TURNKEY COMMUNICATION SERVICES PUBLIC COMPANY LIMITED

Code of Conduct

P-BOD-002

	Document Revision Record	Code P-BOD-002
TKC	Code of Conduct	Page 1/1 Revision 1

Revision	No.	Date	Page	Description/Details
1	1/2022	23/12/2022	All	Replace the Company new logo

Turnkey Communications Services Public Company Limited ('Company') institutes the Code of Conduct for staff and executives to uphold along with the rules of the Company with the hope that management and operations will be transparent, fair, efficient, honorable, and trustworthy to customers and the public with the following contents.

1. Business Ethics

The Company will ensure that employees related to business operations to follow the business ethical codes as follows:

(1) Perform business honestly and with social responsibility complying with laws, ethics, and good intentions towards individuals, community, society, and environment.

(2) Treat customers fairly with regards to goods and services with no discrimination.

(3) Undertake business with good standards and controls, while fully using knowledge and skills cautiously, adequate information, and have supporting evidence for legal and regulatory purposes in a strict fashion.

(4) Not disclose customer data beyond what is required in business operations with an emphasis on confidentiality except in cases where it is required to disclose by law.

(5) Allow customers to voice complaints regarding unsatisfactory goods and services.

(6) Fully disclose news and information related to goods and services.

(7) Follow agreements and conditions in dealing with customers and treating them fairly. If the agreements and conditions cannot be met, the Company must quickly inform the customer to seek a joint solution.

2. Code of Conduct for Executives

All executives must follow rules, regulations, announcements, and orders of the Company and superiors, including:

(1) Support the policy and follow rules, regulations, announcements, orders, and circulars of the Company, which informs all staff, strictly.

(2) Follow duties honestly and fairly and report events that may impact on the Company's reputation or damage its assets.

(3) Behave politely and treat colleagues with respect.

(4) Perform duties with great determination, diligence, and compliance with work plans and governance of the Company in order to be a role model to all staff so that the Company can progress in an appropriate fashion.

(5) Maintain the benefit and confidentiality of the Company, customers, or any activity for which the Company wishes to remain secret. Disclosure of any financial or personnel information linked to the Company must be approved with caution and efficiency. In addition, employees must maintain the confidentiality of information both during their tenure with the Company and after their departure as well. If there is a breach of confidentiality, the employee will agree to compensate the Company for all losses.

(6) Be cautious and protect the Company's assets by preventing its loss to person, disasters as they best can. In addition, employees must not use the Company's assets for personal use that is unrelated to the Company's business.

(7) Manage the business with justice and ethics at all corporate levels, monitor and resolve problems and conflicts of interest that may arise within the Company.

(8) Lead subordinates closely and fairly without prejudice.

(9) Be a team player and listen to other people.

Executives must follow, encourage, and direct subordinates to follow the rules, discipline, and restrictions of the Company strictly using computer systems, computer data, and computer traffic information from the Company in order that the Company's computers follow copyrights rules and other related laws and protects against damage to the Company's reputation and image.

3. Things that Executives Shall Avoid

All executives will avoid behavior that is detrimental to the Company's reputation as well as their own, as follows:

(1) Use company time for other purposes or for personal benefit.

(2) Operate a similar business in competition to the Company, whether for personal benefit or those of others. They must not control such businesses through nominees, which could be detrimental to the Company either directly or indirectly.

(3) Behave in a manner that is detrimental to his office or the Company's honor.

(4) Distribute misleading information to or hide facts from the Company.

(5) Work in a negligent manner or do anything that is unbecoming a good executive, so that the work may flow smoothly and honestly.

(6) Hide or distort facts for personal gain or benefit of another person such that the Company may be negatively impacted, either directly or indirectly.

(7) Block or create obstacles to responsible personnel or issue orders that force staff to act inappropriately or unethically.

(8) Violate civil or criminal laws and cause damage to themselves or others, whether intentionally or not.

(9) Reveal compensation or salary, rate of salary increases of the executive to others, whether intentionally or unintentionally.

(10) Demand or accept assets or benefits from customers, suppliers, competitors, or any person doing business with the company or accepting entertainment well in excess of what is suitable, unless it is a traditional gift, normal reception, or a reputable marketing budget in order to exchange traditions (networking). It should be in line with the policy on accepting gifts and entertainment.

(11) Offer bribes, whether directly or indirectly via a third person, or use undue influence on representatives of the state, customer, or supplier, which contradicts the Company policy.

(12) Adding or redacting facts or memos in order to change or distort operating results and cause intentional misrepresentation for whatever reason.

(13) Pay or arrange payment intentionally or cause misunderstanding related to payments with reasons other than the ones officially recorded in the payment.

(14) Be a highly indebted person or have certain legal reasons that may cause others to view him as a heavily indebted person.

(15) Not protect the Company's IP (intellectual property) or those IP which the Company receives from the executive's work.

(16) Copy work or IP from others.

(17) Seek undue benefit for own self or others.

(18) Direct a department other than procurement to perform procurement functions. (If it is necessary to gain the cooperation of other departments, he should get procurement to perform such functions. If it involves sales promotion, he should delegate the responsibility to Marketing or Business Development.)

(19) Operate with gross negligence or enable others to seek benefit or access/hack computer systems, computer data, the Company's online traffic information, either improperly or without permission from the Company. Intentionally allow wrong to be done to service providers according to computer laws, copyrights laws, or other laws.

4. Penalties for executives

(1) Serious violation: The executive will receive a written warning, which details the violation, both reason and factual, and allow the executive to justify himself before his superiors. If the problem cannot be resolved, the matter will be submitted to the Board of Directors for consideration, and the board's decision will be considered final. If there is a second violation or if the executive does not resolve the problem created by the first violation, then the executive will be subject to disciplinary action, which may include termination.

(2) Serious violations include the following violations, such as accepting bribes, corruption, breach of confidentiality, violation of third-party IP, or any act that is detrimental to the Company's reputation, Hiding or not reporting facts, discussions, or important documents to superiors. The Company may consider termination without compensation without the need to issue a written prior notice.

5. Code of Conduct for Employees

To promote efficient performance, the employees shall conduct themselves in the following manner:

(1) The employee shall work honestly and diligently, improving the efficiency of work so as to benefit the Company.

(2) The employee shall strictly follow the Company's rules and regulations.

(3) The employee will respect and obey their superiors within the confines of the policy, rules and regulations of the Company.

(4) The employee will foster teamwork and cooperation and not create conflicts which may lead to damage to others and the Company.

(5) The employee will respect the rights and show mutual respect to each other, avoid using the work-related information of others, disclosing or gossiping about other's personal information in a manner that causes damage to the employee or Company.

(6) The Company should refrain from accepting gifts that potentially compromise their position in future work. If it cannot be avoided, inform their superiors immediately.

(7) The employee will not use his position or advantages from work to seek personal benefit or benefits for friends or compete with the Company.

(8) The employee must treat customers and suppliers honestly and equitably.

(9) The employee will strictly maintain confidentiality for customers, suppliers, and the Company.

(10) The employee will report issues that impact work or may damage the Company's reputation to their superiors without delay.

(11) The employee will protect the benefit and assets of the Company in good condition, maximize its potential benefit. They should use such assets sparingly and not waste resources or cause it to wear down before its time.

6. Penalties for employees

If an employee conducts himself in a manner that conflicts with the Company's benefit, he will be considered according to the Company's structure and work-related rules. In this matter, the department will make their own assessment and submit the conclusion to superiors within the chain of command in order to determine the suitable penalty. However, if the conflict of interest becomes very serious and causes serious damage, the matter may be outside the purview of his line manager. As such, the matter will be submitted to the Company's Management Team for further consideration and penalty determination.

Types of penalties

(1) Verbal warning
(2) Written warning
(3) Pay cut
(4) Temporary leave
(5) Termination without compensation within the confines of labor protection law
(6) Litigation

This Code of Conduct was reviewed and approved by the Board of Directors at Meeting No. 5/2025 on November 12, 2025, and has been effective from November 12, 2025.

- Kittisak Amornchairojkul -
(MR. KITTISAK AMORNCHAIROJKUL)
Chairman of Board of Directors