

Declaration no. 005/2023

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

1. Professional Honestly

The Employee shall act honestly

- 1.1 Shall not use Client or Company's information for self-interest
- 1.2 Shall not solely or jointly with other to engage in a manipulation of Company's share price.
- 1.3 Shall not render cooperation to other which might result in causing Company damages by not disclosing Client's significant data to the Company or encourage Client to open an account under the name of other or
- 1.4 Shall not create or intervene with Client's assets which might cause damage to the Client or the Company
- 1.5 Shall not solely or jointly commit any act against any law or regulations of SET or SEC.

2. Equality of service provided

In providing any information or conduct nay business with Client, the Employee

- 2.1 Shall render advice to Client and act accordingly to Customer order with equality treatment without prejudice.
- 2.2 Shall avoid any unfair treatment causing any damage
- 2.3 Shall provide any information or analysis to all Clients for their utilization without any bias.
- 2.4 Shall not individually favor any Client's which might cause any disadvantage to other Clients.
- 2.5 Shall deliver information to Client in an effective manner
- 2.6 Shall not create any special personal relationship with Client other than the conducting of business or accept any bribery.
- 2.7 Shall not act as a Client's beneficial undertaker even though the Employee has no conflict of interest with Client.
- 2.8 Shall not give any Company's information to Client not under the scope of its duty or responsibility

3. Skill, Impartiality and discretion

- 3.1 The Employees shall have self-reputation, build up group harmony and follow strong moral principles
- 3.2 The Employees shall work effectively and with passion to benefit the Company.
- 3.3 In case of the recommendation regarding securities and/or derivatives, Company shall provide appropriate recommendation to Clients and for the most benefit of Clients with acceptable general principles and can be referred from the references.
- 3.4 In case the Employee are uncertain about his/her behavior. An immediate consultation with his/ her superior is encouraged to avoid any deny of liability by the Employee.
- 3.5 Managers should always prevent any violation of law and the code of conduct.
- 3.6 The Employee shall use its discretion in answering any queries by the any Compliance institution or sharing of information among fellow colleagues to

prevent any damage that may have caused to the Company.

4. General business practice

The Employee shall strictly abide by all laws, including all rules and regulations, Company's policy, SET and SEC code of conduct.

5. Conflict of Interest

The Employee must possess justice behavior and to perform professionally to avoid any situation that would result in a conflict of interest or the appearance of a conflict of interest.

5.1 Client VS Client

5.1.1 The Sale and purchase of stock and /or derivative must be on first come first serve basis

5.1.2 In case any retail or institutional Client prefer to make sale and purchase and/or derivative on the same stocks at the identical price. The Employee must use its discretion on the appropriate pricing.

5.1.3 The distribution of analysis study shall be based on the Client's investment purpose.

5.2 Client VS Employee

5.2.1 The Employee shall not commit an act of front running as follow:

- 1) Knowingly that the Client is purchasing any particular kind of stock
- 2) Above mentioned purchase has caused disadvantage to Client or;
- 3) The Employee or the Company has obtained benefit as the result by the above-mentioned commit of an act;

5.2.2 No recommendation for Client to make frequent sale and purchase transactions for the purpose of commission (Churning);

5.2.3 Company shall not allocate the subscription share more than the Client's demand;

5.2.4 Employees should not subscribe the share which Company is in the position of the guarantee for the distribution.

5.3 Client VS Company

5.3.1 In case the Clients prefer to make sale and purchase of stock identical to Company's intention. The Company must allow the Clients its first right to such sale and purchase.

5.3.2 The Company shall not Front run the Client in making sale and purchase of stocks.

5.3.3 Disclose any information concerning the conflicts of interest for Client's investment decision.

6. Client's information and internal confidentiality (Chinese Wall)

6.1 Employee shall keep confidential the Company and Client's information and not to be reveal which might damage to the Company and Clients.

6.2 Each unit shall possess adequate procedure on the safe custody of the Client's data. Staff of each Company unit shall not reveal any information to staff of the other unit or even within the unit itself.

6.3 In case of any interaction between units. Each unit must possess an adequate procedure to prevent any leakage of such confidential information.

7. Insider Trading

7.1 Insider trading means buying or selling shares or other securities on the basis of price sensitive information, that is not generally available to others. It includes procuring or inducing another person to buy or sell securities about

which insider information is known.

- 7.2 The Employee shall not take advantage from Client by utilizing internal information to benefit the Employee his/herself or others and must notify such occurrence to all concerned parties.

Therefore, for the avoidance of doubt whether or not the information is internal, the Employee shall

- 7.2.1 Notify his/her superior immediately for its superior to make any consultation with the Compliance officer.
7.2.2 Do not disclose any information receipt to other.
7.2.3 Do not utilize the obtained information for self benefit.

8. Others

The Employee has the obligation to acknowledge and understand any rules and regulations applying to the tasks which have been assigned without any deny of such rules and regulation when a wrongful act has been committed.

9. Penalty Provision

For the purpose of all Employees to strictly comply with all applicable laws and regulations issued by the Office of SEC, the Stock Exchange of Thailand including the internally regulation of the Company Re; Best practice in internal control and compliance, the Company has i) notified the code of conduct into the Company's work rules or regulations. Any violation of such code of conduct shall be considered as the violation of the Company's work rules or regulations. In this regard, the Employee who violated the Company's work rules or regulations shall be subjected to any penalty on case by case basis, ii) set up any procedure of penalty consideration.

The Employee who violated any provisions contained in this Ethics and code of conduct shall be liable to the penalty as following;

- 9.1 oral warning
9.2 written warning
9.3 suspension from work without wage payment
9.4 termination of employment with severance pay
9.5 termination of employment without severance pay
9.6 any penalty as per the consideration of Chief Executive Officer

Thus, all penalties shall be considered by the CEO. However, such penalty shall be amended from time to time as per the consideration of the CEO.

Revision History:

Date	Declaration No.	Status	Details of Revision
27 January 2023	005/2023	Effective	-