

**CODE OF CONDUCT FOR EXECUTIVES  
OF  
GMO-Z COM SECURITIES (THAILAND) PUBLIC COMPANY LIMITED**

---

For the purpose of cooperating with corporate governance in securities business and to comply with any regulations issued by the Securities and Exchange Commission and/or The Office of the Securities and Exchange Commission (collectively referred to as "the Office of SEC") which prohibited any Securities company to appoint any person who is lacking in ethic and code of conduct to be or to perform the duty of Executive of the Securities company, the Company would like to notify the Ethics and code of conduct of the Executive as follow;

"Securities company"	means i) any company licensed to undertake securities business and ii) any company licensed to undertake the Futures Agent business in the Futures Exchange.
"Executives"	means director, manager or a person with power of management.
"Person with power of management"	means management directors, deputy manager, assistant manager and vice president including any person appointed to undertake equivalent position who performs securities service, operation, research or other similar job function.
"Management director"	means any person appointed by the board of director to perform the management duty on behalf of the board of director.
"Vice president"	means any person appointed to perform the duty of department head.
"Compliance entity"	means The Stock Exchange of Thailand, securities trading center and any organization accepted by the Office of SEC to be a compliance entity.

**1. Honest Professional conduct**

Executives must honestly perform its duty with justice and fair basis to its Major shareholders, shareholder, Employee, Clients and or its Creditors including the avoidance of malpractice on unfairness threatening the well being or the Employee's career stability.

**2. Maintenance of product or service to be provided to Client.**

Executives shall provide the Client's with product and service with conformed quality including the disclosure of information of service with accuracy without distortion.

**3. Adherence to rule and regulations**

Executives must strictly follow all laws, any rule and regulation issue by the Compliance units or any Compliance entity including the Company's Code of conduct.

**4. Due care management**

Executives must manage with due care by fully using their knowledge and shall not be careless and reckless.

**5. No concealment of wrongful act**

Executives shall not conceal or assist or encourage any concealment of any violation of any rule and regulation issue by the Compliance unit or other Compliance entity commit by Executive his/herself, the Company and others.

**6. No utilization of inside information**

Executives shall not utilize the inside information for self beneficial interest or for other with wrongful intent and Executives shall acts as follow:

6.1 Disallow the Executives on the sale and purchase of Company's stock 1 month prior to the submission of the Company's financial statement until 1 day subsequent to its public announcement.

6.2 In a case where Executive performed sale and purchase of Company's stock, report

must be made in accordance to section 59 under the Securities Act to the SEC.

6.3 Chief Executives Officer shall report to the Board of directors concerning the Executive's shares holding when it is changed.

6.4 The Company has announced its policy and operation practice to its employee with constant follow up from time to time.

**7. No Creation of conflicts of interest**

Executives shall not seek or create any self beneficial interest or for and on behalf of the Company

**8. No Executives shall find unlawful gains**

Executives shall not find or dishonestly convert of unlawful gains for their own interest, other Securities Companies or other persons by virtue of his office or position.

**9. Confidentiality**

Executive shall keep confidential all Client's information except by Client's consent or required by law or for the purpose of investigation or court's proceeding

**10. Client's Complaint**

Executives are obliged to make arrangement on the channel for Client to make complaint and the Executive shall on best effort basis encourage on prompt feedback.

**11. Cooperation with concerned units**

Executives must support full cooperation with Compliance unit and/or Compliance entity and must report on any violation of rule and regulation known by the executive to the above units or entity including the allowance for the Employer to make complaint of any rules and regulations.

**Revision History**

Date	Guideline No.	Status	Details of Revision
4 September 2017	016/2017	Cancelled	-
21 March 2022	009/2022	Effective	- Changing Company name

Effective from 21 March 2022 onwards

x 

Mr. Prakrit Thanwalai  
Chief Executive Officer and Authorized Director