Air Marshal Bunsuib Prasit)

Chairman of Corporate Governance Committee

(Mr. Chawalit Tippawanich)

President and Chief Executive Officer

(By the resolution of the Board of Directors of IRPC Public Company Limited No. 6/2021 on 24 May 2021)

Guidelines on Compliance Policy to be in Accordance with Laws, Rules and Regulations

1. Compliance Principle and Framework

IRPC Public Company Limited (“the Company”) has specified the compliance principle and framework to be employed as operational guidelines. The Company must regularly and thoroughly communicate the corporate compliance to the Board of Directors, executives and related employees for their acknowledgement in order to ensure that such compliance will be effective and efficient while emphasizing on the awareness of such compliance and its potential impact on oneself and the Company.

1.1 Corporate Compliance Principle

(1) Commitment

The Board of Directors, the Sub-Committee, President and Chief Executive Officer, executives and every employee must be committed to act in compliance with the established regulations.

(2) Implementation

The Company must determine the policy, structure, role, duty and responsibility for corporate compliance and supervision of compliance as well as encourage the efficient and effective compliance procedures.

(3) Monitoring and Measuring

The Company must supervise the procedures relating to the inspection, monitoring and report of corporate compliance on a regular basis.

(4) Continual Improvement

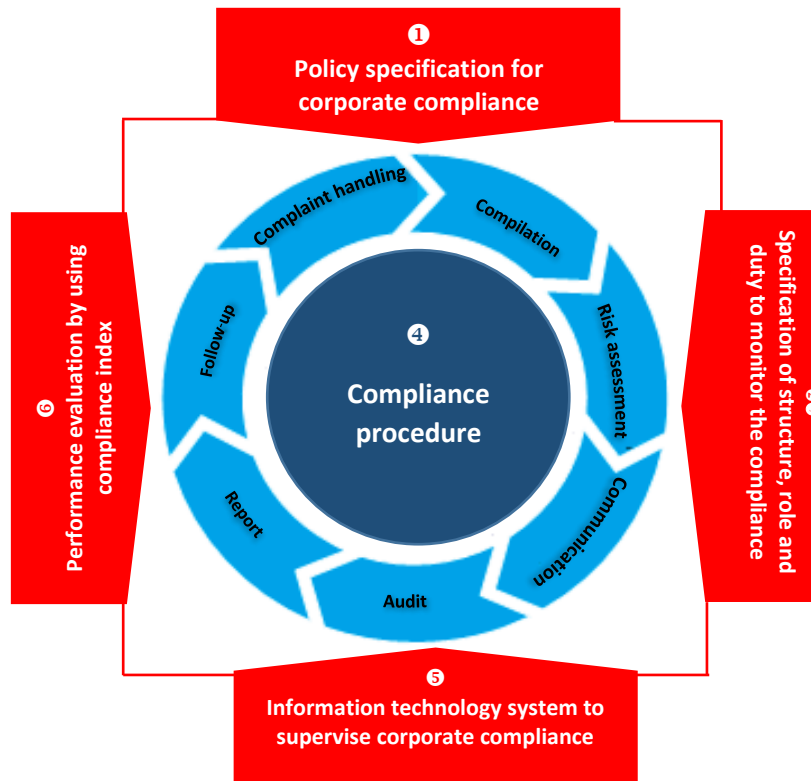
The Company must continually review and improve the corporate compliance procedures

1.2 Compliance Framework

The corporate compliance consists of 6 key components in which their correlation can be illustrated in the following diagram:

- (1) Policy specification
- (2) Structure Specification
- (3) Specification of roles and duties
- (4) Compliance procedures
- (5) Information technology system
- (6) Performance evaluation

Diagram illustrating the correlation of key components of corporate compliance



2. Corporate Compliance Procedures

The corporate compliance procedures are considered significant procedures that must be carried out consecutively to ensure that the Company is able to operate its business under changing business conditions and relevant regulations.

Currently, the Company has specified the Corporate Compliance Unit, Specific Areas Unit and Operating Unit to be responsible for carrying out the corporate compliance procedures in order to foster confidence that the Company’s business operation is in line with relevant regulations, laws, policies, operational procedures, business practices, contract obligations, standards and good practices, in which the Company must adhere and conform to. The corporate compliance procedures comprise of other sub-procedures as explained below:

- (1) Compilation of data on regulations
 - (1.1) Compilation of regulations
 - (1.2) Establishment and improvement of internal regulations

- (2) Assessment of risks regarding compliance
- (3) Communication, training and consultation
 - (3.1) Communication
 - (3.2) Training
 - (3.3) Consultation
- (4) Compliance audit
 - (4.1) Preparation of self-assessment plan
 - (4.2) Self-assessment
 - (4.3) Establishment of compliance audit plan
 - (4.4) Audit of compliance procedures
- (5) Report of compliance result and audit
- (6) Compliance monitoring
- (7) Handling of complaints regarding non-compliance

3. Roles and Duties in Monitoring Compliance

The specification of clear roles and duties in monitoring compliance which are consistent with the organizational structure helps foster corporate compliance to be more efficient while simultaneously minimizing redundancy in operation. Nonetheless, the specification of roles, duties and chain of report must be clear for every level of organizational structure such as the Board of Directors, the Sub-Committee, Chief Executive Officer and President, executives and employees which can be summarized as follows:

3.1 Board of Directors

(1) Supervise the Company to establish compliance policy, framework and procedures which are suitable for business operation condition and organizational culture as well as build confidence to ensure that various activities of the Company are in line with the regulations and consistent with acceptable risk level.

(2) Foster organizational culture and awareness of the significance of compliance as well as create appropriate environment to facilitate compliance for the executives, employees, including the Company's stakeholders while setting themselves as a good example for the employees

3.2 Corporate Governance Committee

(1) Have been assigned by the Board of Directors to supervise the Company's operations to be in accordance with the compliance policy and framework. The Corporate Governance Committee shall establish efficient and appropriate compliance procedures to ensure that the Company's operations are in line with relevant regulations.

(2) Determine, review and approve the compliance framework and policy to be up-to-date and suitable for the Company's operations and structure.

(3) Report to the Board of Directors for their acknowledgement of any significant matters when the non-compliance has been found out or report any factors or risky incidents that may affect the non-compliance which in turn may significantly impact the Company.

(4) Promote organizational culture and foster awareness of the importance of corporate compliance as well as create a favorable environment to facilitate corporate compliance for the executives, employees, stakeholders while being a good example for all employees.

3.3 Audit Committee

Review corporate compliance procedures as well as follow up the rectification and improvement to ensure that the Company has established efficient internal control system that can prevent, discover and manage potential risks, resulting from non-compliance.

3.4 Risk Management Committee

Supervise risk management procedures in terms of corporate governance to ensure the efficiency and consistency of the Company's risk management procedures to be in line with current operation while being able to identify and assess potential risks regarding corporate compliance that may significantly impact the Company.

3.5 Nomination and Remuneration Committee

Supervise the recruitment of personnel who possess qualifications, knowledge and capability pertinent to the Company's requirements, establish a succession and development plan for the executives with suitable potential while strictly adhering to the regulations according to their respective duties and responsibilities.

3.6 President and Chief Executive Officer and Executives

(1) Ensure that the corporate governance policy and framework that have already been approved will be put into practice, communicate, act and consistently monitor the operation to be in line with relevant regulations.

(2) Report to the Board of Directors to acknowledge any significant matters in a case where non-compliance has been found out or report any risk factors and incidents relating to non-compliance which may incur significant impact on the Company.

3.7 Management Committee

(1) Supervise according to their assigned role, duty and responsibility

(2) Supervise and monitor the compliance of regulations under their responsibility as well as be responsible for and monitor the non-compliance which may incur a significant impact on the Company.

3.8 Corporate Compliance Unit

(1) Supervise the corporate compliance, encourage, promote and give advice to ensure that the operation of each area of the Company will be in compliance with regulations, policies and corporate compliance procedures that have already been approved

(2) Report any non-compliances and measures to rectify and improve operation as well as report any risk factors and incidents relating to non-compliance which may incur significant impact on the President and the Corporate Governance Committee

(3) Collaborate to report information pertinent to the Audit Committee, the Risk Management Committee and the Management Committee

(4) Cooperate with the internal supervisory unit or other relevant government agencies as well as submit the report within the time specified

(5) Promote organizational culture and foster awareness of the importance of corporate compliance as well as create favorable environment to facilitate corporate compliance for the executives, employees, stakeholders while being a good example for all employees

3.9 Functional Compliance Unit

Has the duty to collaborate with the central unit responsible for corporate compliance and perform their duty according to specified corporate compliance framework and procedures.

3.10 Executives of Every Unit

(1) Study and endeavor to understand their own role and duty while being responsible for complying with corporate compliance framework and policy, including other relevant regulations

(2) Ensure that the corporate compliance policy and framework that have already been approved will be put into practice, communicate, act and consistently monitor the operation to be in line with relevant regulations.

(3) Report to the unit responsible for monitoring the corporate compliance to acknowledge any key matters in a case where non-compliance has been found out or report any risk factors and incidents relating to non-compliance which may incur significant impact on the Company.

(4) Promote organizational culture and foster awareness of the importance of corporate compliance as well as create appropriate environment to facilitate corporate compliance for the executives, employees, stakeholders while being a good example for all employees.

3.11 Employees of Every Unit

(1) Study and endeavor to understand their own role and duty while being responsible for complying with corporate compliance framework and policy, including other relevant regulations.

(2) Report any non-compliances that have been found out to the line supervisor or report any risk factors or incidents relating to non-compliance which may incur significant impact on the Company.

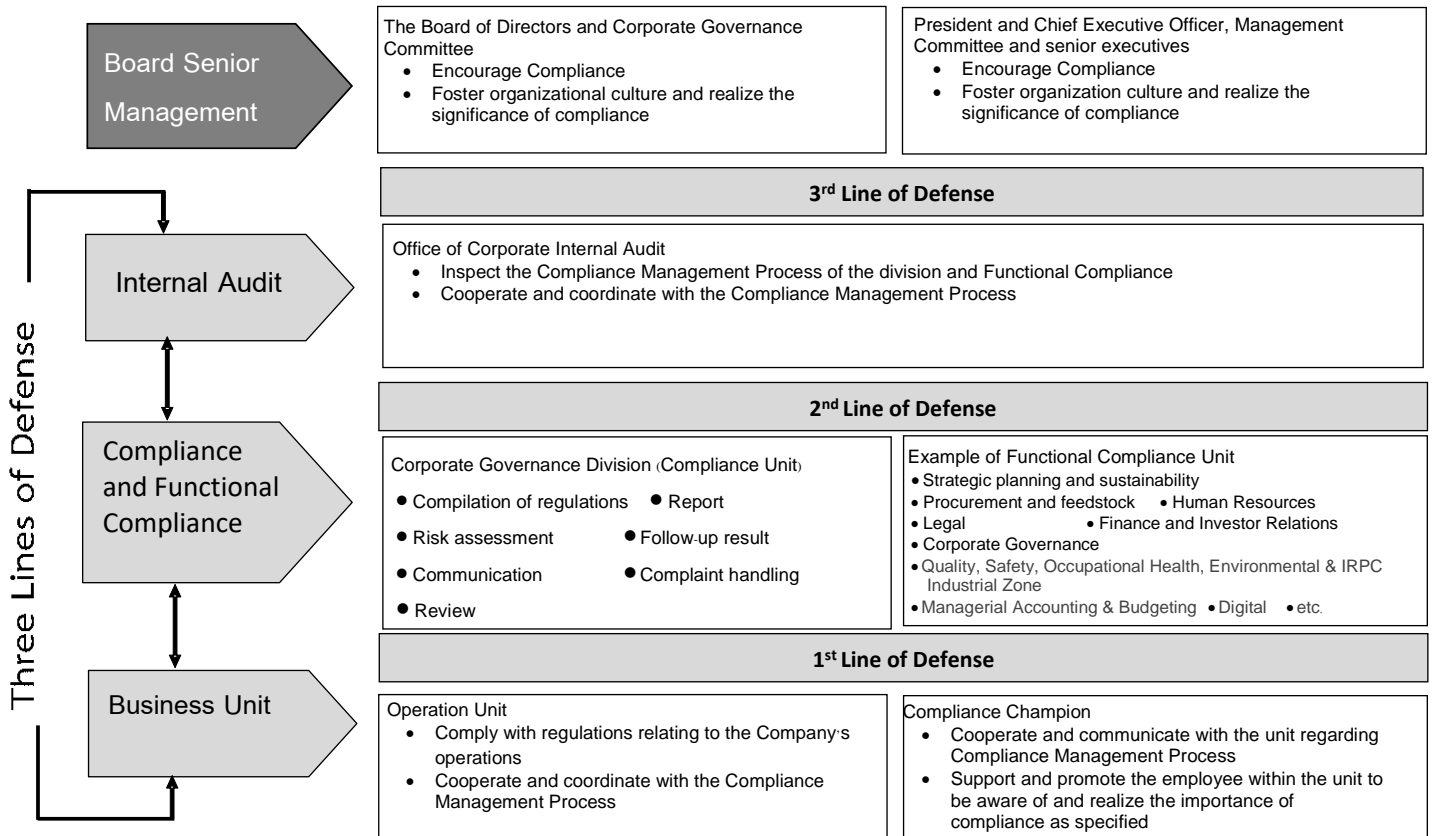
3.12 Corporate Compliance shall link the duties of these three lines of defense as follows:

(1) First Line of Defense or 1st Line is the unit that establishes the procedures required for corporate compliance while being responsible for promoting the compliance and risk assessment of other relevant regulations, self-assessment, report and follow-up of corporate compliance.

(2) Second Line of Defense or 2nd Line is the unit providing support and supervise the corporate compliance and has the duty to monitor, support and give advice to various units to ensure their corporate compliance.

(3) Third Line of Defense or 3rd Line is the internal control unit responsible for an independent inspection of corporate compliance.

Roles and duties of each line of defense



4. Criteria of Corporate Compliance

The regulations stated in this policy shall cover laws, rules, regulations and ethical conduct relating to the Company's business operation which encompass the following regulations:

(1) Laws and regulations refer to laws, rules, regulations and specifications stipulated by law or government agency whereby the Company must inevitably conform to.

(2) IRPC's financial policies and procedures refer to the specifications, orders or other criteria relating to finance, accounting and budget determined by the Company.

(3) IRPC's operational policies and procedures refer to the specification, order or guidelines relating to operation in other areas apart from finance, accounting or budget determined by the Company.

(4) IRPC's business conduct standards refer to the specifications concerning business operation principles, practices on ethical conduct to which the Company has adhered or established.

(5) Contracts and commitments refer to the obligations with which the Company must comply as set forth in the contract.

(6) IRPC's strategic voluntary standards refer to the policies or practices the Company has adhered to or established voluntarily in accordance with the expectation of the stakeholders.

5. Whistleblowing or Complaint Filing

Personnel of IRPC must not neglect or ignore when noticing any behaviors that may violate the Company's regulations or this policy and they must inform the supervisor or corporate compliance unit. In addition, the Company shall provide the whistleblowing and complaint filing channels, including the whistle blower protection which must be in line with the regulations set forth by IRPC Public Company Limited. However, every clue and complaint will be inspected and verified for fact. If additional information or evidence are available, further action shall be carried out.

Channels for whistleblowing or complaint filing:

- Via e-mail: auditor@irpc.co.th
- Via regular mail: Chairman of the Audit Committee
IRPC Public Company Limited
555/2 Energy Complex Center, B Building, 6th Floor
Vibhavadi Rangsit Road, Chatuchak, Chatuchak,
Bangkok 10900
- Via P.O Box: P.O Box 35 Por Nor For, Suntower Building
Bangkok 10905

6. Penalty

The Company has established procedures to consider appropriate disciplinary action and penalty for the personnel who do not comply with the Company's regulations or this policy. Such penalty includes termination of employment if the Company deems necessary. Any acts that violate or do not comply with the Company's regulations or this policy, whether directly or indirectly, shall receive a disciplinary action according to the specification of operation set forth by the Company or may be punishable by law.

7. Review of Corporate Compliance Policy

This policy shall be reviewed on an annual basis or when it deemed inconsistent with the condition of business operation of the Company. The corporate compliance unit must propose to the Corporate Governance Committee for their approval on further improvement of corporate governance policies and guidelines. In a case that there are any changes of significant matter or change of a considerable volume, the corporate compliance unit must propose such matter to the Board of Directors for further approval.

Details of Corporate Compliance to be in Accordance with laws, rules and regulations

Policy #1: Compliance with relevant laws, rules and regulations

"The directors, executives and employees of IRPC Group must strictly respect and act in accordance with laws, rules and regulations relating to business operation in order to facilitate business operation and ensure the accuracy according to relevant laws, rules, regulations while maintaining the responsibility toward society, community, environment, including safety and hygiene of every stakeholder group which is considered a foundation of sustainable development"

1. Basic Principle

- The executives and employees shall study, endeavor to understand and conform to laws relating to business operations of the Company and subsidiaries while regularly inspecting to ensure that laws, rules and regulations set forth for such operation are up-to-date.
- Comply with the Company's policies, including the handbook of corporate governance and business ethics of the Company.
- Act in accordance with rules, specifications, regulations, procedures or standards relating to the operation within the Company, including other guidelines as stated in the contract. In a case

that law has stipulated the procedures and approaches, the executives and employees shall establish their To Do List and Check List in operation.

- Any breaches against rules, regulations and specifications concerning internal operation, regulations and guidance stipulated by the Company shall receive a disciplinary action as set forth by Regulations of Operation B.E.2551. The penalty may be severe and lead to job dismissal and other legal proceedings.

2. Guidelines

- Any juristic acts or contracts made by the Company must be in accordance with the format and guidelines stipulated by law. The purposes of such juristic act or contract must not violate relevant laws or must not contradict to the peacefulness or morality of the citizen.
- Study and strictly comply with the authorization power chart, guidelines on authority delegation, and criteria of one's authority as assigned while refraining from carrying out any duties or make any agreements or give promises to others without authority. In a case that the breach may incur damage to the Company and such person may be filed for legal proceedings.
- Respect and comply with tradition and culture of each community and area of operation while refraining from any violations or breaches against local traditions.
- Comply with the agreement set forth by international organization or international standards the Company has practiced such as UN Global Compact, Sustainable Development Goals and corporate governance principle of OECD.

Policy #2: Fair Competition and Anti-Monopoly

"The directors, executives and employees of IRPC Group must conform to laws regarding the prevention of monopoly or trade competition as well as encourage independent and fair trade competition, non-discrimination or exploitation of others."

2.1 Basic Principle

- Comply with Thai laws, rules and regulations and international standards regarding the prevention of monopoly or trade competition, including international trade law
- Must not act or make any agreement with trade competitor or other parties or gathering among manufacturers in a manner that minimize or obstruct free trade competition or in a manner indicating monopoly; for example, the agreement to specify the quantity of products, price specification among the entrepreneurs, specification of selling price of customer's product, allocation, selling based on the customer group, agreement on market segregation according

to a specific area, enforcement to purchase or pay service fees or agreement made upon unfair condition

- Do not disclose or exchange confidential marketing data with the entrepreneur of the same business as specified by commercial competition law such as price and discount, cost, production capacity, sales volume, purchasing volume, marketing plan, profit margin, credit terms, data acquisition, lists and confidential data of the customers, trade partners or other manufacturers

2.2 Guidelines

- Avoid any behaviors that imply unfair trade practice such as the use of bargaining power to determine trade conditions that may limit trade opportunity or alternative of the trade partner
- The Company has emphasized on enforcing trade competition law in a case where a legal breach as stipulated by such law has been found out. If severe damages have taken place, the Company, executives and other related personnel must be accountable for any damages according to the Civil Code or be penalized as stipulated by the Criminal Code which includes fines and imprisonment
- Study and comply with laws relating to import-export of customs products, Anti-Dumping and Countervailing Act and support of foreign merchandises, law on the protection of increased number of import goods of the country where the Company has sold its products to prevent the Company from being affected by international trade barrier measures. Such legal breaches in other foreign countries will cause the Company to pay fines or carry the Countervailing Duty (CVD) or may be prohibited from selling goods in that country

2.3 Nature of Illegal Conduct Regarding Trade Competition

- Abuse of Dominant Position
 - (1) Specify or maintain unfair selling price or service fees
 - (2) Determine the conditions in a manner that forces, whether directly or indirectly, other entrepreneurs who are the Company's customers to limit their own services, productions, purchases or sales of products or may limit the opportunity in purchasing or selling products, acquisition or offering of service in procuring credit from other entrepreneurs
 - (3) Withhold, reduce or limit services, productions, purchases, sales, deliveries, imports into the Kingdom without inappropriate reason, destroy or cause any damages of goods in order to reduce the quantity to be lower than the requirement of the market

- Merger, acquisition and amalgamation that may incur monopoly or unfair trade competition according to the notification of the Trade Competition Committee announced in the Government Gazette, unless otherwise being authorized by the Trade Competition Committee
- Agreement and collaboration between cartels, any acts that create monopoly or minimize the competition or limit competition in any particular market; for example, price fixing, limitation of sales volume of products or services, allocation of market shares, fixing of purchasing price or quantity of purchased goods or price, collaboration in fixing the bidding price in order that one party will get bidding and agreement made in order to control the market etc.
- Agreement made with foreign entrepreneurs to obstruct purchase of domestic consumers which is considered as business relation with foreign entrepreneur in order that purchasing opportunity of product or service from such foreign entrepreneur will be limited for a person living in the country who intends to purchase product or service for his/her own consumption

Policy# 3: Anti-Corruption or Anti-Bribery

“The directors, executives and employees of IRPC Group must act in accordance with laws relating to the prevention of corruption and bribery with the government official or foreign government official or officers of the private sector.”

The Company has set the policy to operate business with honesty, morality and fairness in every step of operation, whether such business is operated domestically or abroad. Furthermore, the Company shall comply with relevant laws and regulations. The Company strongly believes that the business growth can be achieved by business capability and trust from every sector. Therefore, the operation of every level must be transparent, verifiable and shall be for the purpose of legitimate business operation.

The Company strongly affirms that any offering, giving and receiving of bribes, to and from the government official, both domestic and foreign, or officers of both domestic and foreign private sector are strictly prohibited and deemed a violation against the Company’s policy even though such act may cause the Company to lose its business opportunity.

3.1 Basic Principle

- The executives, employees and persons responsible for the Company’s business operation must act in line with measures on anti-fraud, giving or receiving bribes by adhering to the Company’s anti-corruption policy as well as other laws relating to fraud prevention and suppression, international practices in which the Company and Thailand are also member;

for example, UN Global Compact, United Nations Convention Against Corruption, Private Sector Collective Action Against Corruption (CAC)

- Giving and receiving bribes in any forms shall be deemed a severe breach and unethical conduct in which disciplinary action or criminal proceedings must be considered. Nonetheless, the executives, employees and every related person must always be aware that giving and receiving bribes will defame the honor, reputation and image of both Company and oneself.

3.2 Guidelines

- Perform one's respective duties with transparency, be able to clarify steps and rationale of operation while being ready to be inspected by the authoritative agency
- It is prohibited to propose or offer money, asset, gift, entertainment, travel or any other benefits to any persons, including spouse, children or any persons relating to the government official, customer, trade partner and person in contact in order to attain one's own interest, operational or business-related interest. Besides, other persons are prohibited to act on one's behalf
- Giving gift, souvenir on some special occasions such as New Year festival is allowed and not considered a breach of relevant laws and local tradition; for example, giving gift with the price not over 3,000 baht per person per occasion which is also in accordance with the notification of the National Anti-Corruption Commission (NACC). Any giving of gift or souvenir shall be in a form that helps promote the image of IRPC Group according to the policies and guidelines on anti- corruption regarding giving and receiving gift, entertainment or any other benefits. Souvenirs offered on important business occasion such as the inauguration day, signing of business contract can be done but if the value of such souvenir exceeds 3,000 baht, the top executive must grant prior approval or such offering must be strictly carried out according to the Company's regulations.
- It is prohibited to ask for money, asset, gift, entertainment, travel or any other interests from any persons in order to gain one's own interest, operational or business-related interests. Besides, other persons are prohibited to act on one's behalf.
- Personnel of IRPC Group shall refrain from receiving gifts or any other interests in every circumstance and shall inform other outsiders to acknowledge the Company's No Gift Policy.
- In a case where it is inevitable to receive gift, souvenir or any other interests and it is unable to return such gift, souvenir or interest, the executives, employees and personnel of IRPC Group must inform the Company or responsible unit to gather such items and donate them to other

outsiders or external agencies for charitable purpose or public interest according to the established regulations of IRPC Group.

- Political contributions, donations, fundings, gifts, entertainments and other expenditures must be proceeded in compliance with business ethics and handbook of good corporate governance of the Company. Nonetheless, donations and contributions provided to the public sector or government official, including charitable organization must be credible and trustworthy and/or must be legally established and must also carry out on behalf of the Company Group.
- Business entertainment must be performed with care and on the basis of good business practice and must not violate against the anti-corruption policy.
- CSR activities jointly organized with the government agency or government official can be done as deemed necessary on behalf of the Company Group. However, the guidelines, operation plans and clear assessment procedures must be established by adhering to the Company's regulations and operational steps.
- Acceptance of meeting proposal, training, seminar, business visit under the trade partner's budget must be in accordance with the agreement specified in the contract or the Company's regulations. Besides, meeting or seminar proposals with inherent purpose of travelling without any intentions to relay knowledge are considered inappropriate.
- Avoid any situations or activities that may cause conflicts of interest and must not allow one's position, relationship or personal matter to affect the decision making in making any business transactions of the Company which in turn may incur severe damages to the Company's reputation and image.
- In a case where any fraudulent acts, giving or receiving bribes, including improper exploitation have been found out, the whistleblower shall report such suspicious acts via different channels of the Company in which data shall be kept confidential and every data will be inspected and processed according to the procedures specified.
- The Company shall take adequate measures if any fraudulent acts, giving or receiving bribes and improper exploitations have been found out.

Policy# 4: Respect of and Compliance with Human Rights Principle

“The directors, executives and employees of IRPC group must respect and comply with laws relating to labor and human rights while respecting labor rights, women's rights, children's rights and

human dignity, including the freedom and equality of an individual who has been certified or protected by both Thai and international laws.”

Employee: The Company shall treat every employee on the legal basis while strictly adhering to labor law, occupational health and safety, non-discrimination with regard to nationality, religion, gender and skin color while promoting equal opportunity of decent work, coupled with efficiency, freedom, human dignity and abstaining from using children’s labor as prescribed by the International Labour Organization in which Thailand had joined forces and given ratification.

Community: The Company shall operate business on the basis of respect for the community’s rights by taking into consideration the potential impact on health, community and environment while ensuring that any concerns of the surrounding community will be heard and rectified promptly (Community Engagement and Feedback) as well as respect local tradition and support community engagement to foster sustainability in various forms.

Supply Chain: The Company shall select the counterparty, trade partner, contractor and other supply chains who act responsibly toward society, environment and business operation according to the human rights principle.

4.1 Basic Principle

The Company has the duty and obligation to take into consideration the human rights principle. The Company has emphasized on the importance of human rights of the employees, community and supply chain to be in line with the philosophy of business operation of the Company in fostering sustainable, business strength and growth, coupled with the consideration of the community, society and environment.

4.2 Guidelines

4.2.1 Human rights and rights according to labour law

- The recruitment, employment, assessment, job promotion, job transfer, appointment, training, development, disciplinary investigation, compensation and termination of contract must take into consideration some key indicators such as the qualifications, knowledge, ability, suitability and performance, including morality and ethical conduct.
- Respect an individual’s basic rights and personal freedom by complying with labor protection law, labor relations law, occupational safety, health and environment law as well as the regulations issued by the government agency. Furthermore, the Company shall not exploit their power to bargain or force the employee to make any agreements that are deemed a deprivation of their basic right entitled by law.

- Respect the rights and benefits of the employees according to the International Labour Organization (ILO) on the principle and basic right in operation and in accordance with the law and principle of UN Global Compact.

4.2.2 Equality and sexual harassment

- Treat everyone equally and with respect. Do not discriminate others by the reason of personal relationship or differences in nationality, ethnicity, family's origin, religion, social status, gender, sexual orientation, age, characteristics, physical traits, language, political opinion, personal viewpoint, asset or any other conditions.
- Avoid any threatening or intimidating acts or refrain from using any words that may cause fear or embarrassment or any mockeries or avoid using inappropriate criticism, dissemination, display that may incur disgrace and the condition that discourages employees. Besides, any acts or words indicating molest, flirtation or sexual harassment, including any other acts that illegitimately offend others must also be avoided.

4.2.3 Personal rights

- Do not disclose or make criticism of personal data such as personal background, education, shareholding, health record, criminal record, work experience, data of family members, honor, reputation, address, phone number, data relating to the performance of the Company's employee to other outsiders without authorization and in a manner that may cause any damages to the implicated person or the Company's reputation or image, unless such disclosure is to provide data to the government agency or information disclosure is conducted within the criteria stipulated by law.

4.2.4 Women's rights and children's rights

- Treat every woman in accordance with the Convention on the Elimination of All Forms of Discrimination against Women; for example, arrange suitable working hours for pregnant employees that is not deemed hazardous to their pregnancy or may incur any dangers to the fetus. Besides, the Company must not terminate their employment, demote or deprive the pregnant employees of any benefits resulting from their pregnancy. The Company shall also facilitate female employees to perform their best motherhood role; for example, arrange a designated area where mothers can store their breastmilk etc.
- Treat children according to the children's rights and business principles of UNICEF in which the objectives are to promote, manage and prevent any operations which may incur an impact on the children's rights. The Company shall specify various measures to avoid children's

employment as well as respect and promote children's rights while simultaneously opposing the use of children's labor.

Policy# 5: Protection of Intellectual Property Rights

"The directors, executives and personnel of IRPC Group must protect and safeguard the intellectual properties owned by IRPC Public Company Limited and/or IRPC Group to be safe and secured from any breaches or unauthorized uses. In addition, the directors, executives and personnel of IRPC Group must respect and must not use others' intellectual properties while promoting the executives and employees to initiate or create their own intellectual property for the Company's interest, including an overall economy of the country.

5.1 Basic Principle

- Every executive and employee must act in accordance with relevant laws, rules and regulations regarding intellectual property, both domestic and international, such as laws relating to copyright, patent, trademark, trade secret or the WTO's Agreement of Trade-Related Aspects of Intellectual Property Rights (TRIPS) as well as respect and comply with the obligations of the contract or agreement bound by the Company.

5.2 Guidelines

- Do not use intellectual properties of the Company to gain personal interest or disseminate to public without prior approval of the Company.
- Any contracts of the Company with a nature that hires any persons to make an item and/or a work that can be considered as intellectual property, regardless of its type, must be specified and clearly indicated in the contract in order that the contractor can grant his/her right of such intellectual property to the Company.
- Any contracts concerning the Company's intellectual properties must be made in a written document and must clearly indicate the owner of such intellectual property. In a case that it is allowed to exercise the intellectual property right, the Company must clearly determine the criteria, objectives and duration.
- Any transfers of intellectual property rights to other persons, the Company must comply with the criteria stipulated by law and such transfer can be done only by the Company's person in authority.
- To ensure that the Company's intellectual properties shall be protected as stipulated by law, the person responsible for handling such intellectual property must prepare all documents and

evidence in advance and shall submit such documents and evidence for registration or extension to the government official within the period prescribed by law.

- Support and give information, document, and evidence to the Company or act as a witness for the Company in the registration of right, assertion of right and protection of intellectual property right of the Company.
- Take precaution in employing intellectual properties of the Company or of other parties without authorization since the breach of intellectual property is considered a disciplinary offense and may be filed as a criminal case or may have to pay for damage fees according to civil litigation.
- The executive or employee, upon his/her employment termination, must return all intellectual properties such as an invention, report, statistic, program, blueprint, method, trade data, production cost data, production formula, product cost formula, software, technical approach, manufacturing procedure, including other procedures under his/her own possession, to the Company.

5.3 Copyright

The Copyright Act B.E.2533 defined the term “copyright” as a type of intellectual property that gives its owner the exclusive right to make copies of a creative work. Besides, such act has indicated other works that may be considered as copyright which consist of:

1. Literature (book, booklet, publication, speech, program, computer etc.)
2. Dramatic works (dance, choreography etc.)
3. Fine arts (painting, sculpture, print, photo, applied arts etc.)
4. Music (rhyme, rhyme and lyrics etc.)
5. Sound recording (CD)
6. Audio visual material (VCD, DVD with pictures and sound)
7. Cinema
8. Broadcasting works
9. Any other works in the literature, science or arts department

Guidelines

- Any utilizations, repetitions, modifications, discoveries or disseminations of the Company’s copyright works to the public, whether entirely or partially, must be authorized by the Company.
- Must take precaution of the use of copyright works, especially works that are pictures, literatures, music, sound recordings, photo recordings or sound recordings and photo during
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operation or when used in the social media. Nonetheless, when any intellectual properties are employed, it is recommended to study the criteria on accurate and legitimate use.

5.4 Patent/ petty patent

The Patent Act B.E. 2522 had defined the word “patent” as a document issued to grant protection for an invention or a product design and is the privileged right granted to the inventor or designer of a product to manufacture and sell such product exclusively during a specific period. Petty patent refers to a document issued to grant protection for an invention in a similar nature but is considered an invention that lacks a high level of inventive novelty or an invention that does not involve an inventive step but capable of industrial application.

Guidelines

- Must keep confidential all inventions, product designs or discoveries acquired by new and improved process that has not been registered as patent or petty patent.
- In a case where other persons are authorized to arrange for or gain access to invention information, product design or invention with new production process that helps improve such product or process, it is required to make a confidentiality contract regarding any works of such nature.

5.5 Trademark

The Trademark Act B.E.2534 defined the term “trademark” as a sign or symbol or mark used to identify products or services. The signs under the protection of the Trademark Act B.E.2534 consist of trademark, service mark, certification mark and collective mark.

Guidelines

The use of the Company’s trademark or product mark must be granted with the Company’s permission while taking into consideration the appropriateness and care to ensure the Company’s utmost interests.

In selling the Company’s products abroad, it deems necessary to register the trademark in the country where such product has been sold and/or registered the trademark in accordance with Madrid Protocol in order that the Company’s trademark right will be protected.

5.6 Trade secret

Trade Secret Act B.E. 2545 defined the term “trade secret” as commercial data that has not been generally known or still inaccessible among groups of people in connection with such data. Such data must be used for commercial purposes owing to their confidentiality and shall be the data that the owner or the controller of trade secret has employed an appropriate approach in maintaining their

confidentiality. Besides, the executive and the employee who possess, control and are assigned to maintain trade secret such as trade data, cost data, product manufacturing, production formula, price formula, product, format, software, technical approach, manufacturing procedure, administration data, details on the price of goods, lists of customers, advertising strategies etc. must keep and maintain these data in accordance with the policies, regulations, specifications or contracts set forth by the Company.

Guidelines

- The executive or employee who possesses, controls and a person assigned to protect trade secret must establish various measures in order to put into system the data control system under his/her own responsibility to ensure its efficiency; for example, affix the seal "Confidential" on the document.
- Keep the confidential information in the safe place such as use key, keep in a vault, decode in order to access confidential data etc.
- Prohibit an access of any trade secret data without authorization or prohibit anyone from bringing the data out of the designated area.
- Shall establish the monitoring system and follow up data movement and location such as setting the controlling system for documents in order to facilitate the inspection whenever the documents are brought out of the designated area.
- Shall establish data inspection system of the Company which shall be made under the confidentiality contract to ensure whether such established system has been complied. Specifically, the Company shall ensure whether all documents specified in the contract have been returned or destroyed upon termination of the contract.
- Take every precaution when bringing any outsiders to visit the Company's premises, regularly check for any news, documents or articles whether trade secret has been referred to.
- Specify the criteria in getting rid of the documents that are no longer used, both the Company's data and data of the counterparty when such use is terminated and the statute of limitations is already due.

5.7 Illegal offenses regarding computer-related crime

- Study and endeavor to understand the context of Computer-Related Crime Act B.E. 2550 which determines the nature of fraudulent acts and must be penalized according to the Criminal Code such as:

- Access to the computer system or data of others with specific preventive measures
- Sniffing attack of computer data of other persons during communication and such data are not considered as public data
- Destruction, rectification or change of computer data of others illegally
- Make computer system of other persons to be suspended, delayed or disturbed, send computer data via e-mail
- Input inappropriate data into computer system that may incur damage to the Company or others such as fake data, false data, indecent data or data offending the country's security etc.
- The determination or transfer of inappropriate or unauthorized data or in a manner that may incur damage to others, whether such data are self-generated or transfer of data acquired from others
- Allow others to input inappropriate data into the computer system under one's responsibility. Create, cut or modify others' pictures in a manner that may defame, insult others or incur hatred or embarrassment to other persons.

Policy# 6: Prevention and Suppression of Money Laundering and Financial Contribution to the Terrorist Group

“The directors, executives and employees of IRPC Group must take every precaution to avoid being a victim of money laundering scheme or financial contribution to the terrorist group. They shall emphasize on the monitoring and notify the officer in case they have discovered any clues that may lead to illegal conduct as well a record items and facts regarding finance or assets accurately and in accordance with both Thai and international laws.”

6.1 Basic Principle

Every employee has the duty to comply with the established policies and procedures in order to prevent themselves from being involved with money laundering scheme and to ensure that the Company has strictly adhered to the specifications in reporting data as determined by financial guidelines.

6.2 Guidelines

6.2.1 Prevention of money laundering

Money laundering refers to money or assets acquired by committing crime and then make investment of such money in a legal business with the objective to conceal the source of invested money or assets in order to use the profits derived from such crime for one's own interest.

Crime according to money laundering act or financial contribution given to the terrorist group such as illegal act concerning drugs, gender (such as women and children trafficking, prostitution etc.), wrongful act regarding business fraud in the financial institution, offense relating to the position in the government sector, extortion or blackmail, customs smuggling according to the customs law, offense concerning the terrorist act as stipulated in the Criminal Code, offense relating to gambling, specifically when one is a person who arranges such gambling, offense regarding the election and human trafficking etc.

- The executive or employee must review facts of the customers, counterparties or trade partners such as Know your Customer (KYC) and inspect to learn about Customer Due Diligence (CDD) in order to acknowledge some basic facts such as director, authorized person, major shareholder, location of the headquarter, objectives of business operation, sources of funding, history of business operation, business that generates profits etc. by checking information from the government agency or other organizations, including credible press media.
- Do not make any transactions with a person suspicious of illegal act or handle assets or revenues relating to crime. In a case where the Company prefers to know whether the customer, counterparty or trade partner has made irregular business transaction; for example, offer overrated terms or agreements or suspect any money launderings, they must report these matters to the Company via the specified channels for whistleblowing or complaint filing.
- It is prohibited for the Company to purchase, use, and possess assets acquired by any illegal means, unless otherwise such assets have been acquired from the auction of Legal Execution Department.
- Cooperate with the agency responsible for complying with measures on the prevention and suppression of money laundering and opposition against financial contribution to the terrorist group set forth for both domestic and international practice.
- Inform the customers, counterparties or trade partners to avoid any acts in a manner that conceals or covers up, acquisition, sales, payment, transfer or acquisition of right in asset in accordance with law regarding the prevention and suppression of money laundering and opposition against financial contribution to the terrorist group.
- Maintain documents or customers' records for a minimum of 5 years, starting from the date of the termination of relationship with the counterparties, customers or trade partners.

6.2.2 Prevention of financial contribution to the terrorist group

- Do not settle debts by transferring money to any unknown person or any persons who are not the Company's counterparties, customers or trade partners in the country where severe terrorist act takes place.
- Do not receive cash or cash equivalent prior to the settlement due date. However, business normality shall also be considered.
- Do not receive any payments in a form of financial instrument that cannot identify the connection with the payer, except otherwise specified as normal condition by the financial institution.

Policy# 7: Asset Management, Maintenance and Accurate Use of the Company's Data

The directors, executives and employees of IRPC Group must maintain all data and assets by adhering to good management standards and must act in line with the established law to ensure that all data and assets will be employed with the maximum interest, prevent them from any damages or incorrect uses to benefit personal interest or interest of others. Besides, the directors, executives and every personnel must act in accordance with the confidentiality principle by conforming to relevant laws and business ethics and must not disclose or use data of the Company, customers, trade partners or personal data of other people for their personal gain, apart from that being authorized or apart from that acquired from the connection as stipulated by Thai and international laws.

The Company's assets, whether they be tangible assets, financial assets, intellectual properties or the Company's data, are deemed valuable. Therefore, the executives, directors and every personnel must employ such assets efficiently and to ensure their highest benefits. Furthermore, all assets must be protected and maintained from being damaged, lost and must remain safe from any frauds, theft and unauthorized use with the purpose to gain personal interest or interest of others.

7.1 Basic Principle

- Study and act according to the regulations set forth by the Company and associated companies concerning the management of information technology, material procurement, usage criteria, data and assets. Every director, executive and personnel have the duty to keep confidential the data of the counterparties, customers or trade partners as well as prevent such data from being breached or protect them from any improper, unauthorized or illegal uses. In addition, disclosure of data or trade secret data must be penalized according to the Criminal Code, trade secret law, including computer-related crime law.

7.2 Guidelines

- Maintain the Company's assets and prevent them from any damages, lost, theft, embezzlement or illegal and unethical use as well as comply with measures on the protection of confidential data or data that are not specified as public data in order to benefit business operation while maintaining the standards of data protection and correct use of news and information.
- Use the Company's assets to achieve business objectives, do not use the Company's equipment or assets for personal interest and such act shall not affect the Company's interest or operational efficiency.
- Classify and maintain any data, documents, evidences or assets that must be specifically kept as the Company's secret such as trade data, production cost, production formula, price formula, software, technical approach, manufacturing procedures, business administration data, list of customers, product advertising strategy, personal data of the executives and employees.
- In a case where it deems necessary to use data or personal data of the counterparty, customer or trade partner, such use shall not be regarded as data breach of the data subject and data or personal data must be used only within the specified criterial and with utmost care. Data must always be reviewed to ensure their accuracy unless such data have already been disclosed to the public.
- Systematic data management and access of the Company's data must be established to prevent from any unauthorized uses and the Company must not allow others to use password to gain access the one's own IT system or that of the Company.
- Take every precaution in using information technology by avoiding any misuses or unintentional disclosures such as use of computer or phone conversation of which data can be transmitted, e-mail conversation, including transfer of confidential data to other persons with or without intention owing to one's negligence or acquisition.
- Avoid any acts that violate the contract relating to non-disclosure to the outsiders; for example, do not disclose trade data of one's employer to others, especially to the competitor while working with such employer or after employment termination.
- Do not disclose data or estimates of financial budget or forecast of income or profit of each quarter of which their disclosure date to the Stock Exchange of Thailand is almost due since such disclosure may be considered as an effort or solicitation which in turn may affect the asset price.

Policy# 8: Responsibility toward the Environment, Health and Safety

The directors, executives and employees of IRPC Group must operate business by strictly adhering to responsibility toward the community, society and environment while taking into consideration the safety of every employee and stakeholder group as well as organize projects to instill awareness of the employees, executives and other related parties in such matter.

The Company has strived to conserve the environment, maintain health and safety throughout business operation procedures, starting from the assessment of environmental impact before making any investments in any projects or businesses. Besides, the Company has employed suitable technology to prevent environmental impact, resulting from its business operation. The Company has also instilled awareness and responsibility toward the environment, health and safety of the employees, including other related parties.

8.1 Basic Principle

- The Company's operational procedures must be in accordance with laws, regulations, practices, standards and guidelines on the environment, health and safety as well as cooperate and conform to the agreement at an international level in order to prevent or minimize potential impact that may arise.
- Study and endeavor to understand operation handbook and emergency plans when working in every area of operation as well as participate in every emergency drill of the Company.

8.2 Guidelines

- Assess risks and impacts on the environment, health and safety before designing and developing any procedures, projects or products in order to plan for or prepare suitable measures. Nonetheless, the Company has constantly realized the importance of the environment and safety of the community, including complaints that may arise for the consideration, rectification and proceedings of sustainable preventive measures.
- Supervise and control manufacturing processes, equipment or machine to minimize pollution that may affect the environment health and safety of the employees, community and every related party. Nonetheless, when any unsafe working conditions or environments have been found out, the operation must be suspended and report should be made to the responsible party immediately in order that such dangerous condition will be solved and rectified before further operation can continue.

- Support and assist in the area of environment, health and safety for the society and community while collaborating with both government and private agencies when natural disasters such as inundation, windstorm arise as deemed necessary and appropriate for each particular case.
- Promote and instill awareness of environmental conservation, health and safety for every stakeholder group via different channels as deemed appropriate such as meeting and seminar attendance, participation in various activities organized by the Company.