

Declaration no. 004/2023

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

1. Principles

1.1 Duty of loyalty

The Company shall always act honestly and uphold the principle of equality when carrying out our duties

1.2 Accountability

Always treat others in a courteous and professional manner.

1.3 General business practice

The Company shall strictly abide by all laws and regulations concerning the securities business

1.4 Client's information

The Company shall obtain adequate information for Client investment and for its benefit.

1.5 Information for Client

The Company will always act for the Client's benefit and provide them with complete and accurate information.

1.6 Conflict of interest

The Company has a responsibility to avoid any situation that would result in a conflict of interest or the appearance of a conflict of interest and the Company shall refrain from seeking any benefit from its Client.

1.7 Preserve Client's asset

The Company has a duty and responsibility to segregate Client and Company's asset and protect them from any damage and able to identify the owner of each assets.

1.8 Financial stability

The Company is certain that the financial status of the Company is sound and able to withstand liability or any potential risk that might cause by the conduct of it business.

1.9 Structure and internal control

The Company shall possess a business structure for the purpose management efficiency and internal control including the process of recruiting in order to seek appropriate candidate to facilitate the business.

1.10 Mutual business's interest

The Company will support any activities that increase overall understanding and cooperation among its business group.

1.11 Business relation (Courtesy and respect)

The Company shall refrain from any verbal abuse may nonetheless create an atmosphere of hostility or intimidation among the business group.

1.12 Relation with Regulatory Institution

The Company shall openly render full cooperation with the Regulatory Institution and shall immediately notify them with any information required.

2. Core Rules

2.1 Independence

2.1.1 Remuneration from the duty

The Company shall take appropriate measures to prevent Company or Company's representative for promising to give or giving or requesting or receiving of any remuneration which will create the conflict from the duty that Company or employee or Company's representative shall have with Clients for operating business.

2.1.2 Significance material interest

Company shall not provide the recommendation or dealing the securities transaction and/ or derivatives with Client, in case Company has a significance material interest or the relationship which will be cause of the conflict of interest, unless Company has disclosed of such facts and also take appropriate measures in order to create the fairness practice to Client.

2.1.3 Other remunerations

Company shall not engage in any activity, having the agreement to pay for other remunerations apart from the normal remuneration.

2.2 Providing the recommendation for the investment and the distribution of information

2.2.1 Precise and Fair communication on providing information

Communicating with anybody to propose the Company's services, Company shall perform based on the principle together with the precise and fairness. Communicating with Client and might be in the form of the agreement, notifying or written announcement, Company shall provide with precise and fairness of data or document.

2.2.2 Client's understanding

Providing recommendation for making decision about securities trading and/ or derivatives to Client, Company shall perform to make understanding regarding the possibility of the risk with Client.

2.2.3 Company's profile

Company shall engage in appropriate measures to let the Clients acknowledge about Company's profile in a certain level, including, Company's business, address, business status, employees and business unit which Clients must connect with, as well as, the Company's business supervision unit.

2.2.4 Information of Securities Bonds and investment

Company shall provide the sufficient knowledge and information as well as the recommendation for the investment in the newly released of securities or bonds, to Clients and be able to use as the composition for their consideration prior to trade of such securities and/ or derivatives or bonds.

2.2.5 Recommendation and the distribution of information

1. Recommendation, presentation of information or the distribution of information for the purpose of the investment in any securities or derivatives, Company shall engage with knowledge, appropriate proficiency based on reasonable principle, as well as, and be able to differentiate the information between facts and opinions as derived from spreading out of such information with fairness and refrain from the misunderstanding.
2. In case of presentation of information or having obtained an approval for the distribution of any securities information or derivatives, Company shall specify by using Company's name itself, to perform of such act and also shall specify the source of information: operator or organizer of such information and supervision unit.
3. Company shall comply with the Company's commitment for providing services to Clients with fairness by:
 - a) Providing recommendation and fundamental knowledge to make the decision for the investment of Clients, such as, the principle to consider for making decision of securities trading, knowledge about the type of securities and derivatives for example.
 - b) Notifying the amendment of the crucial information in the recommendation regarding with the investment, which Company used to represent earlier.
 - c) No Company shall guarantee of both verbal and in writing form which means to guarantee the benefit from the investment to Clients.

2.3 Client's relationship

2.3.1 Undertaking with Client

Any undertaking or juristic act, the Client must be well informed of the details of the services to be provide by the Company.

2.3.2 Responsibility to Client

The Company shall not by undertaking or agreement to relief or limit its liability to its Client under the law or Regulatory body's regulation

2.4 Sale and Purchase transaction for Clients

2.4.1 Purchase order sequence

The Sale and purchase of stock shall be performed on first come first serve basis.

2.4.2 Sale and purchase by order

The Company shall promptly make the sale and purchase transaction upon Client's instruction.

2.4.3 Sale and purchase order prior to distribution of information

In case, the Company intends to distribute any information to the Client. The Company shall not make any prior sale and purchase for its own account until the Clients have prior consideration of such information.

2.4.4 Inappropriate order

The Company must advice the Client to not make any inappropriate sale and purchase order.

2.5 Honesty in conducting of business

2.5.1 Insider trading

- 1) The Company shall not make any sale and purchase of stocks for its own account by utilization of inside information
- 2) The Company shall at all time able to deliver any details to Regulatory body upon request.

2.5.2 Fair and just business's conduct

- 1) The Company shall refrain its employee from the following acts:
 - a) Conduct sale and purchase of securities for itself or other by utilization of Client's account.
 - b) Make any decision on the sale and purchase of securities unless by Client's consent and in accordance to the specify rules and regulations.
 - c) To commit an act of fraud whether solely or jointly with Client on the manipulation of Securities' pricing.
 - d) Create special relationship with Client resulting in Employee's unfair treatment behavior.
- 2) Company shall not manipulate of their own Company's securities or providing cooperation with others to manipulate in the certain securities and/or derivatives or underlying securities of both directly and indirectly.
- 3) Company shall engage with fairness on providing the right to public subscribe of IPO shares
- 4) Company shall refrain from using the unreliable method or fraudulent to manipulate the securities price/ derivatives price, as follows:
 - a) Luring with the aim to create the transaction and/ or derivatives or misleading of such securities price and/or derivatives price by disseminating the news or providing the false statement.
 - b) Trading in the certain securities and/or derivatives with the intention to maintain the price or support the price or speed up or push down the price with the expectation to the price of such securities has not changed which is consistent with the mechanism of market conditions.
 - c) Continuously trading in the certain securities and/or derivatives in the too high price or sell securities and/or derivatives in the too low price with the intention to consequent with the market price.
 - d) Trading in the certain securities and/or derivatives for Clients, with the intention to cooperate with Clients to manipulate the securities price or Company should know that, such transactions are manipulation or suspicious transactions, if Company shall take an interest on or engage with reasonable car

2.6 Management

2.6.1 Adhering to rules and regulations

- 1) The Company must abide by the rule and regulation including the specification of procedure for the Employee to follow, in accordance to his/her responsibilities or obligation under the law.

- 2) The Company shall ensure that the Company possesses an adequate recording and safekeeping of data system including the informing the Authority's officer for auditing purposes.
- 3) The Company shall make arrangement on the channel for Client's complaint. Providing an adequate and prompt remedial action including informing to Client on other alternative to deliver its complaint under the law.
- 4) The Company shall cooperate with the Regulatory Institutions on the investigation of Client's complaint.

2.6.2 Protection of Client's asset

The Company shall safe keep the Client's asset in an appropriate manner by

- 1) Make arrangement on the safe-keeping of Client's asset with a safe and secure manner
- 2) Make registration of Client's stock under the Client's name or other with Client's consent.
- 3) Deposit Client's stocks under its name or under other with Client's consent.
- 4) To segregate Company's assets from Client's asset.

2.6.3 Controlling Client's limit

The Company shall not allow the Client on the sale and purchase of security exceeding its limits granted.

2.6.4 Controlling Client's Collateral

Company shall not allow Clients to trade in derivatives, in case of Client's collateral fall below its value as prescribed by Company. If Clients are not able to maintain the collateral in accordance with the Company's regulation, the Company shall close investment status of Clients as prescribed by regulators.

2.6.5 Client's confidentiality

- 1) The Company shall keep confidential all Clients' information.
- 2) For each business category. The Company shall keep confidential Client's information separately among each business units. No sharing of information among units is allowed.

2.6.6 Business closure

Upon termination of service to be provide to Clients. The Company must proceed with the pending task or transfer to other Company for continuation of process.

Revision History:

Date	Declaration No.	Status	Details of Revision
27 January 2023	004/2023	Effective	-