



## Code of Conduct

## Table of Content

Topics	Page
<b>1. Code of Conduct</b> <ul style="list-style-type: none"> <li>- Individual Integrity</li> <li>- Compliance with Legal Regulations</li> <li>- Code of Conduct</li> <li>- Anti-Money Laundering</li> <li>- Anti-Bribery and Corruption</li> <li>- Charitable Donation</li> <li>- Social Responsibility</li> <li>- Environmental Care</li> <li>- Respect for Human Rights</li> <li>- Respect for Intellectual Property</li> </ul>	5 - 6
<b>2. Board of Directors and Executives Roles</b> <ul style="list-style-type: none"> <li>- Management Role</li> <li>- Governance Role</li> <li>- Transaction with the Bank</li> </ul>	7
<b>3. Service Standard</b> <ul style="list-style-type: none"> <li>- Standard Terms of Services</li> <li>- Requirements of Service Standard</li> <li>- Debt Collection Standard</li> </ul>	8
<b>4. Staffs and Working Environment</b> <ul style="list-style-type: none"> <li>- Workplace Diversity</li> <li>- Equality in the Workplace</li> <li>- Pride at Work</li> <li>- Safe Working Environment</li> <li>- Fair Treatment</li> </ul>	9
<b>5. Responsibility to Customers</b> <ul style="list-style-type: none"> <li>- Treatment for Customer's Utmost Benefit</li> <li>- Response to Customer Complaints</li> <li>- Advertisement and Marketing Campaigns</li> </ul>	10

Topics	Page
<b>6. Conflicts of Interest</b> <ul style="list-style-type: none"> <li>- Prevention on Exploiting Inside Information</li> <li>- Personal Investment</li> <li>- Conflict Avoidance</li> <li>- Receiving and Giving Other Interest</li> </ul>	11
<b>7. Practices for Information</b> <ul style="list-style-type: none"> <li>- Confidential Data Management</li> <li>- Communication Responsibility</li> </ul>	12
<b>8. Overall Compliance</b> <ul style="list-style-type: none"> <li>- Compliance Culture</li> <li>- Whistleblowing Policy</li> </ul>	13
<b>9. Trade Competition and Dispute Resolution</b> <ul style="list-style-type: none"> <li>- Monopoly</li> <li>- Internal Dispute Resolution</li> <li>- External Dispute Resolution</li> </ul>	14

### Enforcement

It is the duty of all supervisors at all levels to ensure the compliance of the Code of Conduct as part of employee discipline

## 1. Code of Conduct

### Individual Integrity

The Bank aims for conduct business with honesty and without exploitation. The principle of anti-corruption is laid down in compliance with law and regulations of the Bank. All activities and decisions of the Bank are made under code of conduct.

### Compliance with Legal Regulations

Since the Bank operates its business in the industry with strict regulation, therefore; the high awareness of and compliance with law and regulations is important for business and foundation of the Bank. All employees must always keep in mind that they must comply with not only written code of conduct but also must intend to adhere to the law. Violation of law or participation in unfair, fraudulent and dangerous acts will result in weakening customers' confidence and putting the Bank's reputation at risk as well as effecting to the assessment of regulator, prosecution, fines and penalty, including other negative feedback on the Bank.

### Code of Conduct

Apart from compliance with law and regulations, the Bank anticipates that all employees will strongly adhere to the highest standard of code of conduct. The Bank commits itself to serve customers and all stakeholders with fairness, integrity and without discrimination. Furthermore, the Bank will offer competitive advantages by providing premium products and services and never participated in business competition in illegal and unethical conduct.

### Anti-Money Laundering

Money laundering is the crime that seem as if the money has been obtained legally. It results from crimes such as corruption, drug trafficking and terrorism. Anti-money laundering policy and related process of the Bank are designed to comply with law and regulations related to laundering, financial terrorism and economic sanctions. All employees have responsibility to follow such the policy, process and control.

### Anti-Bribery and Corruption

Accepting and taking bribes is prohibited. All employees of the Bank must not directly or indirectly offer or promise to give valuable things to state officers, customers or business partners which is the chance to gain advantage. All employees must not request or accept valuable things from anyone

if such giving is provided with inappropriately intention to affect the employees' decisions on behalf of Krungthai Bank.

Offers of gifts/hospitality must be made in 'good faith' and are not considered legitimate if the intention behind the offer is to advantage the individual making the offer.

### **Charitable Donation**

The Bank intends to conduct good business and perform role in supporting society. The Bank's donation will be various charitable support and contribute to other organizations appropriately.

### **Social Responsibility**

The Bank commits to seriously and continuously giving back to society and exhibits social responsibility in various forms through products and services, including extra activities with the intention to encourage sustainable development.

### **Environmental Care**

The Bank attaches importance to environmental management by using resources effectively and efficiently as well as helps reducing environmental impact from operations. The Bank also encourages all employees to pays attention to environmental care.

### **Respect for Human Rights**

The Bank conducts its business by adhering to national and international laws as well as Universal Declaration of Human Rights or UDHR. The Bank promotes the basic human rights principles in every business units and business areas of the Bank. The Bank respects for protecting and not involving human rights violations according to principles specified in Universal Declaration of Human Rights of the United Nations.

### **Respect for Intellectual Property**

The Bank will not violate intellectual properties – trademark, patent, trade secret and other copyright works. By using, publicizing or modifying any intellectual property, the permission from the owner of such intellectual property must be granted.

Meanwhile, all employees must protect the Bank's intellectual properties, e.g. patent, trademark, trade secret, copyright and other information of the Bank.

## 2. Board of Directors and Executives Roles

### Management Role

Directors and executives have responsibility manage and support the Bank to get good operating performance and profits continually and sustainably by means of conducting business with prudence and transparency as well as its competitive competency to build value added to shareholders in long term.

### Governance Role

Directors and executives must perform their duty with responsibility, carefulness and honesty as well as complying with law, objectives, regulations of the organization, board resolutions and resolution of shareholders' meeting (Fiduciary Duty), together with providing internal control system, effective risk management and promoting good governance in every level.

### Transaction with the Bank

and in the normal commercial manner as similar to transactions with ordinary person with no special relationship. Directors and executives must essentially perform operation for advantages of the Bank and avoid conflict of interest.

### 3. Service Standard

#### Standard Terms of Services

When any customer or person requests, the Bank shall provide the following information:

- a) Terms and conditions for existing transactions services of that Bank
- b) Other standard fees and expenses that are or may be charged for existing transactions and;
- c) Interest rate for existing transactions of the Bank

#### Requirements of Service Standard

When any customer requires details of transactions provided by the Bank, the Bank will provide accurate information as follows:

- a) Procedure of opening account
- b) The Bank's duty of customer confidentiality of
- c) The Bank's method of dealing with complaints
- d) Suggestion for contacting the Bank in case of any service obstruction arising in order that the Bank can solve problem promptly
- e) Suggestion for reading of terms and conditions related to the transaction services

#### Debt Collection Standard

The Bank and its representatives will comply with laws when they attempt to collect obligation which has become past due. The Bank will ensure that every individual who is assigned to collect the debt will follow the same procedures. If the Bank acknowledges that a representative of the Bank or an individual assigned by the Bank to collect the debt does not comply with the law, the Bank will take actions to ensure that their compliance.



## 4. Staffs and Working Environment

### Workplace Diversity

The Bank values performance of all employees. Workplace diversity means diversity in ideas and experiences, which are great stimulus. Furthermore, it reflects diversity in the Bank's customer base and allows the Bank to identify and respond to different needs and opportunities. The Bank will not allow discrimination based on race, color, nationality, citizen status, belief, religion, religious practice, age, gender, sexuality, pregnancy, maternity, caregiving responsibility, marital status, same-sex civil partnership, sexual orientation, sexual identity, gender expression, genetic information, disability, veteran status or any other status protected by law.

### Equality in the Workplace

The Bank promotes equality in the workplace so that all employees have equal chance at work. The Bank will not allow any actions which cause discrimination, especially discrimination based on race, nationality, gender, sexuality, religion, age, marital status, pregnancy, disability or any other status protected by law.

### Pride at Work

The Bank is determined to promote pride as a Bank's employee and is opposed to any interactions undermining employee pride, e.g. harassment or defamation, which are against the Bank's code of ethics.

### Safe Working Environment

The Bank ensures that working environment is free of violence, bully, harassment or any harmful actions. In case of violent act, whether to individual or the Bank's asset, the incident must be immediately reported to relevant agencies. Employees are not allowed to sell or distribute alcohol or drug in the Bank or while working.

### Fair Treatment

The Bank promotes and encourages its employees to get self-development opportunities. Fair remuneration is provided to employees based on fair performance appraisal. Personal data of all employees are kept confidential and will not be exploited for benefit.

## 5. Responsibility to Customers

### Treatment for Customer's Utmost Benefit

The Bank handles its customers while prioritizing the customers' benefit, so that the customers received fair, responsible and consistent services from the Bank. The Bank will listen to the customers' opinion and ensure that the customers are served professionally and treated with respect while their satisfaction is considered as first priority.

### Response to Customer Complaints

The Bank handles to customer complaints promptly and professionally by investigating surrounding circumstances, trying to understand the problem and taking action promptly. The Bank will investigate using appropriate, transparent and fair methods and will learn from errors to improve the services.

### Advertisement and Marketing Campaigns

The Bank advertises and runs marketing campaigns, as well as offering the best products and services that meet customers' needs and suit their capacity. The Bank also disclose information about the Bank's products and services so that customers have good understanding about the products and services and have adequate information to make decisions. Furthermore, the Bank's advertising materials must be transparent and must contain no misleading content.

## 6. Conflicts of Interest

### Prevention on Exploiting Inside Information

As an employee of a financial service provider, you may have access to Material Non-Public Information (MNPI) regarding the Bank, customers and other companies in business relationship with the Bank.

MNPI is information not generally disclosed to the public. In case such information is disclosed to public, there is high possibility to impact the market price of assets issued by the certain company (whether the Bank or other companies) or will influence investors' decision to buy or sell the asset.

Policy and rules regarding information barrier, e.g. Chinese Wall, are established to serve as a guideline for preventing non-public information exchange between employees working in private side and public side. Therefore, it is the duty of the involving employees to review and follow the policy and rules regarding information barrier governing their transactions.

### Personal Investment

Every employees of the Bank must ensure that their personal investment is conducted while bearing in mind the Bank's reputation. The personal investment must comply with all relevant laws, regulations, the Bank's policies. Moreover, while in the role of the Bank's employees, they must primarily consider the interest and benefit of the Bank's customers and the Bank, not their own interest and benefit.

### Conflict Avoidance

The Bank's employees must avoid being involved in any activities or relationships that may affect their neutrality in making decisions as a Bank's employee. The employees must not allow their personal interest to have conflict or appear to have conflict with the Bank's interest.

### Receiving and Giving Other Interest

The Bank's employees must be careful in accepting, receiving, or instructing others to accept or give the interest on their, their spouses' or their relatives' behalf when the interest/benefit may influence their business decisions in the Bank's matter or when the giver expects career advancement or favorable performance appraisal. Other benefit includes gifts, souvenirs, money, any assets or benefits with monetary value, e.g. reduction of loan principal, reduction of loan principal gratis, interest-free loan, provision of services free of charge or interest or with less charge in comparison with the normal commercial charge for others, and any other acts in the interest of such persons which could be

calculated in monetary term or those with zero expenses to be incurred, as reflected in the rules and regulations stipulated by the Office of the National Anti-Corruption Commission.

## 7. Practices for Information

### Confidential Data Management

The Bank's employees must keep the Bank's confidentiality. Confidential data may be in the format of written documents, telephone conversation or various electronic formats from applications, business strategies, as well as list of customers in credit process, customer privileges and personal data. In identifying confidential data in accordance with code of conduct's best practice is to consider all personal data and information regarding the Bank and its business (concerning customers, partners, suppliers, directors and employees in the past, present and future) confidential unless otherwise specified.

### Communication Responsibility

The Bank respects the employee's rights to participated in the discussion on topic related to society, profession and politics outside the workplace. However, all information regarding the Bank and its business must be communicated by a person who is authorized to speak on behalf of the Bank in order to ensure that the communication is accurate and truly reflects the Bank's opinion. Besides, the Bank is aware of its duty to be in complying with regulations regarding communications and to protect the confidentiality of the Bank's business and the customers' data.

## 8. Overall Compliance

### Compliance Culture

The best practice to ensure compliance with rules is to build compliance culture in the organization. In order to accomplish the goal, the top executives must be the role model by working with integrity, transparency and fairness. Moreover, all employees must perform their duty while prioritizing accuracy over speed of service, profit or personal image.

### Whistleblowing Policy

When encountering violation of rules/regulations, employees can make a report or complaint to Office of the President or the division specified in Whistleblowing Policy. The Bank promises that all complaints will be considered fairly, transparently and carefully throughout the whole process. The identity of the whistleblower will be kept confidential and the whistleblower will be protected throughout the investigation process and after it ends.

## 9. Trade Competition and Dispute Resolution

### Monopoly

The Bank operates its business independently and competes in the business fairly. The Bank and its employees must not verbally attack competitors or provide ambiguous information to discredit competitors. Furthermore, they must not inappropriately interfere with the customers' decision to switch to other banks.

### Internal Dispute Resolution

The Bank arrange internal dispute resolution as an internal process without fee charge, whether it is the employee's dispute concerning his/her job or dispute between the Bank and its customer. The Bank prioritizes the satisfaction of both its employees and customers and informs them of the coordinator's name. If there's a delay in investigation, the Bank shall be able to explain the reasons of the delay.

### External Dispute Resolution

If a conflict which requires external dispute resolution process, e.g. adjudicative process or any other non-court dispute resolution process, the Bank will be cooperative in the external dispute resolution process. The process will be free of charge and meet the standard of external dispute resolution. However, it must conform with conditions relating to the Bank.