

Code of Conduct

Principles and Rationale

The Company has established good corporate governance policies to support business operations in alignment with its vision of sustainable growth. It adheres to principles of integrity, ethics, and international standards to guide directors, executives, and employees in conducting themselves appropriately, responsibly, and transparently. The Company has therefore developed a “Code of Conduct” to serve as a guideline for ethical practices and accountability toward all stakeholders.

Definitions

Code of Conduct: Guidelines for proper business practices to be adhered to by directors, executives, and employees

Company: Ornsirin Holding Public Company Limited, including its subsidiaries, associates, entities under its control, and business representatives

Directors: Members of the Board of Directors

Executives: The first four executive levels reporting directly to the Chief Executive Officer

Employees: Personnel at all levels working for the Company

Stakeholders: Individuals, groups, or organizations involved in or affected by the Company’s business operations, including shareholders, directors, executives, employees, customers, business partners, creditors, competitors, government agencies, as well as communities and society

Corruption: The abuse of entrusted power for personal gain, including bribery and misconduct by individuals in public or private sectors who violate their duties for improper benefits

Inside Information:

- 1) Financial information, financial statements, and Company performance
- 2) Information relating to land acquisition, design, and construction
- 3) Information on significant commercial contracts affecting overall performance
- 4) Information related to business management, directors, executives, and employees

(1) Business Conduct

1) Compliance with Laws and Regulations

The Company emphasizes strict compliance with laws, regulations, and requirements of relevant authorities. Directors, executives, and employees must adhere to applicable laws and uphold public order and good morals.

1.1 Adhere strictly to conducting business in compliance with applicable laws, regulations, rules, and the Company’s Code of Conduct

1.2 Conduct business with honesty, integrity, transparency, and fairness, with due consideration for the Company’s best interests

1.3 Regularly study and understand laws, regulations, and policies relevant to one’s roles and responsibilities to prevent unintentional misconduct

1.4 Avoid involvement in or support of any unlawful activities, whether directly or indirectly, including participation in corruption or ignoring improper conduct

1.5 Promote continuous training and knowledge sharing for employees on relevant laws, regulations, and ethical standards to enhance awareness and ensure proper performance of duties

2) Treatment of Shareholders

The Company recognizes the importance of shareholders and is committed to protecting their rights, as well as promoting their ability to exercise such rights as prescribed by law. Directors, executives, and employees must respect shareholders' rights and treat all shareholders equally and fairly. The Company supports shareholders in appropriately exercising their rights through the following practices:

2.1 The Company shall disclose information fairly, transparently, and comprehensively, avoiding selective disclosure or providing inside information to certain shareholders in advance

2.2 Facilitate shareholders in exercising their rights by organizing shareholder meetings in the province where the headquarters is located for convenience, and allowing participation via electronic means as appropriate, with registration, identity verification, and voting systems that are convenient, efficient, and verifiable. In cases where shareholders are unable to attend in person, they may appoint an independent director or another person as proxy using the proxy form attached to the meeting invitation

2.3 Promote shareholders' rights to express opinions by allowing them to raise questions, provide comments, or inquire about meeting agenda items, as well as enabling shareholders to propose agenda items and nominate candidates for directorship in advance in accordance with the specified criteria

2.4 Treat all shareholders equally in matters relating to dividend consideration and other rights

2.5 Provide channels for receiving shareholder feedback beyond the Annual General Meeting, such as investor engagement activities (Opportunity Day), investor relations channels (IR Channel), and electronic feedback channels, to enable shareholders to appropriately express opinions and make inquiries

3) Treatment of Employees

The Company recognizes that employees are valuable resources and the key driving force behind long-term sustainable success. The Company adheres to fair and transparent human resource management principles and respects human rights in all aspects, including fair employment, appropriate compensation, non-discrimination, and the creation of a safe and learning-oriented working environment. In addition, the Company emphasizes continuous employee development and fosters an organizational culture based on integrity, mutual respect, and shared responsibility, with the following practices:

3.1 Treat all employees equally and fairly, with respect for human rights, without discrimination based on race, color, gender, age, religion, marital status, health condition, disability, or political beliefs

3.2 Promote a workplace free from all forms of harassment, intimidation, or abuse

3.3 Provide appropriate compensation, remuneration, and benefits in compliance with labor laws and aligned with industry standards

3.4 Maintain a safe and healthy working environment, and provide employee welfare and benefits such as provident fund, group insurance, annual health check-ups, marriage support, and employee housing privileges

3.5 Encourage employees at all levels to continuously develop their knowledge, skills, and capabilities

3.6 Establish transparent and fair performance evaluation systems, and provide opportunities for career advancement based on merit

3.7 Foster an organizational culture based on transparency, accountability, and professional collaboration, while promoting mutual respect among employees at all levels

3.8 Establish clear, comprehensive, and open internal communication systems to ensure timely and consistent information sharing across all levels

3.9 Support employees in expressing opinions or raising concerns constructively and in good faith, with assurance of protection from retaliation, harassment, or discrimination

3.10 Provide secure and confidential whistleblowing and complaint channels, ensure fair handling, and implement measures to protect whistleblowers from retaliation, harassment, or discrimination. The Company shall investigate complaints transparently and take appropriate and timely corrective actions

4) Treatment of Customers

The Company is committed to developing products, goods, and services, as well as managing customer relationships, to continuously exceed customer expectations. The Company emphasizes ethical treatment of customers, efficient and secure management of customers' personal data, and transparent disclosure of data protection policies and practices to build trust and confidence among customers, with the following practices:

4.1 Treat customers equally and fairly, avoiding all forms of discrimination, particularly those contrary to human rights principles, and promote services that respect customer diversity

4.2 Deliver products, goods, and services in accordance with the Company's quality standards

4.3 Provide accurate, complete, and clear information regarding products and services to enable customers to make well-informed decisions

4.4 Implement strict measures to protect personal data and maintain customer confidentiality in compliance with applicable data protection laws, without misuse of data for personal or third-party benefit or unauthorized disclosure. The Company shall clearly disclose its data protection policies and practices on its website to ensure transparency and customer confidence

4.5 Conduct customer satisfaction surveys before and after ownership transfer, foster strong relationships among residents in all projects, and support customers' social and environmental responsibility initiatives on an ongoing and sustainable basis. The Company shall use survey results to improve products and services, enhance responsiveness to customer needs, and build long-term trust and satisfaction

4.6 Provide channels for receiving customer complaints and feedback to support continuous improvement of products and services. The Company shall consider and incorporate such feedback to enhance its operations in alignment with customer needs

5) Treatment of Creditors

The Company places importance on managing relationships with creditors, including trade creditors and financial institutions, by conducting operations with transparency, fairness, and responsibility to build trust and achieve mutual long-term benefits. The Company strictly complies with the terms and conditions agreed with creditors, including the use of funds, debt repayment, collateral management, and other obligations, with the following practices:

5.1 Disclose financial information accurately and transparently to creditors and stakeholders to enable effective assessment of the Company's repayment capability

5.2 Treat creditors with respect and avoid taking advantage or acting unfairly

5.3 Repay debts in full and on time in accordance with contractual terms and conditions

5.4 Maintain an appropriate debt-to-equity ratio in compliance with requirements set by financial institution creditors

5.5 Communicate regularly with creditors and transparently disclose necessary information regarding the Company's financial position

5.6 Continuously assess debt repayment capability and prepare financial plans to support debt obligations under all circumstances

5.7 Comply with applicable laws related to debt repayment and creditor treatment, as well as good corporate governance standards

5.8 Conduct internal audits to evaluate compliance with creditor conditions and enhance effective debt management

5.9 In the event of financial difficulties or significant impacts on financial status, the Company shall implement appropriate and fair financial solutions for creditors, including considering debt restructuring or extension of repayment terms in line with the situation

6) Treatment of Partners

The Company places importance on conducting business with partners, including contractors, agents, and suppliers, by fostering fair, transparent, and auditable collaboration, alongside mutual capability development and maintaining long-term relationships to promote efficient and sustainable business operations. The Company has established clear procurement policies and guidelines for engaging with business partners, covering ethics, transparency, and shared responsibility across the value chain, with the following practices:

6.1 Select business partners through open, transparent, and non-discriminatory processes, considering their capability for sustainable operations, while adhering to business ethics, avoiding unfair advantage, providing accurate and clear information, and treating partners equally

6.2 Establish fair agreements or contracts based on equity, ensuring fairness across all parties and respecting human rights in accordance with international principles

6.3 Promote mutual development and capability enhancement by supporting the knowledge, skills, and quality development of business partners and related personnel to strengthen the supply chain and promote sustainable business growth

6.4 Strictly comply with agreed terms and conditions and communicate with partners clearly and transparently. In cases where compliance is not possible, the Company shall promptly inform partners to jointly determine appropriate solutions

6.5 Promote ethical practices among business partners, encouraging responsible business conduct, good governance, anti-corruption practices, and respect for human rights throughout all processes

6.6 Provide channels for business partners to submit complaints or feedback, and utilize such information to continuously improve processes and strengthen sustainable relationships

7) Treatment of Competitors

The Company places importance on conducting business within a fair and constructive competitive environment, which is essential for maintaining corporate reputation and promoting sustainable growth in the industry. The Company focuses on enhancing the quality of its products and services to build long-term competitive advantage, with the following practices:

7.1 Operate within generally accepted rules of fair competition

7.2 Cooperate for mutual benefit and to elevate industry standards, such as supporting construction safety standards or overall construction quality, and participating in industry organizations or associations, such as real estate associations, to promote fair regulations and sustainable competition

7.3 Compete fairly by avoiding defamatory actions or providing false information about competitors, and refraining from destructive price-cutting strategies to gain customers in an unsustainable manner

7.4 Focus on value creation and innovation by developing distinctive and unique projects without imitating competitors, and by applying new technologies and innovations, such as Smart Home systems, to enhance value and customer experience, selecting niche locations, or designing projects aligned with target customer needs

7.5 Uphold honesty and transparency in marketing communications by presenting accurate and complete project information, avoiding negative comparisons with competitors, and focusing on highlighting the strengths of the Company's projects

8) Treatment of Business Partners

The Company places importance on building and maintaining relationships with business allies based on trust, transparency, and mutual long-term benefits. Collaboration is conducted ethically, in alignment with good corporate governance principles, and with respect for contractual obligations and applicable laws, with the following practices:

8.1 Conduct collaboration with business allies based on honesty, transparency, and mutual respect

8.2 Strictly comply with agreements, mutual understandings, and business obligations

8.3 Avoid actions that may create conflicts of interest or cause harm to business allies

8.4 Promote responsible exchange of information, knowledge, and technology, with due consideration for intellectual property rights and business confidentiality

8.5 Support collaboration with business allies in alignment with ESG principles and sustainable growth

9) Treatment of Communities and Society

The Company places importance on conducting business with consideration for impacts on surrounding communities and society. It aims to promote quality of life, support local economic development, and contribute to public benefit. The Company believes that sustainable growth can only be achieved when the organization grows in balance with society in an ethical manner. In addition to conducting business with integrity and delivering quality products and services, the Company emphasizes its role in continuous social development and encourages employees at all levels to participate in driving the organization alongside communities and society, with the following practices:

9.1 Conduct business with due consideration for impacts on communities and society, and strictly comply with applicable laws, regulations, and guidelines

9.2 Promote and implement activities that create value for communities, society, and the environment on an ongoing basis, either independently or in collaboration with government agencies, private sector, and civil society

9.3 Foster awareness, communication, and education among employees regarding social responsibility, and encourage participation in public benefit activities

9.4 Respect and consider the way of life, culture, and needs of communities in areas where the Company operates, to ensure alignment with the social context and mutual benefit

9.5 Listen to community feedback, encourage participation, and respond to concerns in a transparent and constructive manner

10) Anti-Corruption

The Company conducts its business with integrity, transparency, and ethical standards, and places great importance on combating all forms of corruption, including offering, accepting, or soliciting bribes, abuse of power, or seeking improper benefits from one's position. To strengthen good corporate governance and align with international standards, the Company has established a clear anti-corruption policy and promotes a corporate culture of integrity and social responsibility. Directors, executives, employees, and all related parties are required to strictly adhere to the following practices:

10.1 Directors, executives, and employees must strictly comply with the Company's anti-corruption policy and are prohibited from engaging in or accepting any form of corruption, directly or indirectly, including giving or receiving money, gifts, entertainment, donations, sponsorships to government agencies, political contributions, or any other benefits for improper advantage

10.2 All departments must implement preventive measures against corruption in alignment with the Company's policy, applicable laws, and practices, including regularly reviewing and improving systems and controls, as well as conducting continuous corruption risk assessments to establish appropriate mitigation measures

10.3 Directors, executives, and employees must not ignore or overlook any suspected corruption related to the Company and must promptly report such incidents to supervisors or responsible persons. In case of uncertainty, they may seek guidance or report through the designated whistleblowing channels

10.4 The Company provides channels for reporting or filing complaints regarding corruption-related misconduct, accessible to both employees and external parties, and ensures protection of whistleblowers and informants in accordance with the Company's confidentiality and protection measures

10.5 The Company has a policy not to demote, penalize, or impose negative consequences on employees who refuse to engage in corruption, even if such refusal results in the loss of business opportunities

10.6 The Company communicates its anti-corruption policy continuously through various channels such as email, the Company's website, announcement boards, and the annual report (56-1 One Report), including clear whistleblowing channels, and provides training on anti-corruption for directors, executives, and employees, including incorporation into new employee orientation programs

10.7 The Company promotes awareness and understanding of anti-corruption practices among external parties, such as business partners and stakeholders, to foster integrity and transparent business conduct

10.8 The Company enforces a “No Gift Policy” during festive seasons or special occasions and clearly communicates this policy to directors, executives, employees, and business partners to ensure transparent and appropriate business practices

11) Conflict of Interest Prevention

The Company places importance on integrity and transparency in conducting business and has established guidelines to prevent conflicts of interest, ensuring that all decisions are made in the best interest of the Company without bias or personal gain. Directors, executives, and employees at all levels must avoid any actions that may result in, or be perceived as, a conflict of interest, whether related to personal, family, or close relationships, and must not use their position for improper personal benefit, with the following practices:

11.1 Perform duties in strict compliance with laws and ethical principles, prioritizing the best interests of the Company and stakeholders, and avoiding personal gain or improper benefit to others

11.2 Avoid entering into transactions involving themselves or related individuals/entities that may create conflicts of interest with the Company, and refrain from influencing, coercing, or controlling others in approving such transactions

11.3 In cases of related-party transactions that do not follow normal commercial terms approved by the Board of Directors, or where the nature and size of the transaction exceed management authority, such transactions must be reviewed and opined by the Audit Committee before submission for approval by the Board of Directors or shareholders, as applicable

11.4 Where related-party transactions are necessary, they must be conducted under normal commercial terms approved by the Board, with transparency and fairness equivalent to transactions with external parties, and in the best interest of the Company. The Company must strictly comply with relevant regulations, notifications, and requirements of the Stock Exchange of Thailand regarding related-party transactions

11.5 Individuals with a vested interest must not participate in the consideration or approval of any transactions in which they have a conflict of interest

12) Confidentiality and Personal Data Protection

The Company places strong importance on maintaining the confidentiality of business-related information and strictly protecting personal data. Directors, executives, and employees at all levels must recognize their responsibility to safeguard confidential information of the Company, as well as data of customers, business partners, shareholders, and other relevant parties, in order to prevent potential damage to the Company and its stakeholders, with the following practices:

12.1 Do not disclose customer information or the Company’s confidential information without consent from the customer or authorized person, except where disclosure is for the Company’s benefit and within the scope of authorized duties

12.2 Do not disclose the Company’s inside information to external parties or unauthorized persons before such information is officially disclosed to the public through the Stock Exchange of Thailand or other designated channels

12.3 Do not use the Company’s inside information for personal gain or to benefit others

12.4 Strictly comply with laws and regulations relating to confidentiality and personal data protection, and upon termination of employment or relationship with the Company, must not use or disclose confidential information without authorization from the Company

13) Anti-Unfair Competition

The Company recognizes that fair competition is a fundamental foundation of an efficient and sustainable market. Unfair competition not only undermines market confidence but also negatively impacts consumers and compliant businesses. Therefore, the Company is committed to conducting business with transparency and fairness, and opposes all forms of unfair competition to maintain market balance and promote a constructive competitive environment, with the following practices:

13.1 Conduct business with honesty and transparency, without using competitors' inside information or inappropriate means to obtain others' business information

13.2 Do not seek competitors' inside information or trade secrets through dishonest, illegal, or unethical means

13.3 Do not damage competitors' reputation through defamation, false accusations, harassment, or distortion of facts

13.4 Comply strictly with trade competition laws and other applicable regulations

13.5 Do not support monopolistic practices or collusion in price fixing, and do not use misleading or deceptive practices to gain unfair competitive advantage

14) Prevention of Insider Information Misuse

The Company recognizes the importance of insider information in strengthening good corporate governance and adheres to principles of integrity, honesty, and business ethics. The Company has therefore established an "Insider Information Policy" to prevent directors, executives, management personnel in accounting or finance at manager level or above (or equivalent), employees, and any other persons who have access to inside information from using undisclosed confidential information for personal or third-party benefit, whether directly or indirectly, and regardless of any compensation, including its use in securities trading. This is to ensure compliance with the regulations of the Securities and Exchange Commission (SEC), the Stock Exchange of Thailand (SET), and other relevant laws, as well as to build confidence among shareholders, investors, and stakeholders that the Company has appropriate, transparent, and auditable governance measures, with the following practices:

14.1 The Company shall provide knowledge to directors and executives regarding their obligations to prepare and submit reports on their securities holdings, including those of their spouse, cohabiting partner, minor children, and juristic persons in which such individuals, their spouse or cohabiting partner, and minor children collectively hold more than 30% of the total voting rights and have the largest shareholding. Such reports must be submitted to the Securities and Exchange Commission (SEC) in accordance with Section 59 and the penalties under Section 275 of the Securities and Exchange Act B.E. 2535 (as amended), as well as reporting the acquisition or disposal of securities in accordance with Section 246 and penalties under Section 298 of the same Act

14.2 Directors and executives, including their spouse or cohabiting partner, minor children, and juristic persons in which such persons collectively hold more than 30% of voting rights and have the largest shareholding, must notify the Company Secretary (as assigned by the Board) at least one day prior to any purchase, sale,

transfer, or acceptance of transfer of securities. They must also prepare and disclose reports on securities holdings and changes in holdings to the SEC within three business days from the transaction date, report such changes to the Board of Directors, and submit initial holdings within 30 days of appointment. Copies of such reports must be provided to the Company on the same date as submission to the SEC. Other persons not defined as directors or executives must report changes in securities holdings to the Company Secretary within three business days from the transaction date

14.3 Directors, executives, and employees who have access to inside information, including their spouse or cohabiting partner, minor children, and related juristic persons holding more than 30 % of voting rights, are prohibited from trading the Company's securities or related derivatives during the period of 30 days prior to the public disclosure of quarterly and annual financial statements, and within 24 hours after such disclosure

14.4 Directors, executives, employees, and any other persons with access to inside information, such as auditors, financial advisors, or legal advisors, must not disclose or use such information for personal or third-party benefit, including trading or recommending securities transactions. Such information must not be disclosed to others who may use it for similar purposes, particularly competitors, whether directly or indirectly and regardless of any benefit received

14.5 Directors, executives, employees, and former personnel must not disclose inside information or confidential Company information, including customer data obtained during their duties, to external parties, even if such disclosure does not result in damage

14.6 Directors, executives, employees, and former personnel must maintain confidentiality of inside information and use it solely for the Company's business purposes, and must not use such information for the benefit of other entities in which they have involvement

14.7 The Company shall prevent misuse of inside information by restricting access to undisclosed information to only relevant and authorized persons, and by implementing appropriate data security measures, with data owners ensuring strict compliance

14.8 Disclosure of information must be made only by authorized personnel. General employees are not authorized to disclose information and must direct inquiries to designated responsible persons to ensure accuracy and consistency

14.9 Any violation of the insider information policy or unauthorized disclosure causing damage to the Company or related parties shall be considered a disciplinary offense, subject to penalties ranging from warning to termination, and may also result in legal action if applicable

15) Environment, Health, Safety, and Working Conditions

The Company recognizes the importance of conducting business in parallel with environmental protection, promoting safety, occupational health, and ensuring a safe and appropriate working environment (Environment, Health, and Safety: EHS) for employees and all related parties. The Company is committed to strictly complying with environmental and safety laws, standards, and requirements, while promoting employee awareness and participation in environmental conservation and workplace safety on a continuous and sustainable basis, with the following practices:

Environmental

15.1 Strictly comply with national environmental quality promotion and conservation laws, as well as other relevant environmental regulations

15.2 Use natural resources and the environment efficiently and responsibly, with consideration for reducing environmental impacts, such as lowering greenhouse gas emissions, reducing energy and electricity consumption, minimizing waste, and promoting sustainable resource use

15.3 Commit to developing and applying environmentally friendly innovations and technologies to deliver products that meet all needs, while creating opportunities for society and supporting shared sustainable growth

15.4 Promote awareness and understanding of environmental and climate importance among employees, customers, business partners, and stakeholders, and support related activities to foster environmental responsibility and sustainable preservation of natural resources for future generations

Occupational Health, Safety, and Working Environment

15.5 Ensure that all operations comply strictly with laws, regulations, standards, practices, and requirements related to safety and occupational health to prevent and reduce risks to employees and stakeholders

15.6 Establish policies and appoint a Safety, Occupational Health, and Working Environment Committee (Safety Committee), including overseeing inspections, risk assessments, and continuous improvement of working conditions

15.7 Promote a safety culture within the organization through regular safety training and annual emergency response drills to enhance employees' knowledge and awareness

15.8 Support continuous improvement of the working environment to ensure it is appropriate, hygienic, convenient, safe, and conducive to employees' physical and mental well-being

15.9 Monitor and safeguard employee health through annual health check-ups and risk-based health assessments, and provide welfare programs that promote employee well-being and quality of life

15.10 Conduct regular inspections and assessments of working conditions at construction sites, emphasizing strict safety and hygiene standards for construction workers, and ensure compliance with safety measures to prevent and reduce risks of accidents and hazards

16) Human Rights

The Company adheres to and complies with the principles of the Universal Declaration of Human Rights and the United Nations Guiding Principles on Business and Human Rights (UNGPs). It emphasizes fair, equal, and non-discriminatory labor practices and respect for human rights in all aspects, including employment, compensation, promotion, training, and employee development, without discrimination based on gender, gender identity, age, educational background, race, or religion. The Company aims to foster a sense of unity and belonging among all personnel and has therefore established a human rights policy and guidelines for internal implementation, with the following practices:

16.1 Respect human rights by treating all stakeholders and vulnerable groups with dignity, respect, and equality, without discrimination based on physical or mental conditions, race, nationality, origin, ethnicity, religion, gender, language, age, skin color, education, social status, culture, customs, or any other factors.

16.2 Exercise due care in performing duties to prevent risks of human rights violations in business operations and prevent all forms of harassment, including sexual and non-sexual harassment. Ornsirin adheres to non-discrimination, anti-harassment, and zero tolerance for all forms of harassment. Complaints will be taken seriously, treated confidentially, and handled with empathy. If allegations are substantiated, appropriate remedies, disciplinary actions, termination, or legal actions will be taken.

16.3 Treat employees fairly and equally, including non-discriminatory compensation practices, ensuring quality of life in accordance with the law, prohibiting child labor and forced labor, supporting legal migrant labor, and promoting occupational health and safety. These requirements apply to all Ornsirin group companies and business partners.

16.4 Respect customer rights by treating customers fairly and protecting their personal data.

16.5 Protect personal data of employees, job applicants, current and former employees by establishing regulations and controlling access and disclosure, including obtaining employee consent for access to personal data and privacy.

16.6 Respect the rights of business partners by treating them fairly, implementing transparent procurement processes to promote fair competition, and encouraging partners to adhere to human rights principles.

16.7 Respect community rights by recognizing community interests, listening to feedback, and promoting community participation.

16.8 Communicate and disseminate this policy, provide education, establish guidelines, and support employees, partners, and value chain businesses to ensure ethical operations and respect for human rights, with regular assessments and training on human rights, discrimination, and workplace harassment.

16.9 Monitor and ensure respect for human rights, and not ignore or overlook any potential violations related to Ornsirin. Such matters must be reported to supervisors or responsible persons, and cooperation must be provided in investigations. Inquiries should be directed through established channels.

16.10 Establish effective and modern whistleblowing and complaint channels, ensuring fairness and protection for individuals reporting human rights violations related to Ornsirin.

16.11 Develop and implement ongoing human rights due diligence processes from the investment stage to identify risks and impacts, define affected stakeholders, establish mitigation and prevention measures, and align with enterprise risk management, including remediation processes where violations occur.

16.12 Commit to building and maintaining an organizational culture that upholds respect for human rights in accordance with this policy.

16.13 Any act of human rights violation, discrimination, or harassment is considered a breach of the Ornsirin Code of Conduct. The Company will take corrective and disciplinary actions in accordance with Company regulations and may pursue legal action if required.

16.14 Commit to communicating, reporting, and disclosing human rights performance, mitigation, remediation, and incidents of discrimination and harassment transparently to the public.

16.15 Regularly review the human rights policy, taking into account significant changes affecting the organization.

17) Information Security and Information Systems

The Company recognizes the importance of safeguarding data and information systems to reduce risks from cyber threats, system failures, and potential impacts on business operations, trade secrets, and stakeholder confidence. To ensure data security and business continuity, the Company has established a structured information security management system, with the following practices:

17.1 Promote employee participation at all levels in fostering a data security culture, emphasizing the importance of reporting irregularities and strict compliance with information security policies

17.2 Implement security systems (e.g., firewall) and ensure regular backups of critical data in both primary systems (DC-SITE) and backup systems (DR-SITE) to support business continuity

17.3 Conduct regular cybersecurity incident response drills and system recovery exercises annually to enable timely response and minimize disruption impacts

17.4 Strictly control access to data and systems through authentication measures, role-based access controls, and restrictions for unauthorized users

17.5 Comply strictly with applicable laws and regulations related to information security to ensure operations align with international standards and legal requirements

17.6 Regularly monitor and evaluate the effectiveness of information systems and security measures, including continuous testing of backup systems

17.7 Systematically store and classify critical data, such as project plans, customer data, and financial information, to prevent data loss and support business continuity

17.8 Prohibit the use of the Company's data or information technology in any unlawful, unethical, or harmful manner to individuals, businesses, or society, including any actions that may damage the Company's reputation or negatively impact stakeholders

18) Intellectual Property

The Company places importance on respecting and protecting all forms of intellectual property, including trademarks, copyrights, patents, trade secrets, technical data, software, key documents, and innovations. These are regarded as valuable assets and key factors in enhancing the Company's competitiveness and credibility. The guidelines are as follows:

18.1 All employees must protect and safeguard the Company's intellectual property from unauthorized use or disclosure

18.2 The use of the Company's intellectual property for personal gain or for the benefit of others is strictly prohibited, both during employment and after termination

18.3 Any disclosure of information related to the Company's intellectual property must be approved in advance and properly referenced

18.4 Creative works such as innovations, discoveries, or academic outputs developed during the course of employment by employees, staff, or contractors shall be deemed the rightful property of the Company

18.5 Any suspected or actual intellectual property infringement must be reported immediately to supervisors or relevant departments

18.6 The Company encourages and supports employees to utilize their knowledge and capabilities in research, development, and innovation, without infringing upon the intellectual property rights of others

19) Innovation Development

The Company recognizes the importance of innovation in creating business value, while also contributing benefits to customers, stakeholders, society, and the environment. Therefore, the Company has established the following guidelines to promote continuous innovation development:

19.1 Encourage employees to express ideas and propose new concepts that can be developed into practical innovations for the Company

19.2 Identify and adopt appropriate innovations or technologies to enhance internal management and real estate project operations, improving efficiency and quality

19.3 Develop environmentally friendly innovations that support efficient resource utilization and align with sustainable development principles

19.4 Promote knowledge and skills in innovation and technology among employees to enhance work quality and strengthen the Company's competitiveness

(2) Code of Conduct for Directors

The Company places great importance on good corporate governance, recognizing that the Board of Directors plays a critical role in driving the organization toward transparent, fair, and sustainable growth. Directors must perform their duties with responsibility, prudence, and integrity, in compliance with the Public Limited Companies Act B.E. 2535, the Securities and Exchange Act B.E. 2535, and other relevant laws. This is to enhance credibility and build confidence among all stakeholders. Therefore, the Company has established a Code of Conduct for Directors to be strictly observed and to serve as a role model for executives and employees. The guidelines are as follows:

1) Perform duties with honesty, integrity, and transparency for the best interests of the Company and all stakeholders, while ensuring that the Company's operations comply with applicable laws, regulations, and government requirements. Directors shall perform their roles as defined by the organization, including acknowledging and considering complaints or whistleblowing reports regarding misconduct

2) Not hold directorship positions in competing businesses, and not use their position for personal gain or for the benefit of others. Directors must strictly separate personal interests from those of the Company

3) Maintain the confidentiality of the Company's internal information during and after their tenure. Directors must not use inside information for personal gain or disclose it to unauthorized persons

4) Not accept gifts, offers, or any benefits that may lead to conflicts of interest or affect their judgment in performing their duties

5) Oversee that the Company operates ethically and fairly, and promote effective internal control systems, risk management, and audit mechanisms

6) Act as a role model for executives and employees by strictly adhering to the principles of good governance and the Company's Code of Conduct

(3) Code of Conduct for Executives

The Company recognizes the important role of executives as organizational leaders responsible for setting direction and driving the Company toward sustainable success through vision, knowledge, capability, and ethical values. Executives must uphold accountability, integrity, and transparency in performing their duties, while

promoting innovation, efficient resource management, prevention of conflicts of interest, protection of confidential information, and building trust among all stakeholders. Executives are also expected to identify new business opportunities to support continuous and sustainable growth, and to serve as role models for employees. The guidelines are as follows:

- 1) Perform duties with honesty, integrity, and transparency, taking into account the best interests of the Company and all stakeholders
- 2) Perform duties in strict compliance with laws, regulations, rules, and the Company's policies to ensure transparency and credibility
- 3) Disclose information accurately and transparently, ensuring communication with shareholders, regulators, and the public is complete, accurate, timely, and not misleading
- 4) Prevent and manage conflicts of interest in a transparent and fair manner, avoiding decisions that may lead to conflicts of interest and not using position for personal gain
- 5) Manage risks and business opportunities prudently, covering strategic planning, business operations, budgeting, performance reporting, and transparent disclosure to stakeholders
- 6) Avoid accepting gifts, offers, or any other benefits that may affect impartiality in performing duties, and promote similar practices among employees
- 7) Promote learning, employee development, and a safe working environment to support sustainable organizational growth
- 8) Treat employees at all levels with respect, and refrain from misconduct, intimidation, or any actions that undermine employee dignity
- 9) Conduct themselves professionally with integrity, responsibility, and ethical standards, and foster a strong corporate culture by consistently acting as role models and complying with the Company's rules and regulations

(4) Code of Conduct for Employees

The Company recognizes the important role of employees as key drivers in achieving sustainable organizational success. All employees are therefore required to uphold integrity, accountability, and transparency in their work, including adherence to ethical principles, moral standards, and applicable laws. This is to strengthen a solid corporate culture and build trust among all stakeholders. The guidelines are as follows:

- 1) Perform duties with honesty, integrity, and transparency, prioritizing the best interests of the Company and its stakeholders
- 2) Carry out assigned tasks with responsibility and discipline, and encourage colleagues to uphold the Company's Code of Conduct, fostering a strong and sustainable ethical culture
- 3) Comply strictly with laws, regulations, rules, and the Company's policies
- 4) Respect supervisors and colleagues at all levels, and refrain from misconduct, intimidation, disrespect, or retaliatory actions in cases of conflict
- 5) Respect differing opinions, diversity, and decisions of colleagues and supervisors
- 6) Avoid conflicts of interest, and not use position or internal information for personal gain or the benefit of others. Any potential conflict must be reported immediately

7) Maintain the confidentiality of the Company's information and prevent any unauthorized disclosure or misuse

8) Use the Company's resources responsibly for work-related purposes only, and not for personal benefit

9) Continuously develop personal capabilities by enhancing knowledge, skills, and adaptability to improve work efficiency and contribute to the Company's growth

10) Report any inappropriate behavior, misconduct, or potential corruption, including any disregard of the Code of Conduct, through supervisors or designated reporting channels in a transparent manner and with protection from retaliation

(5) Whistleblowing and Complaint Channels

If any incident or behavior that may constitute corruption, misconduct, violation of laws, regulations, rules, the Company's Code of Conduct, or Company policies is observed, including cases where individuals are affected by the Company's business operations or inappropriate conduct of directors, executives, or employees, such matters can be reported to the Company. Whistleblowers may choose to disclose their identity or remain anonymous.

The whistleblower is required to provide complete and clear details, including the subject of the complaint or report, the name or position of the accused person, description of the misconduct, date and time of the incident, as well as the name, address, and contact number of the whistleblower (if disclosure is intended), to enable the Company to follow up and conduct a thorough investigation. Reports can be submitted through any of the following channels:

1) Email: whistleblower@ornsirin.co.th

2) Company website: www.ornsirin.co.th under the "Contact Us" section

3) Sealed mail addressed to one of the designated recipients:

Company Secretary or Assistant Company Secretary

Ornsirin Holding Public Company Limited

79 Moo 8, San Pu Loei Subdistrict

Doi Saket District, Chiang Mai 50200

4) Whistleblowing and complaint box located at the Company's head office (accessible only by the Company Secretary or Assistant Company Secretary)

(6) Protection Measures for Complainants, Whistleblowers, and Persons Cooperating in Investigations

1) Complainants, whistleblowers, or persons cooperating in fact-finding investigations may choose to remain anonymous if disclosure may result in insecurity or potential harm. However, disclosure of identity may facilitate more effective and timely communication, progress updates, clarification of facts, and mitigation of damages

2) The Company shall keep all information that may identify the complainant, whistleblower, or cooperating person strictly confidential. This includes name, address, contact details, photographs, or any other identifiable information, unless disclosure is required by law or consent has been obtained in writing

3) In cases where disclosure of information is necessary for the benefit of an investigation, the Company shall limit such disclosure strictly to what is necessary, taking into account the safety and potential impact on the complainant, whistleblower, or cooperating person

4) If the complainant, whistleblower, or cooperating person believes that they may face insecurity or potential harm as a result of their involvement, they may request appropriate protection measures from the Company. The Company may also provide such protection proactively if it deems there is a potential risk of harm or insecurity

5) Any person who suffers damage shall be provided with appropriate and fair remedies

6) The Company shall not take any retaliatory actions, discrimination, harassment, or unfair treatment against complainants, whistleblowers, or cooperating persons. This includes, but is not limited to, changes in position, job responsibilities, workplace location, suspension, threats, intimidation, interference with work performance, termination of employment, or any other unfair treatment

(7) Handling of Violations of the Code of Conduct

The Company considers the Code of Conduct as an integral part of work discipline. All directors, executives, and employees are required to strictly comply with it. Any violation, negligence, omission, or intentional non-compliance shall be deemed a disciplinary offense, and the Company will impose appropriate disciplinary actions in accordance with its regulations. In cases where such actions constitute a violation of law, the Company will pursue legal action accordingly.

In the event of a violation of the Code of Conduct, the Company will conduct a systematic root cause analysis and establish corrective and preventive measures to avoid recurrence, including:

- Reviewing and improving related policies or guidelines to ensure greater clarity
- Organizing training or seminars to continuously enhance knowledge, understanding, and awareness of ethical standards
- Strengthening internal communication to ensure effectiveness and organization-wide awareness
- Improving internal control processes and whistleblowing channels to enhance efficiency
- Monitoring post-incident actions to assess the risk of recurrence and reinforce a culture of ethics and compliance
- Reviewing operational processes across relevant functions to identify gaps and implement improvements to prevent recurrence

(8) Monitoring Compliance with the Code of Conduct

The Company requires all directors, executives, and employees at all levels to acknowledge, understand, and strictly comply with the policies and guidelines set forth in the Code of Conduct. The Company will continuously monitor and evaluate compliance to ensure that operations align with good corporate governance principles and maintain stakeholder confidence on a sustainable basis. The results of compliance with the Code of Conduct will be reported to the Board of Directors or the designated sub-committee on an annual basis.

Effective from 1 December 2025 onward.