Code of Conduct

Primo Service Solutions Public Company Limited

(Approved and reviewed by the Board of Directors at Meeting No. 2/2026 on 26 February 2026)

PRIMO SERVICE SOLUTIONS PUBLIC COMPANY LIMITED
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Part 1 **Message from the Chairman**

Primo Service Solution Public Company Limited is committed to conducting its business in accordance with the highest moral and ethical standards. The Company deeply recognizes the importance of performing our duties with professionalism and integrity. In addition to continuously enhancing our business quality and standards, the Company is dedicated to upholding corporate governance and adhering strictly to our Code of Conduct. We encourage our directors, executives, and employees to perform their duties with ethical integrity, conducting business honestly, transparently, straightforwardly, and in full compliance with all applicable laws and regulations. This unwavering commitment will drive the Company toward stable and sustainable growth, while earning the acceptance, trust, and confidence of our shareholders, customers, business partners, employees, and all stakeholders.

Consequently, the Company has established this Code of Conduct to serve as a guideline and operational framework for our directors, executives, and employees. This Code of Conduct aligns with the Company's vision, mission, philosophy, and core values, which form the vital foundation for sustainable business operations. Furthermore, this Code of Conduct serves as a standard applicable to directors, executives, and employees at all levels. The Company expects everyone to actively participate in upholding this Code of Conduct in accordance with their assigned duties. All directors, executives, and employees must acknowledge, understand, and strictly adhere to these principles to ensure that their duties are performed efficiently, transparently, with accountability, while maximizing the Company's best interests and ensuring fairness to all stakeholder groups.

Part 2 **Rules of Practice**

In this Code of Conduct:

"Company" shall mean Primo Service Solution Public Company Limited and its subsidiaries.

" Subsidiary" or **"Subsidiaries"** shall mean any company that meets any of the following criteria:

(a) A company over which Primo Service Solution Public Company Limited has controlling power;

(b) A company over which the company under (a) has controlling power;

(c) A company under the successive controlling power of the company under (b), beginning from being under the controlling power of the company under (b).

"Controlling Power" shall mean having a relationship in any of the following manners:

(a) Holding voting shares in a company exceeding fifty (50) percent of the total voting rights of that company.

(b) Having direct or indirect control over the majority of votes in the shareholders' meeting of that company, or by any other reason.

(c) Having direct or indirect power to control the appointment or removal of at least half of all directors.

1. Code of Conduct Toward Stakeholder Groups

1.1 Responsibility Policy to Shareholders

The Company is committed to conducting its business correctly and ethically toward shareholders, with a strong emphasis on treating all shareholders equitably. We consistently provide regular, equal, and factual updates on significant and beneficial corporate information to all shareholders, covering both positive and negative aspects, in a timely manner and with sufficient detail to support their investment decisions. Furthermore, the Company encourages shareholders to attend shareholders' meetings to actively participate in key decision-making processes and remain informed of the Company's operations and various activities. We strive to be an excellent representative of our shareholders by operating the business based on honesty, integrity, and sound ethics. We also closely monitor the performance of the Board of Directors, executives, and employees by implementing strict measures to prevent the misuse of insider information for personal gain, thereby safeguarding shareholders' interests and ensuring that no actions infringe upon or deprive shareholders of their legitimate rights.

1.2 Responsibility Policy to Customers

The Company is committed to building utmost satisfaction and confidence for our customers, ensuring they receive services that meet high quality standards. We continuously and consistently enhance our service quality to fulfill customer needs by closely monitoring and tracking customer feedback to drive ongoing service improvements. We promote strong, long-term relationships with our customers to deliver quality services that meet or exceed their expectations at a fair price. The Company strictly adheres to all contracts, agreements, and conditions with transparency and fairness. Furthermore, we maintain a robust customer data management system with strict confidentiality measures, ensuring that customer information is never misused or exploited for unauthorized purposes. We also provide dedicated channels and systems for customers to express their opinions or file complaints regarding our services, with an established corporate process to ensure timely and effective resolution by relevant personnel.

1.3 Responsibility Policy to Employees

The Company deeply values human resources as our asset and encourages employees to perform their duties at their highest efficiency. We provide fair employment conditions and opportunities for career advancement. The Company treats all employees equally and equitably without discrimination based on race, gender, skin color, religion, nationality, age, sexual orientation, physical disability, or any personal characteristics unrelated to their job performance. Furthermore, we ensure that no harassment or intimidation occurs against personnel at any level, by any individual, or through any means.

In addition, the Company provides fair compensation to all executives and employees. Appointments, transfers, rewards, and disciplinary actions are conducted in good faith and based on the knowledge, capability, and suitability of each individual. We prioritize the continuous development of employees' knowledge, abilities, and skills by offering inclusive and regular opportunities. The Company strictly complies with all relevant laws and regulations concerning executives and employees. We maintain a safe working environment and implement operational systems to safeguard our employees' lives, property, and workplace occupational health. Lastly, we welcome employees' opinions and suggestions, providing dedicated channels for lodging grievances in cases of unfair treatment or whistleblowing on potential legal violations, supported by an effective resolution process and robust whistleblower protection measures.

1.4 Responsibility Policy to Business Partners

The Company is committed to treating our business partners with equity and fairness. Every business activity must take into account our corporate reputation, legal compliance, applicable regulations, and established commercial traditions. We strictly honor our contractual obligations with business partners, prioritizing business equality and mutual benefits. Recognizing that our business partners are crucial contributors who help drive the successful and efficient execution of our business, the Company treats them as equals based on fairness and mutual respect.

Furthermore, in the selection process of business partners, the Company prioritizes specific criteria, qualifications, and overall suitability, applying the same objective standards to all candidates to ensure a fair and transparent selection process. We also welcome and provide opportunities for new business partners to collaborate with us. In this regard, the Company strictly prohibits and discourages requesting, accepting, or offering any dishonest or improper benefits in commercial transactions with business partners.

1.5 Responsibility Policy to Competitors

The Company is committed to treating our competitors through a focus on fair and transparent business operations. We adhere to the principles of fair competition in accordance with legal regulations, trade customs, and best practices that align with international standards under the framework of competition laws.

The Company values our business competitors, viewing them not merely as rivals in trade. We also recognize opportunities where existing competitors can become key business partners in the future. Accordingly, the Company has established the following guidelines toward competitors:

- Operate within the generally accepted frameworks and rules of fair competition.
- Support and promote free and fair trade, avoiding monopolies or restricting business partners to trade exclusively with the Company.
- Do not infringe upon the confidentiality or seek trade secrets of competitors through dishonest, illegal, or unethical means.
- Do not damage the reputation of competitors through malicious allegations or defamation.
- Do not enter into commercial agreements or engage in any actions that may result in unfair competition or trade monopolies.

1.6 Responsibility Policy to Creditors

The Company has a policy to ensure fair and responsible treatment toward our creditors, prioritizing the Company's best interests on the basis of fairness, while strictly avoiding situations that could lead to conflicts of interest. We are committed to honoring all agreements and contracts, and consistently providing accurate and truthful information to ensure fairness for both parties.

The Company's practice is to strictly adhere to contracts and fulfill all conditions agreed upon with creditors, particularly regarding the repayment of principal, interest, and the management of collateral. In the event that any condition cannot be met, the Company will promptly initiate negotiations with creditors in advance to find a mutual agreement. Furthermore, we regularly and transparently disclose accurate and complete financial information to ensure creditors' confidence in our financial standing and debt servicing capability.

1.6 Responsibility Policy to Society and the Environment

The Company recognizes that we are an integral part of society, and we hold a responsibility to support communities and contribute to social development. Our policy is to conduct business with a strong commitment to environmental preservation and resource conservation. Furthermore, we emphasize fostering an organizational culture and promoting environmentally friendly behaviors among our personnel, both within and outside the Company, to ensure the most efficient and optimized use of resources.

In addition, the Company strictly complies with government policies and proactively reviews and understands all relevant laws and regulations. This ensures that our business operations do not adversely impact the way of life of local societies or communities.

2. Code of Conduct for Directors, Executives, and Employees

2.1 Policy on Safeguarding Corporate Assets and Interests

1) Safeguarding Corporate Assets

- Every director, executive, and employee have a duty and responsibility to care for and utilize the Company's assets to maximize the Company's benefits, and shall not use them for personal gain, the benefit of others, or any unauthorized purposes.
- Company Assets refers to both tangible and intangible assets, including but not limited to movable property, immovable property, technology, technical knowledge, documents of title, patents, copyrights, information technology systems, and electronic data, as well as confidential information not disclosed to the public, such as business plans, financial projections, and human resources data.
- Executives and employees must acknowledge and strictly comply with the guidelines for the correct and appropriate use of computer and network systems.
- The installation or recording of unauthorized software on the Company's computer systems is strictly prohibited.
- Employees must not provide the Company's software to any third parties, including the Company's business partners, contractors, and customers, nor install such software for personal use. This also applies to employees' internet usage or connections used to transfer data, disseminate pornography, or send and receive information via electronic mail (email) in a manner that violates copyright laws, contradicts the intent of the Company's information technology policies or regulations, or breaches the Computer Crime Act B.E. 2550 (including any amendments thereof) or any other applicable laws.

- During the term of the employment contract, executives or employees must not engage in, omit, or refrain from any actions that cause damage to the Company resulting from intentional falsification, inaccuracy, or misrepresentation of data, information, reports, records, or communications by any means.
- Executives or employees must not infringe upon the intellectual property of the Company and/or any other company that has authorized the Company to utilize such intellectual property under any contract and/or method. This includes, but is not limited to, reproduction, adaptation, public dissemination, or rental of originals or copies, whether for profit or otherwise. If an executive or employee violates this specific Code of Conduct, the Company reserves the right to terminate the employment contract immediately. Furthermore, executives and employees must report to their superiors upon discovering any infringement or actions that may lead to the infringement of intellectual property rights.
- Executives or employees must use the Company's assets with due care, taking responsibility for maintaining any tools or equipment provided by the Company to ensure they remain in good condition, and promptly arranging for repairs in the event of damage.
- Executives or employees must not violate the Company's regulations or orders in a manner that could cause accidents or result in damage to the Company's assets.
- Executives or employees must safeguard the Company's assets from loss or destruction, even if such assets are not within their direct area of responsibility.

2) Safeguarding Corporate Interests

- Directors, executives, and employees should not engage in, operate, or participate in any business that competes with the business operations of the Company.
- Directors, executives, and employees have the right to trade the Company's securities. However, executives must prepare and submit reports of their securities holdings to the Securities and Exchange Commission (SEC) within the prescribed timeframe. Furthermore, directors, executives, and employees who possess material insider information must strictly comply with the Company's policy regarding the use of insider information for securities trading purposes.

2.2 Policy on Safeguarding Confidential Information

1) All methods, processes, ideas, technical knowledge, or any other knowledge and/or techniques related to the business operations or activities of the Company, resulting from conceptualization, research, study, and/or any other actions carried out within the scope of duties and employment contracts of executives and employees in all cases, shall be deemed the sole intellectual property of the Company. This applies regardless of whether such property has been legally registered or notified under intellectual property laws. Consequently, any unauthorized dissemination of such property without the prior written consent of the Managing Director or a person designated by the Managing Director is strictly prohibited.

2) Executives and employees agree to maintain the absolute confidentiality of all "*Trade Secrets*" of the Company that they have acquired or become aware of as a result of their employment with the Company. They shall not disclose or transmit such information to any unrelated or unnecessary third party, nor make unauthorized copies thereof. Furthermore, they shall not engage in any action or refrain from any action that causes damage to the status, reputation, or business operations of the Company. They shall not accept employment, serve as an executive or employee, provide advice, consultation, or assistance, or enter into any agreement with any legal entity or business of any person that is a competitor of the Company, or operates a business identical or similar to that of the Company.

   For the purpose of interpreting this provision, *"Trade Secrets"* means trade information which is not yet generally known or not yet accessible to persons who normally deal with such information, where the information has commercial value due to its secrecy, and the Company has taken appropriate measures to maintain its confidentiality. Such trade secrets may be defined in the regulations, contracts, or any other agreements of the Company currently in effect or to be established in the future, or as prescribed under the Trade Secrets Act B.E. 2545 (including any amendments thereof).

3) Every executive or employee of the Company must maintain the absolute *"Confidentiality"* of the Company's customers, contracting parties, business partners, or any other persons, which they have acquired or become aware of as a result of their employment with the Company. This obligation does not apply if the disclosure of such information is permitted or required by law, such as disclosures made pursuant to a court order or an order from any other government official authorized by law

4) Executives or employees of the Company must be aware of and strictly adhere to data security procedures and methods to prevent the accidental or unintentional disclosure of confidential information.

5) The Managing Director shall be the sole authority to approve any information intended to be presented or disclosed to the public.

6) Executives or employees must strictly comply with and follow the Company's information technology policies, rules, and regulations, including but not limited to the following:

   - Do not infringe upon or interfere with the privacy of others under any circumstances.
   - Do not access the Company's confidential information, except for the specific portions for which the executive or employee is directly responsible.
   - Accessing data and document files of other users without prior authorization is strictly prohibited.

2.3 Conflict of Interest Policy

The Board of Directors has established a policy prohibiting directors, executives, and employees from exploiting opportunities arising from their positions within the Company or its subsidiaries to seek personal gain, or benefits for their families or close associates, whether financial or otherwise. They must avoid entering into connected transactions with themselves, except where necessary for the best interests of the Company and in full compliance with the rules and regulations prescribed by the Stock Exchange of Thailand. Accordingly, the guidelines for directors, executives, and employees of the Company are established as follows:

<u>Acceptance of Money, Remuneration, or Financial Involvements with Business Operators of the Company</u>

- Directors, executives, and employees at all levels must not personally accept money or any form of remuneration or benefits from customers, business partners of the Company, or any individual as a result of performing duties on behalf of the Company. Furthermore, they must not engage in any financial involvements, such as entering into joint ventures or joint trading activities, with customers, contractors, vendors providing goods or services to the Company, or any other persons conducting business with the Company.

- Directors, executives, and employees at all levels shall not borrow or solicit money from customers or persons conducting business with the Company, except for loans obtained from banks or financial institutions in the ordinary course of business as a customer of such bank or financial institution.
- Directors, executives, and employees at all levels must avoid entering into connected transactions with themselves, except where necessary for the best interests of the Company and in full compliance with the rules and regulations prescribed by the Securities and Exchange Commission (SEC) and the Stock Exchange of Thailand. This includes disclosing information regarding the names and relationships of connected persons, pricing policies, transaction values, as well as the opinions of the Board of Directors and the Audit Committee regarding such transactions. Furthermore, entering into inter-company transactions that constitute financial assistance, such as granting loans or providing credit guarantees to companies that are not their own subsidiaries, is strictly prohibited.

Engaging in External Businesses or Other Employment Outside the Company

- Directors, executives, and employees are prohibited from operating or participating in any business that competes with the Company's business, regardless of whether such directors, executives, or employees receive direct or indirect benefits from such activities.

2.4 Anti-Corruption Policy and Measures

The Company has a strict zero-tolerance policy against all forms of corruption. Directors, executives, and employees at all levels are prohibited from engaging in, accepting, or supporting corruption, whether by soliciting, accepting, or participating in corruption directly or indirectly. This restriction applies across all business operations and relevant departments of the Company, and covers actions intended for the benefit of the organization, oneself, family, friends, or acquaintances, or for commercial advantages. No personnel shall induce or omit the performance of their duties to acquire or retain any improper business advantages. Furthermore, the Company will not demote, penalize, or cause any adverse effects to any employee who refuses to participate in corruption, even if such refusal results in the Company losing a business opportunity. The Company regularly reviews the implementation of this Anti-Corruption Policy to ensure continuous alignment with changing business dynamics, rules, regulations, legal requirements, and high ethical standards. Any violation, aid, abetment, or cooperation in corruption will be subject to disciplinary action in accordance with the Company’s regulations and/or relevant legal penalties. All personnel are strictly required to adhere to the Anti-Corruption Policy and Measures.

2.5 Insider Trading and Use of Insider Information Policy

1) Directors, executives, and employees have a duty to report their securities holdings in full compliance with the rules and regulations prescribed by the Stock Exchange of Thailand and the Securities and Exchange Commission.

2) The Company, its subsidiaries, and its associates listed on the Stock Exchange of Thailand must strictly comply with insider trading laws to ensure equality and fairness for all shareholders. To prevent legal violations by personnel at all levels of the Company, as well as their family members who have acquired or may acquire non-public insider information, the Company strictly prohibits such individuals from trading, or persuading others to buy, sell, offer to buy, or offer to sell the shares of the Company, its subsidiaries, and/or its listed associates. This prohibition applies whether the transaction is conducted by themselves or through a broker while they are in possession of material non-public information. The Company and the Stock Exchange of Thailand deem such securities trading to be speculative or an attempt to create an unfair advantage for a specific group of individuals.

3) Directors, executives, and employees must not use material non-public insider information of the Company for their personal gain or for the benefit of others, or act in a manner that suggests seeking benefits for themselves or others, regardless of whether the Company suffers any damages.

4) The Company has established a workplace security system to safeguard data files and confidential documents, and has implemented measures to restrict access to non-public information on a strict "need-to-know" basis. Therefore, it is the direct responsibility of the data owner or the custodian of such non-public information to instruct relevant parties to strictly adhere to these security procedures. Any individual who violates this insider information policy shall be subject to disciplinary action and/or legal penalties, as the case may be.

2.6 Policy on Internal Control, Internal Audit, and Accounting and Financial Reporting

1) Internal Control and Internal Audit Policy

The Company shall establish efficient internal control and internal audit systems, which are subject to data auditing by internal auditors and review by the Audit Committee.

2) Accounting and Financial Reporting Policy

The Company's management is responsible for preparing accurate, complete, and timely financial reports, including both annual and quarterly financial statements, in accordance with Generally Accepted Accounting Principles (GAAP) or applicable accounting standards.

2.1) Accuracy of Business Transactions Recording

- The recording of all types of the Company's business transactions must be accurate, complete, and verifiable without any restrictions or exceptions.
- Accounting entries and business records must reflect the actual facts, and there shall be no distortion or falsification of entries for any purpose whatsoever.
- Personnel at all levels must conduct business transactions in accordance with the Company's rules and regulations. This includes maintaining complete supporting documentation for business entries and providing sufficient, useful, and timely information to enable those responsible for recording, preparing, and evaluating accounting and financial reports to accurately and completely record all types of the Company's accounting and financial transactions into the accounting system.

2.2) Accounting and Financial Reporting

- Directors, executives, and employees must not distort, conceal information, or fabricate false entries under any circumstances, regardless of whether the information pertains to accounting and financial transactions or operational data.
- Directors, executives, and employees must recognize that the accuracy of accounting and financial reports is the joint responsibility of the Board of Directors, management, and the responsible personnel.
- Directors, executives, and employees are responsible for preparing and/or providing accurate business transaction data.

2.3) Best Practices for Legal Compliance

- Relevant personnel at all levels must comply with applicable domestic and/or international laws, rules, and regulations to ensure that the Company's accounting and financial records are accurate and complete.
- Personnel at all levels must adhere to the principles of honesty, objectivity, and professional integrity when maintaining and recording data.

Part 3 Monitoring and Compliance

The Company designates it as the duty and responsibility of every director, executive, and employee to acknowledge, understand, and strictly comply with the policies and practices prescribed in this Code of Conduct.

In the event that a violation of the law, regulations, rules, the Code of Conduct, or relevant Company policies is discovered, or if a superior permits a subordinate to commit such a violation, the executive or employee must report the matter directly to the Human Resources Department. The Human Resources Department shall then proceed in accordance with the steps established under the Company's work rules and procedures regarding such matters.

Furthermore, the Company has established disciplinary action procedures in the event of a violation of the law, regulations, rules, the Code of Conduct, or relevant Company policies, as follows:

Disciplinary Action Procedures

3.1 Non-Serious Violations: The individual will receive a written warning letter specifying the nature of the violation and the grounds upon which the violation is based, while giving the individual an opportunity to contest the allegation before their superior. If the matter cannot be resolved, it shall be submitted to the Personnel Committee, appointed by the Managing Director, for consideration. The decision of the Personnel Committee shall be deemed final. If a second violation occurs, or if the individual fails to rectify the initial violation as instructed in the written warning, the individual will face strict disciplinary action, which may include termination of employment.

3.2 Serious Violations: This includes, but is not limited to, violations such as giving or receiving bribes, fraud, disclosing confidential information or the Company's intellectual property to third parties, engaging in any actions that defame or damage the Company's reputation, or concealing/failing to report material information, consultations, or important documents to a superior. In such cases, the Company may consider immediate termination of employment without severance pay and without the necessity of issuing a prior written warning.

The Company shall review this Code of Conduct every two (2) years to ensure its continued appropriateness under changing circumstances and business environments.

Please be informed and strictly adhere to these guidelines accordingly.

-Signature-

(**Mr. Marote Vananan**)

Chairman of the Board
Primo Service Solutions Public Company Limited

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