






TCP Group

Code of Conduct

(NOVEMBER 2024)

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CEO Message

TCP Group has a long and successful business history. Throughout our growth, we have prioritized sustainability for our customers, business partners, communities, society, and the environment, as well as the well-being of our employees. We consistently uphold honesty, integrity, and ethics as core values in every aspect of our work.

TCP Group has established a code of conduct and an anti-corruption policy, providing clear guidelines for all employees to follow.

All employees are required to thoroughly review this manual carefully and apply their judgment in accordance with the principles outlined in TCP Group's code of conduct. By doing so, we can maintain our strong reputation, foster trust and confidence, and continue to positively impact on our customers, consumers, communities, government, and society. We are dedicated to driving positive change, empowering people to reach their goals, and contribute to make a better world for all.



Saravoot Yoovidhya
Chief Executive Officer

Definition

TCP Group Code of Conduct

This refers to the code of conduct that sets out the principles and values that guide TCP Group's business operations.

TCP Group

This refers to the following companies:

T.C. Pharmaceutical Industries Co., Ltd.

The Red Bull Beverage Co., Ltd.

T.G. Vending and Showcase Industries Co., Ltd.

Durbell Co., Ltd.

Hi-Gear Co., Ltd.

its subsidiaries.

Subsidiary

This refers to any organization or legal entity in which shareholders of TCP Group hold at least 51% of the shares, or where shareholders of TCP Group have the authority to operate or manage that organization.

Director

This refers to a member of the board of directors of TCP Group or its subsidiaries.

Employee

This refers to a person who is employed by TCP Group or its subsidiaries.

Representative

This refers to a person who is authorized to act on behalf of TCP Group.

Contractor

This refers to a person or company that provides goods or services to TCP Group.

Business Partner

This refers to any person or company that has a business relationship with TCP Group.

Scope of application

Directors, executives, managers, and employees of TCP Group



Purpose

With the inception of owning a global energy drink brand, TCP Group is committed to energizing and refreshing millions of people worldwide at every moment through our diverse range of beverages and services, while simultaneously striving to make the world a better place for us all.



Fulfilling

Fulfilling : Meeting consumer and partner needs with quality products and services;



Growing

Growing : Creating value for our brands and for our partners throughout the value chain; and



Caring

Caring : Caring for society and environment through sustainable practices in everything we do.

Corporate Culture



Proactive: We are proactive in our work, always looking for new opportunities and challenges;

Positive: We have a positive attitude and are open to new ideas and feedback; and

Supercharged: We give our all in everything we do.

1.Code of Conduct of TCP Group

1.1 Employee conduct

TCP Group expects all employees to conduct themselves with professionalism in an ethical manner. Employees are expected to:

- Perform their duties with responsibility, honesty, integrity, and dedication.
- Comply with all company rules, regulations, and policies.
- Conduct themselves in a manner that is appropriate for their role, responsibilities, and situation.
- Refrain from making disparaging remarks or engaging in any behavior that may cause division or harm the reputation of TCP Group, employees, directors, shareholders, contractors, business partners, or stakeholders.
- Refrain from using one's position or authority for personal gain, whether directly or indirectly.
- Encourage unity and collaboration among employees while fostering a culture of mutual support.
- Actively pursue continuous learning and skills development.
- Treat others (customers, contractors, business partners, and stakeholders) with the same respect that one would like to be treated.



1.2 Data and property protection

Employees of TCP Group with access to confidential business information are required to maintain its confidentiality. Disclosure of such information to unauthorized employees or third parties is strictly prohibited unless prior authorization is obtained from the CEO. Furthermore, employees are forbidden from engaging in any actions that could harm the company, both during their employment and after its termination, except where such actions are legally permissible.

Confidential business information is defined as any information that is related to TCP Group's business, regardless of its form. This includes the following:



1.2.1 Technical information, such as research and development, product formulas, product ingredients, production techniques, production processes, business plans and procedures, computer programs, machinery used in production, inventions, know-how, packaging designs, and test results or changes related to the above items.



1.2.2 Business and/or financial information, including but not limited to employee records and duties, employee headcount, operating expenses, procurement information, prices, profits, marketing and sales data, customer lists, lists of suppliers of raw materials, machinery, tools, equipment, or other services to TCP Group.



1.2.3 Information about business projects, including but not limited to information about expanding production lines, marketing plans, product distribution, products to be produced in the future, product research results, marketing research results, consumer research results, other research results, and information about improving such projects or plans.



1.2.4 Information about third parties that TCP Group is obligated under any contract or by law to keep confidential.



1.2.5 Other information that TCP Group has not disclosed to the public. If an employee invents any invention during their employment with TCP Group, or if the employee's work results in any intellectual property, whether it has been registered under intellectual property laws (hereinafter referred to as "intellectual property"), the employee agrees to assign the intellectual property to TCP Group and will not disclose any information about the intellectual property without the prior authorization of the company.

Employees are responsible for using TCP Group property in accordance with the policies that TCP Group has established. Employees must also ensure that TCP Group property is not used for personal or non-business purposes, and that it is not damaged or lost. TCP Group property includes both tangible property (such as cars, office equipment, tools, machinery, etc.) and intangible property (such as intellectual property).

1.3 Data accuracy

In a competitive business environment, it is essential that directors, shareholders, and other stakeholders receive accurate, complete, and timely information about TCP Group's operations. Therefore, TCP Group expects all employees to carry out their duties using precise and comprehensive data, ensuring that any analysis or reports presented are accurate and delivered promptly.

Employees responsible for collecting and recording data such as accounting entries, expense reports, timesheets, customer records, revenue reports, financial statements, and investment data must perform their duties with accuracy, transparency, and in strict compliance with TCP Group policies, accounting standards, and applicable laws.



1.4 Use of data

Employees are responsible for keeping all confidential information that they receive about TCP Group's operations. It is prohibited to disclose such information to unauthorized individuals.

Only employees who have been authorized to access confidential business information are entitled to access TCP Group's confidential business files, whether they are stored in computer files or in other forms. Unauthorized employees are strictly prohibited from viewing, duplicating, copying, publishing, deleting, destroying, or changing such information. Additionally, employees must not change passwords or engage in any actions that could potentially harm TCP Group.



1.5 Abuse

TCP Group is dedicated to fostering a positive working environment that promotes efficiency and upholds ethical standards. Should the company receive reports of any violations or misconduct, a thorough investigation will be conducted. If a violation is confirmed, appropriate disciplinary action will be taken against the employees involved. Violations cover the following actions:

1.5.1 Verbal violation



Refers to the use of improper language, use of offensive words to create sexual feelings or speaking in a way that makes the affected party uncomfortable, include criticizing someone’s appearance, facial features, clothing, engaging in vulgar language, or using provocative language that stimulates sexual feelings. Talking about others in a derogatory manner, spreading false information, belittling, or damaging someone’s reputation are also considered verbal violations.



1.5.2 Physical violation

Threats or physical harm.



1.5.3 Financial violation

Force subordinates to buy products or services, or compel subordinates to borrow money whether indirectly or directly.

1.5.4 Sexual violation

Refers to behavior that violates the rights of others in sexual matters, without consent or willingness, this includes:

1) Non-explicit sexual violation

Refers to sexual violation through some actions such as using gestures, eye contact, and inappropriate body movements even sending sexually suggestive messages or pornographic videos that convey sexual harassment.

2) Explicit sexual violation

Refers to clear acts of sexual violation, such as direct physical contact for example, undesired touching, sitting, standing, or walking too closely, inappropriate body language, touching clothing or the body, and actions such as hugging, kissing, groping, or any other actions that involve explicit sexual intent towards the person being violated.



2. Conduct towards external stakeholders of TCP Group

2.1 Expressing opinions and providing information to external parties or media

Any expressions of opinions or sharing of information with external individuals or the mass media must be approved by the company or its designated representatives. Employees who express opinions or disclose confidential business information belonging to TCP Group without prior approval will face serious disciplinary consequences in accordance with TCP Group regulations, and may also be subject to legal action.



2.2 Business competition

TCP Group is dedicated to conducting business with transparency and fairness towards all business partners and entrepreneurs. This commitment is grounded in ethical business practices, and the Group adheres to competition laws in Thailand and in all countries where it operates.

2.3 Other works or external activities

Employees are prohibited from working for other companies or individuals during their regular working hours at TCP Group. If employees choose to engage in outside employment, it must not involve a business that competes with TCP Group. Furthermore, employees must notify the highest supervisory authority within the organization if such outside activities could potentially create a conflict of interest.

When engaging in external activities, employees must ensure that their performance at TCP Group is not affected. Additionally, involvement in any dishonest or unethical business activities that could compromise the integrity of TCP Group is strictly forbidden. This includes, but is not limited to, businesses related to massage parlors, entertainment establishments, unauthorized money lending, or any activities associated with substance abuse or public deception.



2.4 Transactions with the state

Employees must refrain from any actions that could encourage government officials to engage in unethical behavior. However, it is acceptable to build knowledge and foster positive relationships within reasonable boundaries. For instance, meeting in public places, extending congratulations during celebrations or festivals, and participating in customary practices are permissible as long as they remain within appropriate limits.

2.5 Transactions between TCP Group and external parties

TCP Group is committed to conducting transactions with external individuals, including private individuals, legal entities, and other business organizations, in a fair and transparent manner that aligns with agreed-upon terms. The group will uphold ethical practices and avoid engaging in transactions that may cause harm to external parties.



3. Governance and social responsibility

3.1 Conflict of interest

A conflict of interest occurs when an employee's personal interests clash with those of TCP Group. Employees must avoid engaging in private financial transactions, business dealings, or other activities that could compromise the interests of TCP Group, as these actions may lead to financial losses or affect their ability to make independent decisions in fulfilling their company responsibilities. Employees are expected to prioritize the interests of TCP Group, ensuring compliance with applicable laws and ethical standards.

If an employee or a family member receives direct or indirect benefits that may conflict with the interests of TCP Group, the employee must promptly notify their supervisor. Additionally, the employee should refrain from participating in any decisions related to those benefits.



3.2 Anti-corruption

TCP Group is committed to conducting business transparently, ethically, and responsibly, ensuring benefits for all stakeholders in line with good corporate governance principles.

All employees are expected to act in accordance with relevant laws and regulations, adhering to the TCP Group's "Anti-Corruption Policy". This policy provides clear guideline for sustainable business development, outlining responsibilities practices, and procedures to prevent corruption in all business activities. It emphasizes the importance of thorough consideration and compliance with anti-corruption measures in any business decisions that may present a risk of corruption.

Executives, directors, managers, and employees are strictly prohibited from misusing their authority for personal gain. Accepting or offering any gifts, contracts, promises, demands, or receiving money, assets or any inappropriate benefits from government officials, public organizations (domestical and international), non-governmental organizations, or individuals in positions of responsibility-whether directly or indirectly-is forbidden. Such actions aimed at inducing or preventing actions that could benefit or maintain business relationships with TCP Group are not tolerated. Facilitating inappropriate business-related benefits for oneself or associates is considered a violation, reflecting improper practices that could lead to gains in the course of duty.

3.3 Receiving gifts, presents, property, or other benefits and business entertainment

3.3.1 Employees should avoid giving or receiving rewards, gifts, property, or any other benefits-whether monetary and non-monetary-from business partners of TCP Group or individuals engaged by the company. Exceptions may be made during festivals, providing the gifts are of reasonable values and do not create a business commitment, whether with current or potential partners.

3.3.2 Employees should refrain from giving or receiving business entertainment that exceeds normal transactions with individuals engaged by TCP Group, unless it aligns with customary business practices. If avoiding such entertainment is not feasible, employees must obtain written approval from the highest-ranking authority in their department before accepting it. If advance notice is not possible, employees must inform their supervisor in writing as soon as possible. Request for approval or notification can be submitted via email, ensuring that both the sender's and recipient's addresses are affiliated with TCP Group.



3.3.3 In cases where it is necessary to receive gifts or rewards with a value higher than the normal limit (starting from 1,000 Baht), employees must inform the highest-ranking authority in the department and deliver the gifts or rewards to TCP Group through the Human Resources and Administration Department for further management. This excludes fresh food and small-value items such as diaries, stationery, calendars, etc.

Human Resources and Administration Department will manage the gifts as follows:

1) Gifts received during the New Year celebrations will be raffled among employees during TCP Group's New Year party.

2) Gifts received during other festivals will be raffled to various departments for distribution to employees.



3.4 Interaction with consumers, business partners, society, and community

3.4.1 Interaction with consumers

TCP Group is committed to maximizing customer satisfaction by offering high-quality products and services at fair prices while demonstrating a strong sense of responsibility towards consumers.

3.4.3 Interaction with trade competitors

TCP Group adheres to guidelines for fair and transparent competition. This includes avoiding the unfair use of market power, refraining from agreements with competitors or any parties that could restrict, reduce, or limit trade competition. Additionally, the group commits to not seek confidential information from competitors through malicious actions, including false accusation or attacks.

3.4.2 Interaction with business partners

TCP Group is committed to fostering strong relationships with business partners by operating on principles of mutual fairness, consistent practices, and strict adherence to contracts, all while avoiding conflicts of interest to ensure mutual benefits.

3.4.4 Interaction with society and the community

TCP Group prioritized compliance with various safety, security, health, and environment standards, taking into account the impact on natural resources and the environment.

4. Respect for Human Rights

4.1 Universal human rights

TCP Group is committed to upholding the law and respecting human rights principles by integrating the values outlined in the Universal Declaration of Human Rights (UDHR), the United Nations Guiding Principles on Business and Human Rights (UNGPR), the International Bill of Human Rights, and the International Labor Organization Declaration on Fundamental Principles and Rights at Work (ILO) into its business operations. This commitment aims to prevent human rights violations among all stakeholders in TCP Group's value chain.



4.2 Organizational, social, and community human rights

TCP Group upholds the principles of human rights and equality by treating employees, stakeholders, and communities fairly, without discrimination based on physical or mental characteristics, race, nationality, religion, gender, age, education, or other factors. The group is committed to promoting gender equality and respecting diversity in gender identity, sexual orientation, and expression, while actively preventing and addressing sexual harassment and all forms of discrimination

TCP Group respects the rights to freedom of expression and values the opinions of the community, particularly those of vulnerable groups, minorities, ethnic groups, and indigenous peoples. Business operations are conducted with consideration of their potential impact on the economy, natural resources, environmental quality, ecosystems, culture, society, lifestyle, health, safety, privacy, and other human rights issues affecting community members.

In community-related activities, TCP Group adheres to transparent, equitable, and legal processes, ensuring non-discrimination. The group supports community's access to clean, safe, and sufficient water, and advocates for the community's right to clean air. Additionally, TCP Group provides social security and welfare for employees as required by law, including rest periods, paid annual leave, and the right to participate in cultural, traditional, or religious practices specific to the local area.

4.3 Safety, health, and environment

TCP Group is committed to enhancing and promoting the quality of life for customers, employees, contractors, and surrounding communities by prioritizing safety, health, and environmental sustainability. The group continuously fosters a strong awareness among employees to adhere to these core principles, ensuring compliance with the practices established by TCP Group.

Employees are strictly prohibited from engaging in any activities that pose environmental risks, compromise safety, or negatively impact health.

4.4 Supply chain management

TCP Group actively monitors the sourcing of raw materials, production processes, and transportation methods to ensure compliance with human rights principles throughout the entire supply chain. The group is committed to procuring materials or components only from organizations or individuals who are not involved in illegal activities, human rights abuses, or terrorism.

4.5 Land and natural resource rights

TCP Group respects the rights and freedoms associated with land and water resource use throughout the value chain, ensuring full compliance with both domestic and international laws and regulations. The group acknowledges the land rights of farmers and local communities, managing land responsibly to minimize any adverse effects on these communities. It also respects the rights of communities and local people to maintain their way of life, customs, culture, and the ability to access land and traditional resources.

TCP respects the land rights of individuals or local communities by avoiding any unjust occupation or using land for business activities. Before establishing new business ventures, the group checks to verify the legitimacy of land rights and ownership.

4.6 Personal privacy

TCP Group recognizes the importance of personal data protection and is committed to respecting the privacy rights of employees, contractors, partners, and business associates. In compliance with relevant data protection laws, TCP Group has implemented a robust personal data protection policy, along with measures to ensure the security of personal data. Any breach of privacy rights is regarded as a serious disciplinary offense.

4.7 Political participation

TCP Group upholds a politically neutral stance, refraining from actions that demonstrate support for, or affiliation with, any political party or individuals in position of political power. However, the group fully recognizes and respects employees' rights and freedoms to engage in political activities such as voting or participating in political parties.

The Group will not use company funds or resources to support any political candidates, except in cases where such support is legally permitted and aligned with promoting democracy values.

TCP Group strictly prohibits the use of company resources for political campaigning, fundraising, or any activities linked to specific politicians or political parties.

Supervisors and employees at all levels are prohibited from directing or pressuring others to participate in any political activities in any capacity.

Employees are free to engage in political activities during their personal time, outside of working hours, using their own funds and personal resources. TCP Group considers such actions to be the personal decisions of the employees themselves.

5. Monitoring and enforcement

5. Monitoring and enforcement

TCP Group clearly defines the roles and responsibilities of executives, board members, directors, managers, and all employees. It is imperative that everyone is fully aware of, understands, and strictly adheres to the policies and practices set forth in this business ethics code. Compliance is not optional, and ignorance of these established practices will not be acceptable.

Leaders in each department are responsible for ensuring that employees under their supervision are well-informed, understand, and faithfully follow this code of conduct.

Employees who violate this code, leaders who fail to address violations, or those who allow or approve of unethical behavior will face disciplinary actions as outlined in the company's rules and regulations. These may include termination, compensation for damages, or legal action, depending on the severity of the violation.



In situations where there is uncertainty or difficulty in making decisions based on ethical standards, employees are encouraged to use their discretion by asking themselves the following questions:

QUESTION ?

- Does the action violate the law?
- Does the action violate the policies, regulations, and organizational culture of TCP Group?
- Does the action contradict universally accepted moral principles?
- Can the action be disclosed and accepted by society?
- Does the action tarnish the reputation and image of TCP Group?
- Does the action cause severe harm to stakeholders of TCP Group?



If the answer to any of these questions is 'yes', employees should refrain from proceeding and consult their direct supervisors for initial guidance. If further clarification is required, employees may then seek advice from Human Resources and Administration Department, followed by the Internal Audit Department in sequence.

6.Reporting and handling of code of conduct and management of business ethics violations

6.1 Reporting of code of conduct violations

TCP Group has established an independent Internal Audit Department that directly reports to the board of directors. This department serves as the designated point of contact for incidents, complaints, or suggestions from stakeholders affected by the company’s business operations. Reports can be submitted through a variety of channels, including:

E-mail internalaudit@tcp.com 	Internal Website of TCP Group https://Integrity.tcp.com 	External Website of TCP Group www.tcp.com 	Postal Mail Addressed to "Internal Audit Department" Company: T.C. Pharmaceutical Industries Co., Ltd. Address: 288 Ekachai Road, Klong Bang Phran, Bang Bon, Bangkok 10150 
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6.2 Management of whistleblowing/complaints regarding business ethics

Every complaint, when supported with clear evidence, will be handled consistently, transparently, and with utmost care, ensuring fairness to all parties involved. Management will follow the appropriate procedures as outlined in the Anti-Corruption Policy. Furthermore, all complaints, along with the identities of complainants and related witnesses, will be treated with strict confidentiality.



7.Q&A

Q : Question: As the developer of the employee database system for TCP Group, if you resign and get a new job, then take the program you developed to your new workplace, is it considered a violation of business ethics?

A : It is a violation of business ethics. According to section 1.2.5, if an employee creates any intellectual property during employment, it is considered as TCP's property. Disclosing information about such intellectual property without permission is strictly prohibited. Violators may face legal action if their actions result in harm to TCP Group.

Q : If a TCP business partner buys you a gold necklace as a New Year's gift, and you, being an employee of the department that purchases products and/or services from this business partner, accepts it, is it considered a violation of business ethics?

A : It is a violation of business ethics. According to section 3.3.1, employees should avoid giving or receiving any form of remuneration or gifts, whether in cash or otherwise, from business partners or individuals contacted by TCP Group unless during festivals and of reasonable value. The gift should not be related to current or potential business obligations. In cases where the gift has a high value (1,000 baht or more) and cannot be declined, employees should inform their supervisors and deliver the gift to the Human Resources and Administration Department for proper management, following the procedures outlined in section 3.3.3.

Q : If you work in the Human Resources and Administration Department and involved with employee salaries; disclose an employee's salary or history to other individuals, is this considered a violation of business ethics?

A : It is a violation of business ethics. According to section 4.6, such information is considered business-sensitive information of TCP Group and being personal information, is protected from unauthorized disclosure. It is prohibited to disclose personal information to individuals who are not relevant to the matter.

Q : If you are an IT employee, you have been invited by a business partner to study and observe technology demonstrations in a foreign country for 5 days without any expenses. Given that participating in this event would significantly enhance your knowledge and contribute to your IT responsibilities, would agreeing to attend be considered a violation of business ethics?

A : It is a violation of business ethics. Attending an overseas event without incurring any expenses is considered participation in an unusually lavish entertainment, as per section 3.3.2. However, if the employee believes that participating in such an event would be beneficial to their duties and direct work, they can request approval from their highest-level supervisor and the Human Resources Department with official invitation evidence from the business partner. It should be noted that TCP Group would be responsible for covering the expenses related to the study tour if it is deemed beneficial.

Q : In the scenario mentioned in item 4, if an employee participates in a study tour abroad without informing their supervisor and does not attend during working days (using their own leave entitlement to participate in the event), is this considered a violation of business ethics?

A : It is a violation of business ethics. Attending an overseas event without incurring any expenses is considered participation in an unusually lavish entertainment, as per section 3.3.2. Additionally, the fact that the employee received an invitation from a business partner to attend the study tour abroad is a benefit derived from their position or job duties within TCP Group, regardless of whether the employee attends the event on their days off or working days.

Q : If a business partner invites you, as an employee of TCP Group, to have a meal at a restaurant hotel to discuss and summarize event details and foster good relations, with the business partner covering the expenses, would accepting, and attending such an invitation be considered a violation of business ethics?

A : It is a violation of business ethics. According to section 3.3.2, employees should avoid participating in entertainment events that are unusually lavish. Employees should inform the business partner about the business ethics of TCP Group regarding such matters. In cases of genuine necessity, employees should notify their direct supervisors in writing, and TCP Group should be responsible for the associated expenses.

Q : If an employee asks a business partner, who is a representative of TCP Group, to arrange airplane tickets or products for personal benefit unrelated to TCP Group, would this be considered a violation of business ethics?

A : It depends on the circumstances:

- If the business partner is already a representative who regularly uses TCP Group services, this can be done without being considered a violation of business ethics. However, it must not involve coercion or improper influence, and it should not use the employee's position or job responsibilities to negotiate any terms that benefit the employee personally. Payment methods should be separated and not linked to TCP Group.

- If the business partner is not yet a representative and is in the process of selection, employees should avoid such actions to prevent potential bias that may impact the selection process for tasks assigned by TCP Group.

Q : In the case where you, as an employee of TCP Group, propose that the company, your family business/members, be considered for a partnership, believing it offers the best quality and negotiation terms due to the close relationship. As the person in charge of the procurement, having the authority to evaluate and select business partners, would this be considered a violation of business ethics?

A : Yes, it is a violation of business ethics.

As stated in section 3.1, when a business partner has a familial relationship with an employee, it may create a direct or indirect conflict of interest that contradicts or may be perceived to contradict the interests of TCP Group. In such cases, employees should inform supervisors and should not participate in decisions related to those conflicting interests.

Q : In the case where TCP Group receives a letter from a government agency disapproving of certain activities, individuals or business partners propose to carry out those activities, enabling TCP Group to proceed as usual. TCP Group would have to provide benefits to these individuals as compensation, considered part of the cost of goods and/or services. Is this action a violation of business ethics?

A : Yes, it is a violation of business ethics.

According to the Anti-corruption policy, TCP Group is committed to not providing benefits to officials from both public and private sectors to induce or influence them to act or omit to act in a manner that is inconsistent with their duties or to obtain inappropriate business advantages. In the event of such an incident, which may pose a risk of corruption, employees are required to report it to their superiors for appropriate management and consideration.

Q : If an official from a government agency in the area requested assistance in obtaining computer equipment for office use, how would you proceed?

A : Notify the official to have the government agency prepare a letter specifying the purpose and details of the request for assistance. This letter should be sent to the Corporate and Communications Department for review and further action following the established procedures of TCP Group.

Q : In the case where you, as a representative of TCP Group, travel to inspect a supplier's manufacturing facility abroad to ensure that their products meet TCP's standards, and the supplier agrees to cover the expenses (flight tickets, accommodation, and other expenses) for the entire duration of your visit, is this considered a violation of business ethics?

A : Yes, it is a violation of business ethics. According to section 3.3.2, employees should avoid accepting excessive hospitality from individuals or entities in contact with TCP Group. In this case, where the employee is traveling to inspect the supplier's facility for the benefit of TCP Group, the employee should seek approval from their supervisor in writing. Moreover, TCP Group should be responsible for covering the necessary expenses related to this inspection.

Q : In a scenario where an employee, after completing their duties outside the company and during their return to the office, makes personal stops such as shopping or having dinner when it is not yet time to finish work, and upon returning to the office, the employee confirms the overtime hours and requests approval from the supervisor to claim overtime pay, is this considered a violation of business ethics?

A : Yes, it is a violation of business ethics. According to section 1.1, employees are required to perform their duties with responsibility, honesty, and integrity. Employees must comply with the rules and policies of the company. Overtime work is allowed as per company regulations, especially in case of urgent or emergency tasks. In this scenario, requesting overtime pay under these circumstances is not conducted with integrity and does not align with the company's working regulations.

Q : Is it considered a violation of business ethics if an employee confirms their clock-in time in the morning (via fingerprint/card scan) at the company's working hours, then attend to personal matters (such as having breakfast in the nearby area) and returns to start working after finishing their personal errands. Alternatively, is it a violation if an employee arrives late, does not confirm their clock-in time, and requests approval to confirm their clock-in time according to the normal working hours (as if they did not arrive late) from a supervisor?

A : Yes, it is a violation of business ethics. As per section 1.1, employees are required to perform their duties with responsibility, honesty, and integrity. Employees must comply with the rules and policies of the company. In this scenario, the actions are considered dishonest and do not align with the standards of good conduct for employees as outlined in the company's working regulations.

Q : In the case where you travel abroad to perform duties for TCP Group, and your business partner hosts you at a hotel or restaurant, considering that such hospitality is a customary practice in the partner's country, and refusing might create a negative impression, would accepting such hospitality be considered a violation of business ethics?

A : According to section 3.3.2, if an employee cannot decline hospitality, and such hospitality is a customary practice in that country, without creating any business obligations, the employee may accept it without violating the business ethics of TCP Group. However, the employee must promptly inform their direct supervisor in writing as soon as it is practical after accepting the hospitality.

Q : Your department have set an expense budget for purchase of the services this year, the current business situation is not good as expected, so you postponed that spending for several months until December. Then, you asked your team to create purchase requisitions in the SAP system and coordinate with the procurement team to issue the purchase order, then worked with the vendor to issue the invoices first and agreed with them to start working early next year, to use up the approved budget in this year. Is this practice in compliance with the TCP Group code of conduct?

A : No, the practice is non-compliance with our TCP Group code of conduct. According to section 1.2, employee is responsible to use the company resources following to the actual business activities, confirming service receipt in the SAP system without actual service rendered, but giving personal commitment with the vendor to render the service later is prohibited.



Q : You are responsible for recording the business transactions into the SAP system. Normally, the manager signs on the vendor's invoice to approve the business transactions (goods and/or service received from the vendor) and sends the vendor invoices to you for recording the transactions in the SAP system. There is an invoice that you knew the services has not yet been completely delivered following to the agreed work scope, however, you did not oppose or discuss with the manager and record that business transaction as usual, Is this practice compliance with the TCP Group code of conduct?

A : No, the practice is non-compliance with our TCP Group code of conduct according to section 1.3, employee who records business transactions into the SAP system, is accountable for correctness and integrity of the business transactions, according to TCP Group policy and the relevant accounting standards and laws/ regulations. When the employee is aware of incorrect and/or invalid business transactions, the employee is required to inform the manager or higher supervisor.



Q : Besides working as the TCP Group employee, you have your own business after working hours, open an online shop selling healthy products. As a TCP Group employee, you normally work with several vendors on various projects, checking the correctness of services and deliverables provided by vendors. There is a vendor, interested in the healthy product which you have in your own business. In case you sold your product to that TCP vendor, is this practice compliance with TCP Group code of conduct?

A : No, the practice is non-compliance with our TCP Group code of conduct section 2.3, TCP employee can do their own business which is not competing with TCP business after working hour, however, that activities must not impact the normal work of the employee for TCP. According to section 3.1, employee should avoid business transactions which may be conflicted with TCP business or impact the employee decision to work for TCP benefit.

In case TCP employees and/or their family members have conflict of interest with TCP business, employee is required to inform their supervisor and the employee must not involve or influence in any decision making related to that business activity.



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