



-Translated Version-

## Code of Conduct

### Ubon Bio Ethanol Public Company Limited and Its Subsidiaries

The Code of Conduct serves as a guideline for good business practices for directors, executives, and employees to uphold and comply with through honesty, integrity, fairness, social responsibility, diligence, perseverance, and continuous development toward professionalism. The Company has established operational and business codes of conduct as guidelines for good business practices to be observed by directors, executives, and employees. Such codes emphasize key principles of corporate governance, equitable and fair treatment of stakeholders, transparency, accountability, and respect for the rights of all stakeholder groups in order to promote balance within society as a whole. The Company also places importance on the continuous development of its personnel in terms of knowledge, capabilities, morality, and ethics by fostering behavioral foundations that encourage continuous learning, ongoing improvement of products and services, knowledge sharing among one another, and cultivating awareness of honesty, integrity, diligence, perseverance, and responsibility in developing quality and professionalism.

#### Section 1 Code of Conduct for Directors, Executives, and Employees

##### 1. Personal Conduct

- 1.1 Directors, executives, and employees shall perform their duties in compliance with laws relevant to the Company's business operations, the Company's objectives, Articles of Association, principles of good corporate governance, the Code of Conduct, and resolutions of the shareholders' meetings.
- 1.2 Directors, executives, and employees shall pursue knowledge and experience in order to enhance their capabilities and improve the efficiency and effectiveness of their performance.
- 1.3 Directors, executives, and employees shall uphold morality and integrity and shall not seek, demand, or accept any improper benefits for themselves, their families, friends, or acquaintances.
- 1.4 Directors, executives, and employees shall refrain from vice, gambling, and all forms of addictive substances and shall not behave in any manner that may damage their own reputation or the reputation of the Company, such as maintaining excessive personal debts, engaging in any form of gambling, or becoming involved with illegal substances.



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- 1.5 Directors, executives, and employees shall not engage in any occupation, profession, or activity that may adversely affect the performance of their duties or the reputation of themselves or the Company.
- 1.6 Directors, executives, and employees shall avoid financial obligations with persons conducting business with the Company or among personnel themselves, including lending or borrowing money and participating in fundraising or informal financial schemes, such as rotating savings groups, except for charitable or public benefit activities.
- 1.7 Directors, executives, and employees shall not seek any improper benefits, whether directly or indirectly.
- 1.8 Directors, executives, and employees shall not undertake any action involving management or administration in any other company that may undermine the interests of the Company or provide benefits to any person or juristic entity, whether for their own benefit or for others.
- 1.9 Directors, executives, and employees shall maintain and promote unity and harmony within the organization.

## **2. Treatment of Colleagues**

- 2.1 Directors, executives, and employees shall promote teamwork by cooperating, supporting, and assisting one another for the overall benefit of the Company's operations.
- 2.2 Directors, executives, and employees shall treat colleagues with courtesy, kindness, and good human relations, adapt themselves to work effectively with others, and shall not conceal information necessary for the performance of colleagues' duties.
- 2.3 Directors, executives, and employees shall respect others and shall not claim another person's work or achievements as their own.
- 2.4 Supervisors shall conduct themselves in a manner worthy of respect and serve as good role models for subordinates, including treating subordinates and colleagues at all levels with courtesy and respect.
- 2.5 Subordinates shall treat their supervisors with respect.
- 2.6 Subordinates shall listen to the advice and instructions of their supervisors and shall not bypass their immediate supervisors in performing duties, unless instructed otherwise by higher-level supervisors, and shall maintain courtesy toward personnel and colleagues at all levels.
- 2.7 Directors, executives, and employees shall avoid disclosing or criticizing information or stories relating to other personnel, whether regarding work-related matters or personal matters, in a manner that may cause damage to such personnel or to the overall image of the Company.

2.8 Directors, executives, and employees shall not engage in any immoral acts or sexual harassment toward other personnel. Such conduct includes any behavior causing annoyance, discomfort, intimidation, hostility, or an offensive working environment, as well as unreasonable interference with the performance of duties of other personnel. Such behavior includes harassment, indecent acts, or sexual misconduct, whether verbal or physical in nature.

### 3. Treatment of the Company

3.1 Directors, executives, and employees shall perform their duties with responsibility, honesty, integrity, commitment, and dedication, devoting their physical and intellectual efforts to work, as well as complying with the Company's rules and regulations, principles of good corporate governance, Code of Conduct, policies, corporate values, and good traditions, while placing the interests of the Company as a priority.

3.2 Directors, executives, and employees shall perform their duties in compliance with occupational health, safety, and working environment policies.

3.3 Directors, executives, and employees shall strictly maintain the confidentiality of customers, business partners, and the Company by exercising due care to prevent confidential documents or information from being disclosed or leaked to unauthorized persons, which may cause damage to the Company.

3.4 Directors, executives, and employees shall not make defamatory statements or engage in any acts that may lead to division or damage within the Company or to persons associated with the Company.

3.5 Directors, executives, and employees shall maintain their personal reputation so as to be accepted and respected by society, government agencies, and other organizations, and shall not engage in any act that may damage the image or reputation of the Company.

3.6 Directors, executives, and employees shall foster good relationships and cooperate with society, communities, government agencies, and related organizations. Personnel of the Company shall perform their duties carefully and prudently for the benefit of the Company, the country, and the public as a whole.

3.7 Directors, executives, and employees shall pay attention to and support actions that preserve the working environment and atmosphere, including promoting organizational development toward excellence.

3.8 Directors, executives, and employees shall avoid giving and/or receiving gifts, entertainment, or any other benefits from business partners or persons connected with the Company's business, except where such actions are for legitimate business purposes of the Company or

are customary during festivals or traditional occasions and are of appropriate value, whereby the recipient should exercise proper judgment in considering such gifts or benefits received.

3.9 Directors, executives, and employees shall not participate in or conceal any acts that may give rise to conflicts of interest with the Company, corruption, or any unlawful acts.

3.10 Directors, executives, and employees shall not ignore or remain indifferent upon becoming aware of or suspecting any acts that may constitute corruption. Such matters shall be reported to supervisors or responsible persons, or through the designated reporting channels, and personnel shall cooperate in any fact-finding investigation in accordance with the Company's regulations.

## **Section 2 Business Code of Conduct**

### **1. Code of Conduct Regarding the Treatment of Stakeholders**

The Company places importance on the equitable treatment of all stakeholder groups. All stakeholders shall therefore be treated by the Company in accordance with their rights under applicable laws or agreements entered into with the Company. The Company and its personnel shall treat stakeholders with honesty, integrity, equality, fairness, and quality, in compliance with contracts, agreements, and relevant conditions.

#### **Guidelines**

##### **1.1 Treatment of Customers**

1.1.1 The Company shall produce quality products and comply with contracts, agreements, and conditions with customers in a transparent and equitable manner. In the event that the Company is unable to comply with such obligations, the Company shall promptly negotiate with customers in advance in order to jointly determine appropriate solutions and prevent potential damages.

1.1.2 The Company is committed to creating customer satisfaction and confidence by providing excellent quality services under appropriate safety standards and technology, while continuously improving service standards.

1.1.3 The Company shall disclose information regarding products and services completely, accurately, and in a timely manner without distorting facts, and shall maintain good and sustainable relationships with customers.

1.1.4 The Company shall establish customer service systems and communication channels to enable customers to submit complaints regarding products and services, and shall use its best efforts to respond to customer needs promptly and appropriately.

- 1.1.5 The Company shall consistently place importance on maintaining the confidentiality of customer information and shall not use such information for personal benefit or for the benefit of related parties.

## **1.2 Treatment of Business Partners**

- 1.2.1 The Company shall strictly comply with contracts, agreements, and conditions with business partners in a transparent and equitable manner.
- 1.2.2 The Company and its personnel shall neither demand, accept, nor provide any dishonest or improper commercial benefits to or from business partners.
- 1.2.3 In the event that the Company is unable to comply with any conditions, the Company shall promptly notify the business partners in advance in order to jointly determine reasonable solutions to the issues.
- 1.2.4 The Company shall consistently place importance on maintaining the confidentiality of business partners' information and shall not use such information for personal benefit or for the benefit of related parties, unless consent has been obtained from the business partners.

## **1.3 Treatment of Competitors**

- 1.3.1 The Company shall treat competitors fairly and equitably and conduct business on the basis of mutual fair benefits.
- 1.3.2 The Company shall conduct its business under the framework of free and fair competition.
- 1.3.3 The Company shall not seek competitors' confidential information through dishonest or inappropriate means.
- 1.3.4 The Company shall not damage the reputation of competitors through false or unfounded accusations.
- 1.3.5 The Company shall not enter into any agreement with competitors or any persons in a manner that may reduce or restrict trade competition.
- 1.3.6 As competition laws are complex and may differ from country to country, consultation with the legal department should be undertaken at an early stage in order to prevent any violation of applicable laws in such jurisdictions.

#### 1.4 Treatment of Creditors

- 1.4.1 The Company shall strictly comply with contracts, agreements, and conditions with creditors in a transparent and equitable manner.
- 1.4.2 The Company shall regularly report the Company's financial status to creditors honestly, accurately, and in a timely manner.
- 1.4.3 In the event that the Company is unable to comply with any conditions, the Company shall promptly notify and negotiate with creditors in advance in order to jointly determine solutions and prevent possible damages.

#### 1.5 Treatment of Employees

- 1.5.1 Recruitment, selection, and employment shall be conducted on the basis of equality and equal opportunity for all applicants. Consideration shall be given to individuals with appropriate knowledge, capabilities, experience, morality, qualifications suitable for the position and job description, and attitudes consistent with the Company's corporate values.
- 1.5.2 Employees shall receive fair and appropriate remuneration based on their knowledge, capabilities, responsibilities, and performance.
- 1.5.3 Appointment, transfer, promotion, rewards, and disciplinary actions relating to employees shall be conducted fairly, impartially, and based on knowledge, capabilities, suitability, and the conduct or performance of such employees.
- 1.5.4 The Company shall treat employees fairly and place importance on employee development, knowledge transfer, and capability enhancement by providing employees with equal and consistent opportunities.
- 1.5.5 The Company shall comply with laws and regulations relating to employees and uphold internationally accepted principles of fundamental human rights without discrimination based on origin, race, gender, age, skin color, religion, disability, social status, family background, educational institution, or any other status unrelated directly to work performance.
- 1.5.6 The Company shall maintain a working environment that is consistently safe for the life, health, physical well-being, and property of employees.
- 1.5.7 The Company shall manage its operations by avoiding any unfair practices that may affect the stability of employees' work and employment.

- 1.5.8 The Company shall promote employees' understanding of the Code of Conduct and their roles and responsibilities in order to encourage ethical conduct throughout the Company.
- 1.5.9 The Company shall encourage employees to participate in determining work directions, as well as solving problems within their departments and the Company as a whole.
- 1.5.10 The Company shall encourage employees to attend additional training programs related to their duties and responsibilities.
- 1.5.11 The Company shall encourage employees to uphold morality and ethical values.
- 1.5.12 The Company shall equally and fairly listen to opinions and suggestions from employees at all levels.
- 1.5.13 The Company shall provide channels through which employees may report any acts indicating non-compliance with laws, governmental regulations, principles of good corporate governance, the Code of Conduct, Company policies and regulations, or suspected fraudulent acts. The Company shall also provide protection to complainants, whistleblowers, and related persons from retaliation or adverse consequences arising from such reports.

**1.6 Treatment of Communities, Society, and the Environment**

- 1.6.1 The Company shall not undertake any actions that may cause damage to natural resources or the environment beyond the limits prescribed by law.
- 1.6.2 The Company shall not support any activities that are harmful to society or public morality and/or promote vice or inappropriate behavior.
- 1.6.3 The Company places importance on community and social activities with an emphasis on social and community development, environmental preservation, and the creation and conservation of natural resources, particularly in communities surrounding the Company's operating locations.
- 1.6.4 The Company shall support activities that provide public benefits, such as medical and public health activities, educational support for people in communities, sports, and the promotion of local culture, taking into consideration the appropriateness and sustainable benefits to society and communities.
- 1.6.5 The Company shall continuously cultivate awareness of social and environmental responsibility among the Company and its personnel.

- 1.6.6 The Company shall cooperate with and ensure strict compliance with the spirit and intent of applicable laws and regulations.
- 1.6.7 The Company shall listen to opinions and suggestions and provide complaint-handling mechanisms for matters that may affect communities, investigate causes, implement corrective actions, and notify complainants of the results within an appropriate period. Such actions shall promote mutual benefits and sustainable coexistence between the Company and communities.
- 1.6.8 The Company shall respond promptly and effectively to incidents affecting communities and the environment arising from the Company's operations and shall fully cooperate with government authorities and related agencies.
- 1.6.9 The Company shall conduct business in accordance with standards relating to quality, security, occupational health and safety, environmental management, and energy management, including promoting efficient energy conservation for the benefit of future generations.

## 2. Code of Conduct Regarding Procurement

Procurement of goods and services is an important process that supports the continuity of the Company's business operations. Therefore, the Company requires that procurement procedures be conducted in accordance with established rules and procedures in a fair, reasonable, transparent, and verifiable manner, free from conflicts of interest, and with equitable treatment of business partners under fair competition principles in order to ensure maximum benefit to the Company.

### Guidelines

- 2.1 Procurement of goods and services shall take into consideration operational requirements, cost-effectiveness, and the quality of goods and services. Procurement processes must strictly comply with procurement rules, procedures, and approval authority, and shall be conducted transparently. Accurate and complete information shall be disclosed to business partners, with equal opportunities provided fairly and without bias or discrimination, while promoting fair competition among business partners.
- 2.2 Relationships with business partners shall be conducted on an equitable basis. Personnel shall not demand any benefits or assets, shall maintain neutrality, and shall avoid becoming excessively close to business partners in a manner that may improperly influence decision-making and compromise transparency, fairness, and equality. Personnel should also listen to complaints, comments, and suggestions from business partners in order to improve operational processes and resolve issues.

- 2.3 Personnel of the Company shall not participate in procurement processes involving business partners who are related to them, such as parents, siblings, spouses, children, or children's spouses, and shall comply with the Code of Conduct regarding conflicts of interest.
- 2.4 The Company shall not procure goods or services with specifications or qualifications intentionally designed to favor any particular products or services, unless supported by sufficient justification and necessary for the best interests of the Company.
- 2.5 Confidential information received from bidders or tender participants shall be strictly maintained and shall not be disclosed to other parties. Information or documents relating to procurement shall not be disclosed to competing business partners unless authorized by persons with proper authority and in compliance with the Code of Conduct regarding confidentiality and the use of inside information.
- 2.6 Executives with procurement authority shall supervise, monitor, and ensure that employees conduct procurement in accordance with established procedures and the Business Code of Conduct, and shall exercise discretion in providing consultation, guidance, and consideration of employees' opinions.
- 2.7 Inspection and acceptance of goods or services shall be conducted carefully and prudently to ensure that the goods or services received fully comply with specifications, contractual requirements, or procurement agreements, including quantity, quality, and delivery schedule.

### **3. Code of Conduct on Respect for International Human Rights Principles**

The Company adheres to internationally recognized human rights principles as a common standard of practice, taking into consideration human dignity, rights, freedom, and equality. The Company shall neither engage in nor support any actions that violate international human rights principles and shall strictly monitor its business operations to ensure that the Company is not involved in any human rights violations.

#### **Guidelines**

- 3.1 The Company shall strictly comply with internationally recognized human rights principles at both national and international levels, including labor law requirements in each country in which the Company operates. The Company shall provide a safe, hygienic, and drug-free working environment in accordance with international standards and shall treat all personnel equally without discrimination based on similarities or differences in origin, gender, age, skin color, race, nationality, religion, beliefs, political opinions, disability, family background, or any other status unrelated to work performance. The Company shall also respect personal freedoms and protect personal data.

3.2 The Company shall regularly monitor its business operations to ensure that they are not involved in human rights violations, including participation in and support for internationally recognized practices beneficial to global society, such as the human rights principles of the United Nations.

3.3 The Company shall provide its personnel with knowledge and understanding of international human rights principles in order to incorporate such principles into their operations and shall not support businesses and/or activities that violate international human rights principles.

**4. Code of Conduct on Compliance with Laws, Regulations, Rules, and Relevant Requirements, and Respect for Culture and Traditions**

The Company places importance on compliance with applicable laws, regulations, operational procedures, and relevant requirements in all jurisdictions in which the Company operates, including respect for cultural differences and local customs and traditions. Company personnel are therefore required to study, understand, and respect such laws and regulations, uphold what is right and fair for all parties, refrain from any conduct contrary to local culture and traditions, and report any complaints or indications of non-compliance or violations of applicable laws and regulations.

**Guidelines**

4.1 Company personnel shall study and understand the laws, customs, traditions, and cultures of each locality or destination country prior to travel, including regulations, operational procedures, and requirements directly related to their duties and responsibilities, and shall strictly comply therewith. Personnel shall ensure that samples, products, equipment, travel documents, purposes of travel, and operations in the destination country do not violate laws or conflict with local customs, traditions, or culture. In case of uncertainty, personnel shall seek advice from supervisors and shall not proceed based solely on personal understanding without guidance.

4.2 The Company respects the customs, traditions, and cultures of each locality in every country in which the Company invests and operates its business in compliance with the laws of each relevant country or locality, recognizing that laws, regulations, customs, and traditions may differ in terms of conditions, procedures, and practices.

4.3 Company personnel shall not assist in or support any acts intended to evade or violate laws, regulations, operational procedures, or requirements relating to the Company's business operations. If Company regulations, requirements, operational procedures, or instructions differ from those applicable in a particular locality or country, personnel shall consult the relevant departments before taking any action.

- 4.4 Upon discovering any violation of or non-compliance with laws, regulations, rules, or requirements, personnel shall report such matters to supervisors, relevant departments, or designated complaint channels. If the matter is considered likely to materially affect the Company, it shall be reported to supervisors immediately.

**5. Code of Conduct on Political Neutrality**

The Company maintains a policy of political neutrality and shall not support or engage in any activities favoring any political party, either directly or indirectly. This includes the use of the Company's resources for activities that may compromise the Company's political neutrality and/or cause damage to the Company as a result of involvement in such activities. Nevertheless, the Company respects the rights and freedoms of all personnel to exercise their political rights as good citizens under the law and within the democratic system.

**Guidelines**

- 5.1 The Company places importance on political neutrality and shall not support, participate in, or favor any political party or political authority.
- 5.2 The Company has no policy to use the Company's funds or resources to provide political assistance or support to any political party or politician, whether directly or indirectly, for the benefit of such political parties or politicians.
- 5.3 The Company shall not participate in political campaigns or political advertising for any political party or politician within the Company's premises, nor shall Company resources or assets be used for such purposes.
- 5.4 The Company adheres to democratic principles and encourages Company personnel to exercise their voting rights in accordance with the Constitution.
- 5.5 Company personnel may exercise their political rights as individuals, provided that they do not use their positions within the Company or the Company's name or logo to persuade others to provide financial support or assistance to any politician or political party. Personnel shall exercise caution to avoid any actions that may create the misunderstanding that the Company supports or favors any political party and shall not allow such activities to interfere with their duties or create conflicts of interest.

**6. Code of Conduct on Charitable Donations and Sponsorships**

The Company has established a clear policy regarding charitable donations and sponsorships. Any such activities must be conducted in the name of the Company in a transparent manner, in accordance with the Company's regulations and applicable laws, to ensure that donations or sponsorships are used for public benefit or in line with the intended objectives and are not used for any dishonest or improper purposes.

### Guidelines

- 6.1 Charitable donations to any organization for public benefit purposes shall be made only to reliable organizations and must be conducted in the name of the Company in a transparent manner, in accordance with the Company's established procedures and applicable laws. Such donations shall be subject to monitoring and verification to ensure that they are genuinely used for public benefit and/or in accordance with the intended objectives of the donation.
- 6.2 Sponsorships provided to any organization or activity shall aim to promote the Company's business and/or corporate image and shall clearly specify the Company's name and/or logo. Such sponsorships must be conducted transparently, in accordance with the Company's established procedures and applicable laws.
- 6.3 The Company has established authorization levels regarding charitable donations and sponsorships with clearly defined approval limits and approval hierarchies. Evidence of approvals and accounting records shall be maintained by the accounting department, including reviews by the internal audit department and independent external auditors, in order to ensure that donations and sponsorships are conducted honestly and transparently.

## **7. Code of Conduct on Giving or Receiving Gifts, Assets, or Other Benefits**

The giving or receiving of gifts, assets, or other benefits may be conducted appropriately and within reasonable value limits. Personnel shall not request, offer, promise to offer, receive, or promise to receive gifts, assets, or other benefits in any circumstances that may improperly influence the recipient's decision-making. Such practices shall comply with the guidelines relating to the giving or receiving of gifts, assets, or other benefits.

### Guidelines

- 7.1 Company personnel and/or their family members shall not request gifts, assets, or other benefits from contractors, suppliers, vendors, joint venture partners, or persons connected with the Company's business under any circumstances.
- 7.2 In the event that a supervisor considers it inappropriate to accept any gift, asset, or other benefit, such item shall be returned to the giver immediately. If return is not possible, it shall be submitted to the supervisor for further delivery to the Human Resources Department for allocation for the overall benefit of the Company.
- 7.3 Gifts presented to the Company that commemorate important events of the Company, such as the signing of joint venture agreements, receipt of awards, or souvenirs from social

contribution activities, may be accepted on behalf of the Company by Company personnel, subject to appropriateness.

- 7.4 Company personnel should not give gifts to supervisors, and supervisors shall not consent to or knowingly allow their relatives to receive gifts from subordinates, except for customary gifts exchanged on traditional occasions and of reasonable value.
- 7.5 In cases where assets or other benefits, whether received domestically or internationally, exceed reasonable value limits, regardless of whether such items are designated as personal gifts, but acceptance is necessary to preserve goodwill or relationships, the recipient shall promptly report the matter to their supervisor.
- 7.6 Company personnel shall not offer, receive, or promise to offer or receive any benefits or valuables in order to induce another person to perform or refrain from performing any act, including any conduct that may constitute bribery or similar improper benefits, whether involving fellow personnel or external parties, particularly government officials. The giving of gifts, assets, or other benefits to external persons or government officials, both domestically and internationally, must not violate applicable laws or local customs and traditions.
- 7.7 Departments that interact with business partners, customers, joint venture partners, or persons connected with the Company's business shall regularly communicate this Code of Conduct to such related parties.
- 7.8 Any personnel or supervisors who intentionally fail to comply with or neglect these guidelines shall be deemed to have violated the Company's regulations and may be subject to investigation or disciplinary actions in accordance with the Company's personnel policies and procedures.

## **8. Code of Conduct on Conflicts of Interest**

Any actions undertaken by the Company shall prioritize the best interests of the Company and avoid involvement in activities that may give rise to conflicts of interest, including participation as shareholders, holding positions, financial involvement, or relationships with external persons. Company personnel shall comply with the Company's regulations and prepare conflict of interest reports annually and/or whenever any relevant event occurs during the year.

### **Guidelines**

- 8.1 Company personnel shall make business decisions solely for the best interests of the Company.
- 8.2 Any actions and decisions of Company personnel shall be free from the influence of personal interests or interests of related persons, whether by blood relation or close personal

association. Transactions shall be conducted at fair and reasonable prices as if dealing with external parties. When making decisions or approving transactions that may involve conflicts of interest, personnel shall report such matters to supervisors or approving persons and withdraw from participation in such transactions.

- 8.3 Company personnel shall comply with the Company's procedures and standards consistently and devote their full working time and capabilities to the Company without using Company time to conduct unrelated external businesses.
- 8.4 Company personnel shall avoid financial involvement and/or relationships with external persons that may cause the Company to lose benefits, create conflicts of interest, or obstruct efficient work performance.
- 8.5 The performance of duties and holding of positions by directors, executives, and employees shall not conflict with the fundamental interests of the Company.

## **9. Code of Conduct on Confidentiality and Use of Inside Information**

Protection of inside information is extremely important to the success of the Company and to the career security of all personnel. In order to ensure that disclosures to external parties do not adversely affect the Company's business or reputation, the Company has established measures and control systems for safeguarding inside information. Company personnel are therefore required to maintain the confidentiality of inside information and shall not use such information for personal benefit, even after termination of employment or cessation of duties.

### **Guidelines**

- 9.1 Company personnel shall safeguard inside information and documents that may not be disclosed to external parties, which could otherwise be used for improper personal, family, or associated benefits, such as information affecting share prices, trade secrets, formulas, inventions, or other proprietary information belonging to the Company.
- 9.2 Company personnel shall not use confidential information for personal benefit or for the benefit of others.
- 9.3 Company personnel who receive or work with personal data shall maintain and use such information with due care.
- 9.4 The Company considers information relating to counterparties and agreements with counterparties to be confidential and not subject to disclosure to third parties unless authorized by both the Company and the counterparties.

- 9.5 The Company shall establish strict measures and internal control systems within departments or divisions to prevent significant inside information from being disclosed externally prior to official disclosure. Such measures and controls shall form part of the Company's key risk management measures.
- 9.6 Supervisors at all levels shall be responsible for supervising and preventing the leakage of important Company information or news by personnel under their supervision before official disclosure by the Company.
- 9.7 Sharing of inside information among personnel shall be limited strictly to the scope of duties and responsibilities assigned to such personnel.
- 9.8 Company personnel shall not disclose confidential Company information even after termination of employment or cessation of duties.
- 9.9 If asked or requested to disclose information beyond one's responsibility, personnel shall politely decline to comment and advise the requesting party to contact the department directly responsible for such disclosure in order to ensure accurate and consistent communication.

#### **10. Code of Conduct on Intellectual Property**

Intellectual property is considered one of the Company's most valuable assets and is essential for maintaining competitive advantages in business. Intellectual property includes the Company's identity and brand assets, such as the Company's name, logo, copyrights, patents, trademarks, service marks, trade secrets, operational processes, innovations, content, and other lawful rights. It is therefore essential for the Company to protect such assets and respect the intellectual property rights of others by refraining from infringement or misuse and conducting business in compliance with applicable laws and regulations in all countries in which the Company operates.

##### **Guidelines**

- 10.1 The Company shall conduct its business in compliance with laws and regulations in all countries in which the Company invests and operates, including contractual obligations relating to intellectual property rights, patents, copyrights, trade secrets, and other proprietary information.
- 10.2 The Company shall not infringe upon or improperly use lawful intellectual property rights.
- 10.3 Company personnel responsible for safeguarding trade secrets, confidential formulas, production processes, products, or confidential business methods shall maintain such confidentiality with the utmost care and prevent any leakage of such information.

- 10.4 Company personnel shall respect the intellectual property rights of others and shall not use another person's work, even partially, for personal benefit without prior authorization or appropriate compensation to the rightful owner.

#### 11. Code of Conduct on Information Technology and Communication Usage

The Company provides information technology and communication systems for use in its business operations. All personnel of the Company are required to use such systems properly and efficiently in compliance with applicable laws, regulations, policies, and procedures governing the use of the Company's information technology and communication systems, for the utmost benefit of the Company, while exercising due care to prevent any adverse impact on the Company or its stakeholders.

##### Guidelines

- 11.1 The Company's personnel shall perform their duties using properly licensed computer software only. In the event that work is performed on computers outside the office premises, software licenses must be verified prior to use. Under no circumstances shall unlicensed software be installed or used within the Company.
- 11.2 The Company's personnel shall keep their passwords strictly confidential and shall not disclose them to others in order to prevent unauthorized access. Personnel shall also refrain from using the internet or accessing unfamiliar websites that may pose risks to the Company's computer systems.
- 11.3 The Company's personnel shall not use computers to harm, violate, or disrupt the work of others. The Company shall maintain information technology security systems in accordance with international standards, and all personnel are responsible for safeguarding such systems.
- 11.4 The Company's personnel shall not use computers to spy on, alter, or access another person's files without authorization, or create false evidence that may lead to information theft.
- 11.5 The Company's personnel may use information technology and communication devices for reasonable personal purposes, provided that such use is not for personal business activities, does not affect the Company's business operations, impair work efficiency, or cause inconvenience to others.
- 11.6 The Company's personnel shall use the email and internet systems provided by the Company with due care and solely for the Company's business purposes. Such use shall not damage the Company's reputation, and the Company's name or logo shall not be used in public electronic media without authorization.
- 11.7 The Company's personnel shall not copy copyrighted software belonging to others.

- 11.8 The Company's personnel are responsible for supervising external parties' access to files and software programs only to the extent necessary for work purposes and shall strictly comply with laws relating to information technology and communications.
- 11.9 If the Company discovers any violation by its personnel, and the investigation confirms such violation, the relevant personnel shall be subject to disciplinary action and/or legal proceedings, as appropriate.

## 12. Code of Conduct on Occupational Health, Safety, and Environment

The Company places utmost importance on the health and safety of employees, business partners, customers, communities, and stakeholders throughout its business operations. This begins with the assessment of impacts relating to health and safety, with a focus on ensuring that operations comply with relevant standards and laws, producing quality products that are safe for consumers and employees, reducing waste in production processes, minimizing occupational risks, promoting environmental responsibility, and preventing work-related injuries and illnesses.

### Guidelines

- 12.1 Operations shall be conducted in compliance with applicable laws, standards, regulations, procedures, and guidelines relating to health and safety.
- 12.2 Personnel shall ensure and inspect the readiness of their own health condition, as well as that of colleagues, business partners, and other relevant persons, prior to commencing work. Work must be stopped or suspended immediately if any individual is found to be physically unfit, in order to reduce the risk of occupational or work-related accidents.
- 12.3 Risk assessments shall be conducted prior to commencing work, including studying information relating to unsafe or potentially hazardous working conditions.
- 12.4 In cases where personnel are assigned hazardous tasks or are uncertain about the safety of the work, they should stop or postpone such operations and immediately consult their supervisors or relevant experts.
- 12.5 Personnel shall immediately report to their supervisors any abnormalities in machinery or equipment that may affect health and safety.
- 12.6 Employees shall receive training to cultivate awareness and ensure sufficient competency in supporting the implementation of quality management, occupational health, safety, and environmental management systems.
- 12.7 Information relating to health and safety performance shall be disclosed transparently through appropriate communication channels.

## **Disciplinary Procedures**

In the case of a non-serious violation, the executive or employee concerned shall receive a written warning specifying the nature of the violation and the grounds upon which such violation is based. The executive or employee shall be given an opportunity to respond to the allegation before his/her supervisor. If the matter cannot be resolved, it shall be referred to the Disciplinary Committee appointed by the Chief Executive Officer for consideration, and the decision of the Disciplinary Committee shall be deemed final. In the event of a second violation, or where the executive or employee fails to rectify the initial violation following the written warning, such executive or employee shall be subject to strict disciplinary action, which may include termination of employment.

In the case of a serious violation, including but not limited to bribery, fraud, disclosure of the Company's confidential information or intellectual property to third parties, any act causing damage to the reputation of the Company, or concealment or failure to report material information, discussions, or documents to supervisors, the Company may consider termination of employment without severance pay and without the necessity of issuing a prior written warning.

## **Whistleblowing and Complaints**

The Board of Directors has established channels for whistleblowing and complaints regarding unlawful acts, violations of the Code of Conduct, or behaviors that may indicate fraud or misconduct by individuals within the organization, including reports from employees and other stakeholders. This also includes inaccurate financial reporting or deficiencies in internal control systems. Mechanisms for the protection of whistleblowers are provided to enable stakeholders to participate effectively in safeguarding the Company's interests.

### **Matters Subject to Whistleblowing or Complaints**

- Violations of laws, fraudulent acts, breaches of Company regulations, or violations of the Code of Conduct by directors, executives, or employees;
- Irregularities in financial reports or deficiencies in internal control systems; and
- Matters affecting the interests or reputation of the Company.

### **Whistleblowing and Complaint Channels**

1. Email: [cac@ubonbioethanol.com](mailto:cac@ubonbioethanol.com)
2. Postal Mail addressed to:  
The Audit Committee or Internal Audit Office  
Ubon Bio Ethanol Public Company Limited  
333 Moo 9, Na Di Subdistrict, Na Yia District, Ubon Ratchathani 34160, Thailand
3. Internal Audit Office Hotline: +66 65 836 8845
4. Company Website: [www.ubobioethanol.com](http://www.ubobioethanol.com)

To ensure that the Code of Business Conduct remains current, appropriate to evolving best practices, and consistent with applicable rules and regulations, the Company shall review the Code of Business Conduct regularly or whenever significant changes occur, as appropriate.

Reviewed and announced on 24 February 2026.

*-Signed-*

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(Mr. Palakorn Suwanrath)

Chairman of the Board of Directors

Ubon Bio Ethanol Public Company Limited