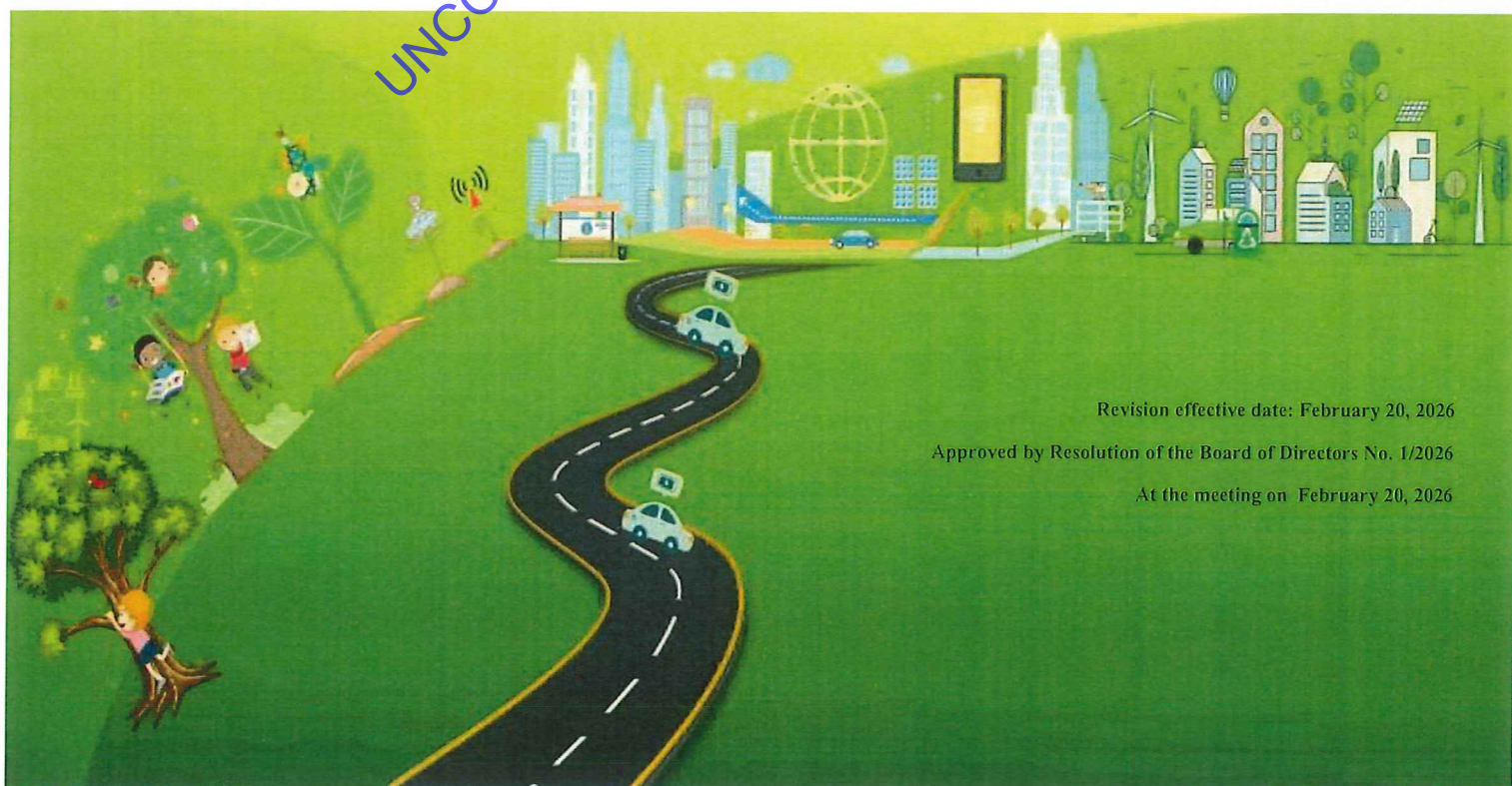




Code of Conduct

ALT Telecom Public Company Limited and affiliated companies

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Revision effective date: February 20, 2026

Approved by Resolution of the Board of Directors No. 1/2026

At the meeting on February 20, 2026



Code of Business Conduct

ALT Telecom Public Company Limited and affiliated companies

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Message from the President

All executives aim to develop the organization in order to maximize the benefits to employees, investors, and business stakeholders in all sectors. To make the organization internationally recognized with a responsible conscience in operational governance includes adhering to duties in a transparent and auditable manner, respecting laws and regulations, morals, culture, and good values, which are widely accepted in society.

Given the constantly changing social and environmental conditions, business operations need to be modernized and adapted to the changes in social rules and values, employee awareness of the Code of Conduct is an important factor to promote and support business excellence.

With a commitment to leading the organization towards sustainable development, the Company has developed a Code of Conduct document to provide a framework to setting guidelines for the governance of all managers and employees.

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Code of Business Conduct

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1) Vision

“Leading the way in infrastructure services for digital and renewable energy businesses”

2) Mission

Provide digital and renewable energy infrastructure services to both public and private sectors to increase service quality, focus on cost efficiency and cost-effective resource utilization, and partner with experts in technology and business networks.

3) Corporate Values

“ALT”

Allying	Become a good alliance with partners, colleagues, public and private clients.
Lifelong Learning	Continuous and consistent learning process.
Transforming	Change the way we think and work for better performance

4) Interpretation

- Company defined as ALT Telecom Public Company Limited and affiliated companies.
- Affiliated company defined as A company limited which Telecom Public Company Limited has control or management right.
- Board of Directors defined as the Board of Directors of Telecom Public Company Limited;
- Executives and employees defined as Executives and employees of Telecom Public Company Limited and affiliated companies.
- Stakeholders defined as A person who directly or indirectly affected by the company's business operations or, on the other hand, those who directly or indirectly affect the business operations of the company, including directors, employees, shareholders, investment firms, customers, partners, financial institutions, society, landowners, government agencies, etc.
- Supplier/Sub Contractor defined as A vendor or contractor who delivers goods and services to the Company.
- Partner defined as Those who have accepted their obligations and have the rights, duties and responsibilities as reflected in the contracts binding with the Company.



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- Customer defined as The Buyer, the User of the Goods and the Recipient of the Services.
- Human Rights defined as The fundamental right that every human being is guaranteed or protected against discrimination only because of physical or mental differences, race, nationality, religion, sex, language, age, skin color, education, social status, or any other matter, and in accordance with the laws of each country or treaty that each country has an obligation to comply with.
- Corruption defined as Bribery, in any form, by offering, promising, giving, promising to give, this includes demanding or receiving money, property or any other advantage that is inappropriate to a government official, government agency, private entity or obligor, whether directly or indirectly, to incentivize such person to perform or refrain from performing his or her duties as a result of obtaining or retaining business or recommending the business to a particular company, or to obtain or retain any other improper advantage .
- Conflict of interest defined as a situation or action in which an employee has such a personal interest that it affects the decision or performance of that employee's position and affects the interests of the company, directly or indirectly.
- Important information defined as Information about the company's business operations that, if disclosed by improper means, may have a significant impact on the company's business operations, on the stock price, or may influence investment decisions, such as information in the financial statements, investment project information that has not been disclosed to the stock exchange, or information about the auction, etc.
- Company property defined as Any kind of property, whether real estate, chattels or any other property owned by the company or the company possesses and maintains the principle of using the property effectively and to the best of its usefulness. It also encourages employees to maintain the property without damaging it or using it for personal gain or for any other person.
- Information Technology defined as Tools and systems used to process and forward electronic information, such as computers, internet networks, email, passwords or programs, etc.
- Intellectual Property defined as Works resulting from human inventions or creations. Patent defined as certification issued by the state to protect inventions or product designs. These include inventions patents, product design patents, and petty patents



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- | | | |
|-----------------|------------|--|
| ● Copyright | defined as | Literacy, artistic, musical, genetic, audio-visual, cinematographic material, sound recordings, broadcasting, such as computer programs, drawings, photographs, articles, etc. |
| ● Trademarks | defined as | Marks, symbols or emblems used on goods or services, including trademarks, service marks, certification marks and collective marks . |
| ● Trade Secrets | defined as | Commercial information that is not publicly known and have commercial value due to its confidentiality nature with appropriate measures have been taken to keep it confidential. |

5) Code of Conduct

This Code of Business Conduct document is designed to provide sound business practices based on fairness for management and employees of ALT Telecom Public Company Limited and affiliated companies to adhere together as part of the Staff Regulations.

1. Human Rights without Discrimination

Principle

The Company recognizes the importance of respecting human rights by treating everyone equally without discrimination, supporting and promoting human rights, avoiding actions that violate human rights. The Company also recognizes the importance of labor by treating employees in accordance with labor laws and regulations related to labor fairly.

Practices

- 1) Treat each other with respect and equally without discrimination regarding physical, mental, racial, nationality, religion, sex, language, age, skin color, education, social status, or any other matter.
- 2) Take precautions in the performance of their duties to prevent the risk of human rights violations, either by the company or those involved in the business. Monitoring human rights respective actions and reporting to superiors when encountering such risks to eliminate or prevent human rights violations.
- 3) Equally and non-discriminatory treatment in all processes of employment, from recruitment, remuneration, working hours and holidays, assignment, performance appraisal, training and development, progress planning, etc.
- 4) Do not use forced labor, including physical or psychological abuse by employees, by means of coercion, detention, threats, harassment or violence of any kind.



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2. Environment, Health and Safety

2.1 Environment

Principle

ALT Telecom Public Company Limited and affiliated companies are committed to sustainable business practices based on environmental responsibility, recognizing and paying attention to the prevention and reduction of environmental impacts resulting from business operations in all processes from production, installation, and service provision, as well as supporting the development of innovations to help reduce the potential impact on the environment. The company has set goals for the valuable use of natural resources while preparing plans and measures to reduce environmental problems.

Practices

The Company recognizes the importance of establishing a balance between social responsibility, environment, and economic development, by adhering to the duty and responsibility to protect and maintain the environment inside and outside the establishment. Therefore, the following environmental guidelines have been established.

- 1) Strictly comply with customer regulations, including local environmental laws and company regulations.
- 2) Conduct business in an environmentally and socially responsible manner with a focus on production, installation and service processes, as well as the use of tools to perform business activities with minimal impact on the environment and surrounding communities.
- 3) Establish performance monitoring and operational environmental impact, and support continuous improvement in performance by setting as one clear goal and action plan.
- 4) Support awareness raising by providing environmental education training to employees and stakeholders on preventing negative environmental impacts.
- 5) Communicate policies and requirements to business partners to ensure that service providers, contractors, and business partners comply with appropriate environmental standards and practices and comply with applicable environmental policies, rules, and regulations.
- 6) Disclosure of environmental performance to the public in sustainability reports or other forms of disclosure approved by the organization's senior management by signing and approving the environmental policy to be used as a guideline throughout the organization.
- 7) This policy applies to the Company by publicizing it to stakeholders and must be measured and monitored for compliance by internal and/or external independent agencies. The Company considers it the duty and responsibility of employees at all levels and key business partners to strictly comply with the policy.



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2.2 Health and Safety

Principle

The Company dedicates great importance to the health and safety of its employees, business partners, customers, communities and stakeholders throughout the business process, starting from the assessment of health and safety-related impacts before any investment or venture is made. Including maintaining the safety of establishment, production process, technology, machinery, equipment, raw materials and does not affect health when using. As well as raising awareness of such matters to employees and related parties to implement the practices in various matters.

Practices

- 1) Operate in accordance with laws, standards, regulations and practices on health and safety, and cooperate in the implementation of global agreements on matters to help prevent or minimize their impact.
- 2) Supervise and check the availability of own health, co-workers, business partners, and other persons involved before performing the work and must immediately stop or order a stop if physical fitness deteriorates to reduce the risk of occupational or work-related accidents.
- 3) Assess the risks before starting work and learn about unsafe or hazardous working conditions in order to plan or prepare appropriate safeguards.
- 4) In the event of a dangerous assignment, or if there is no certainty of occupational safety, the work should be stopped or delayed and a supervisor or specialist should be consulted immediately.
- 5) Immediately report to your supervisor for any malfunctions in the machinery, equipment and workplace that may affect health and safety.
- 6) Supervisors are directly responsible for occupational safety and must establish or disseminate guidelines for preventing and controlling accidents, including taking care of the health of employees, in accordance with the risks of their work.
- 7) Transparently share health and safety performance information through appropriate channels and provide opportunities for communities and stakeholders to provide feedback for projects that may impact communities and societies.
- 8) Encourage awareness-raising about maintaining the health and safety of associates and surrounding communities through appropriate channels, such as meetings, training sessions, workspace exploration, or social activities with the community on various occasions.

2.3 Safety of Goods & Service

Principle

The company ensures that the products and services meet or exceed the safety standards required by law. There are standards consistent with industry standards up to the relevant international standards and meet the requirements



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agreed with the customer from designing to manufacturing and providing information or warnings about the goods, services, and methods of use that are accurate enough for the customer's safety throughout its Life Cycle. Paying attention to the safety of the products that the company hires to manufacture, import, and include in the promotion.

Practices

- 1) Producing, installing, and servicing products while taking customers' safety into account throughout its lifetime. Suppose there is any change in the way the goods are manufactured and serviced that affects safety. In that case, associates must first obtain approval of the supervisor or person in charge, details, and justifications must be documented for reference.
- 2) Manage and store safety information of goods and services under responsibility for verification purpose.
- 3) Report immediately to the supervisor if any employees acknowledge or are concerned about the safety of goods and services resulting from the product manufacturing process, service process, or situations that may pose a danger to the customer's safety.
- 4) Complaints regarding the safety of goods and services are welcome, and timely harmonization or improvement is required. In case of restrictions or time-consuming solutions, the responsible person must promptly report the information and status to the customer, including periodic reports on the progress of corrections.

Consumer protection and liability for damages arising from unsafe products

The Consumer Protection Act B.E. 2522 (as amended) aims to establish the rights of consumers and the duties of manufacturers or service providers to ensure fairness to consumers. Under this Act, criteria have been established to protect the rights of consumers such as

- Consumer protection in advertising by prohibiting the use of unfair advertising practices, such as false or misleading statements about a product or service.
- Consumer protection in labeling by setting standards for the content of labels, including accurate information about the product, the name of the manufacturer or importer, and necessary instructions or warnings.

3. Anti-corruption

Principle

The conduct of the Company's business with its business associates must be conducted in a correct, direct, transparent, honest, verifiable and non-corrupt manner, in compliance with relevant laws and the Company's Anti-Corruption Policy, and without causing any accusation or dishonour to the Company.



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Practices

Avoid corrupt act and take caution in high-risk work processes such as sales and marketing, procurement, investment project work, contracting, giving and receiving gifts, entertainment, giving donations or grants, etc.

- 1) Not neglecting or ignoring any acts of corruption related to the company. Such action must be reported to the superior or person in charge and cooperate in the investigation of the facts.
- 2) Act transparently, accurately, and lawfully by providing or receiving donations or grants, ensuring that donations or grants are not used for bribery.
- 3) Be careful when transacting with any person, entity, or organization that has suspicions of corruption.

4. Gifts & Entertainment

Principle

Receiving or providing benefits, including property, services, facilitation or entertainment, to business associates must comply with local or national customs and applicable laws, be of reasonable value, and not constitute as an incentive to make an unjustified decision.

Practices

- 1) Before accepting or providing gifts and entertainment to a business associate, make sure that they are of the appropriate value for the occasion and that local laws, regulations, notices, or customs allow them.
- 2) Do not accept or provide property, services, or entertainment that may influence or motivate any decision and cause the unjustified duty.
- 3) Proof of payment must be provided showing the value of the property, service or entertainment in order to be verified.
- 4) If delegated or authorized by a superior to assist an external entity, hospitality may be provided in accordance with guidelines or standards established by that external entity.
- 5) Be careful in both the provision of hospitality to superiors or individuals/internal entities and the receipt of hospitality from subordinates or individuals/internal entities by providing and receiving such hospitality must not motivate any unfair decision.

5. Conflict of Interest

Principle

The Company always strives to do the right thing with the best of intentions, so employees must act in the Company's best interests, under the rule of law and ethics, avoiding actions that may have personal benefits that may affect any decision.

Practices

- 1) Avoid operating a competitive business or being a partner, shareholder, decision-maker, director, or executive in a competitive industry or similar to the business of the Company.



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- 2) Do not involved in transactions with related parties, such as family, close relatives, close associates, or partners, even if they are beneficial to the Company;
- 3) Do not exploit the information or things that you or others know due to their job role and responsibilities.
- 4) Avoid engaging in conduct, whether involving a business associate of the Company or an employee of the Company, that could create a conflict of interest for the Company.
- 5) Avoid working for their personal gain outside of the company, which may have an impact on their job, responsibilities, and image.
- 6) Employees are prohibited from regularly using their working hours to search for contact information or trade in any securities or assets for their own benefit or that of any other person, and not for the benefit of the Company.
- 7) In the event that there is an item that may cause a conflict of interest with the company, it must be reported to the supervisor immediately.

6. Political Expression

Principle

The Company is politically neutral without any form of financial or other support to political parties, political coalition groups, political authorities or candidates for political office, whether directly or indirectly at the local, regional or national level. However, the Company respects the political rights of its employees as good citizens in accordance with the Constitution, whether they vote for elections or are members of political parties.

Practices

- 1) Exercise political rights on behalf of yourself and avoid actions that mislead others to act on behalf of the company.
- 2) It should not be expressed in any way that misleads others that the Company is associated with or supports political action, political parties, political coalition groups, political authorities or political candidates.
- 3) Do not dress in employee uniforms or use symbols that could be understood by others as company employees to attend political meetings or gather in public places of a political nature.
- 4) Avoid expressing or expressing political opinions in the workplace, as this may create work conflicts.

7. Information & Assets

7.1 Personal Information

Principle

The Company respects the privacy rights of those involved. Therefore, personal information of employees and those involved in the conduct of business, such as personal status, biography, work history, financial information, contact information, health information, or other personal information, must be protected from being used, disclosed, or transferred to others in a manner that violates legal rights.



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Practices

- 1) The personal information of another person must be treated with respect. If the personal information of another person is to be used, disclosed, or transferred, that person's consent must be obtained and ensure that it is not a violation of legal rights.
- 2) Persons in charge of keeping information or custody of the Company must protect the personal information of employees and those involved in the conduct of business. Therefore, the use, disclosure or transfer of personal information of employees and those involved is only necessary for normal work duties and does not violate the rights under the law.

7.2 Confidentiality of Information

Principle

The Company recognizes the importance of information management within the organization. By recording or reporting information must comply with the guidelines set by the company, be accurate, and complete in accordance with the law. The information retention must be carried out in a safe condition and can be used, referenced, or utilized by the company when required.

Practices

- 1) Record the information accurately, completely, and in a timely manner, observing the guidelines established by the company or established in the law, such as tax laws, accounting standards, etc.
- 2) Report information accurately and truthfully.
- 3) Take care of important documents and confidential information with specific methods defined at each level, each kind or type of information, and ensure safe and proper storage, both internal information and information of business associates such as customers, partners or business partners, etc.
- 4) Retain data on time and in accordance with the guidelines set by the company or under the requirements of the law, keeping it carefully and systematically for ease of use. At the end of the period during which the data must be retained, the person in charge of managing information must appropriately arrange for destruction suitable to each type of data or document.

7.3 Insider Trading/Dealing

Principle

The use of inside information that is important information must be carried out appropriately, taking into account the impact on stakeholders as a whole and the accuracy required by law, and must not be used for personal or other gain.

Practices

- 1) Do not use internal information that has not been made public in the purchase of securities, this can be considered as exploiting third parties at any time.



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- 2) Not to advise or comment on the purchase of the Company's securities, except in relation to the functions entrusted to the Company.
- 3) Never disclose or transmit internal information to anyone not related to it, including family members, relatives, friends, etc.
- 4) Employees in entities involved in the preparation of financial statements, including family members, may not trade in the Company's securities during the period prior to the release of the financial statements or other disclosures that may affect the price of the Company's securities.

7.4 Assets Management

Principle

All Company property, whether real estate, chattels or any other property owned by the company or the company possesses and maintains the principle of using the property effectively and to the best of its usefulness. It also encourages employees to maintain the property without damaging it or using it for personal gain or for any other person.

Practices

- 1) Use the Company's assets effectively and to the benefit of the Company;
- 2) No misappropriation or illegal usage of company property
- 3) Maintain and protect company property from damage or loss.

7.5 IT Security

Principle

The company emphasizes the effective and secure use of information technology systems in accordance with the information technology policy and regulations. The information technology must be maintained from being abused or used without rights.

Practices

- 1) Use information technology systems, including information contained in the system, for the benefit of the company. Avoid using the system that may violate the right to normal use of others, in matters not related to work or may affect the performance of the system
- 2) Do not use the system to access or transmit information that contains material against good morals, gambling, affects national security, or violates the rights of others.
- 3) Use the system in accordance with the rights granted. Retain and not allow others to use the password to access the system.
- 4) Avoid opening unknown files and using data loggers that have been used on a computer that is suspected of containing a computer virus or other malicious software.



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- 5) Avoid manual installation of computer programs, modifications to system settings that may compromise security. If you experience problems or find any abnormalities, contact your IT administrator.

7.6 Intellectual Property

Principle

The Company considers intellectual property to be valuable property of the Company. Employees are obliged to strictly comply with the Company's intellectual property policy. The Company's intellectual property must be protected and maintained from unauthorized use or dissemination, and must respect and not violate the intellectual property rights of others.

Practices

- 1) Maintain the Company's intellectual property from being infringed, disclosed, modified, or otherwise made without the Company's permission.
- 2) Respecting and not infringing the intellectual property of others, examining works that are the rights of third-parties that have been or will be used against the company.
- 3) In order to enter into a contract or any law, intellectual property rights should be explicitly agreed upon. If in doubt, consult with the company's intellectual property administrator or the company's legal counsel.
- 4) Cooperate in demonstrating or obtaining protection of intellectual property rights owned by the Company;
- 5) Report to the supervisor or person in charge of the intellectual property for any act deemed to be a violation of rights, which may lead to a violation of rights or an action that may cause a dispute about the company's intellectual property.

8. Disclosure & Communication

8.1 Disclosure

Principle

Company disclosure of information upholds the principles of fairness, transparency, and verifiability by ensuring accurate, clear, consistent, legal, and equitable disclosure, whether disclosed in writing, verbally, in a press conference, or through any other means.

Practices

- 1) Disclosures that may have any impact on the Company must be made directly by the competent authority in that regard, unless delegated by the competent authority to the disclosure itself.
- 2) In the event of disclosing critical information that has not been made public, the person who has the right to disclose the information must disclose it carefully, accurately, in total, and on time while ensuring that the various stakeholders are adequately equally informed.
- 3) Other disclosures must be based on fact and must not be intended to misinterpret the facts.



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8.2 Communication

Principle

Company communications, including internal and external company brand communications, brand marketing communications, company branding and social media communications, must be conducted appropriately, truthfully, with due regard for all stakeholders, and without damaging the company, in strict compliance with the brand communication guidelines and the company's social media policy.

Guidelines

- 1) Communicate by demonstrating social, environmental, and social responsibility in the business.
- 2) Never use a marketing communication method that compares directly to a competitor's goods or services.
- 3) Do not present things that may cause discrepancies in society, such as national institutions, religious institutions, monarchical institutions, politics, beliefs, international relations, sexual opinions or matters contrary to morality and good culture, social inequality, discrimination and human rights violations.
- 4) Do not exaggerate in a way that aims to mislead consumers about the quality of products, services, or other characteristics of the organization, unless using techniques that they can recognize are not real, but that create interest in public relations advertising and should clearly indicate to the consumer that they are not real.
- 5) Do not ignore but rather monitor the organization. In case of finding communication that alludes to the organization or practices that may affect its reputation, including improper use of symbols, or may cause damage to the brand, immediately notify the responsible department or supervisor.
- 6) When disseminating information or making personal comments on social media, it is important that personal comments are clearly stated with care as employees of the company.

9. Business Transaction

9.1 Interacting within the affiliated company (Connected Transaction)

Principle

Business operations or operations that are intercompany transactions in the group must take into account the laws and regulations issued by government agencies, including the regulations and operating rules of the company.

Practices

- 1) Learn the rules, regulations, procedures, authorization that companies need to understand completely before execute.
- 2) Do not take action if there is a request to skip a step or ignore any process that needs to be taken normally.
- 3) Implement practices and processes for considering and approving transactions between related or potential conflict of interest items in order to maximize the benefits to the company according to the criteria established by law.



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- 4) Conducting transactions between each other fairly, reasonably, and without transferring interests between affiliated companies.

9.2 Company transactions with third-parties (Normal Transaction)

Principle

Transactions with third-parties must be carried out in accordance with the criteria and processes established by law, regulations issued by government agencies and company policies, as well as approve in accordance with the Company's operating procedures. In addition, the agreed conditions must be met in a straightforward, transparent and verifiable manner. Avoid transactions that may cause damage to the Company or third-parties.

Practices

- 1) Studying, understanding and following policies and practices towards different groups of stakeholders.
- 2) In the services provisioning, the procedures set out in the regulations and the way in which the company is supplied shall be carried out, and consideration shall be given to selecting the legal person first in order to avoid having to deal with individual person, unless it is the case that individual expertise or for the benefit of any of the company's operations is required.
- 3) Transactions must take into account the market value, price, quality and services received, do not discriminate or discourage doing business in an unfair or unlawful way.
- 4) Avoiding transactions that may impact society or the environment, or that may damage the company's reputation, even if the transaction would result in a business advantage.
- 5) In transactions that are not related to the company, do not imply the name of the company, its board of directors, management or employees, even if it does not directly affect the company.

10. International Transaction

Principle

The import-export of goods or any transactions of foreign related companies must strictly comply with relevant laws, such as import and export laws, customs laws, laws on product safety, consumer protection laws, and relevant company rules and practices.

Practices

- 1) Study and track the information of customers and business partners who will be in business with the Company. Avoid doing business with customers or business partners who do not comply with relevant laws or have unsatisfactory business operations.
- 2) Always monitor the transactions that occur in a timely manner in order to comply with the law.
- 3) Report information with evidence related to import or export to the person responsible for import or export, such as the company or government agencies, etc., by making sure that the evidence has accurate information.



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11. Antitrust/Anticompetitive Practices

Principle

The Company strives to conduct its business fairly, following the ethics of the business and the laws of competition in the various countries in which the Company operates, both to its customers and its partners, and in accordance with the practices of the relevant companies.

Practices

- 1) Do not enter into any agreement with any competitor or person of a nature that reduces or restricts competition.
- 2) In the event that the company is the dominant in any market, such dominance must not be exercised in an unfair way, such as restricting the customer's choice to buy products or use services, including setting prices, or unfair terms of sale of products or services.
- 3) Competition law is a complex law that varies from country to country, so it is important to understand the practices related to company competition in case of doubt and discuss them with the company's legal counsel from the beginning.

12. Money Laundering Prevention

Principle

The Company adheres to the rules and laws related to the prevention of money laundering. That is, the Company will not transfer or transform property or encourage the transfer or transformation of property related to wrongdoing, to prevent anyone from using the Company as a channel or as a tool for transferring, concealing or protecting the source of illegally acquired property.

Practices

- 1) Before entering into a transaction with a counterparty, make sure that the source of the funds is obtained lawfully.
- 2) Never transfer funds to an unknown account or accept transfers of an unusual nature, especially from a country that is not involved in the transaction.
- 3) Cases of seeing unusual transactions must be reported immediately to the supervisor.

6) Whistleblowing System

The company has a complaint and whistleblowing system. In the event that you know or see an action or suffer damage related to corruption, non-compliance with laws, regulations, company regulations and codes of conduct, you can provide information about such action by:



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1. Notify the complain receiver through the designated complaint channel. This must not be a false or bullying complaint which the company considers to be disciplinary according to the personnel management regulations.
2. The company has procedures in place when complaints are received and protection is provided to employees who raise complaints and whistle-blowers.

Complainant/informant protection measures

The Company has a policy of protecting and providing fairness to employees who provide information or whistleblowing to fact-finding working groups, investigation committees, or fail to comply with laws, rules, regulations, the Company, and the Whistleblowing Policy .

1. In the event that the complainant and the contributor reveal the company name, the company can report progress, clarify the facts or mitigate the damage more quickly and conveniently.
2. The Company considers the relevant information to be confidential and will disclose it to the extent necessary, taking into account the safety and damage of the reporter, the source of the information or persons involved.
3. In the event that the complainant considers that they may be unsafe or may suffer damage, the complainant can request the company to provide appropriate protective measures, or the company may provide protective measures without the complainant having to request if it considers that the matter is likely to cause suffering, damage or unsafe.
4. Those who suffer will be provided with appropriate and fair reliever.

Measures to prevent retaliation, and mitigate damage to the reporter, complainant, or cooperating party in reporting a code violation.

The Company has measures to prevent retaliation, and mitigate the damage to the reporter, complainant, or cooperating party in reporting a Code of Conduct violation. The reporter, complainant, or cooperating party in the investigation of the facts will be protected and justified from notifying the Company of information or useful clues about corruption, non-compliance with laws or regulations issued by governmental agencies, as well as any violation or non-compliance with regulations or codes of conduct established by the Company, as follows:

1. Reporters, complainants, or collaborators can choose to remain anonymous if they see that the disclosure will cause any unsafe or damage, but if they reveal themselves will make it easier and faster for companies to report results or mitigate damage.
2. The Company considers the relevant information to be confidential and will only disclose it to those responsible for the resolving of the problem, taking into account the safety and damage of the reporter or person concerned.



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3. In the event that the complainant considers that they may be in danger of suffering or may suffer damage, the complainant can request the Company to establish appropriate safeguards, or the Company may impose safeguards on the complainant without request, if it considers that they are likely to suffer damage or safety.
4. Those who suffer will be provided with appropriate and fair reliever.

Process flow chart when receiving a complaint

Complaint channels

- Through the website www.alt.co.th Complaints and Whistleblowing System
- Verbally or in writing/E-mail address/Mail (either expose or anonymously)

Channel 1 by mail, send to

ALT Telecom Public Company Limited, 52/1 Moo 5 Bang Kruai - Sai Noi Road
Bang Si Thong Subdistrict, Bang Kruai District, Nonthaburi 11130
address to

- Chairman of the Audit Committee; or Audit Committee; or Audit Committee Secretary

Channel 2 by E-mail at

- Audit Committee E-mail address: auditcommittee@alt.co.th

Complaint Recipients

- Your trusted superiors at all levels.
- Deputy Director of HR department
- Secretary of the Board of Directors
- Audit committees
- Company's board of directors

The Board of Review and Investigation

1. Investigation

- The complain receiver brought the information to the Review and Investigation Committee.
- In principle, it must be assumed that the complainant was in good faith.
- The preliminary fact-inquiry and briefing take about 30-60 days (depending on the complexity of the investigation).
- If the complainant reveals himself/herself, the results of the investigation shall be communicated to the complainant within a deadline of 7 working days from the date of conclusion.

2. Consideration and approval of penalties

The Board of Review and Investigation, or the Board of Director, is the competent authority.



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3. Facts reporting

Reports shall be made, as appropriate, to the line supervisors, managing directors, audit committee, and the board of directors respectively.

7) Scope of Enforcement

This document will be distributed and signed by all current and future employees of the organization. All employees must act in strict accordance with the established practices. The details in this document may not cover all business content, but can be used as a guide. If anyone has any questions about the message or its enforcement, please contact their superior or HR manager directly. In the event that an employee fails to comply with or violate this principle, or receives a disciplinary warning, this may result in disciplinary action.

8) Compliance & Revision

8.1 All directors, executives, and employees are obliged to know, understand and strictly comply with the Code of Business Conduct. If they are found to have violated or acted against the Code of Business Conduct, the Company will consider and act by verbal or written warning. And in the event that such acts are contrary to the rules and regulations of work, the Company will consider punishment according to the nature of the offense.

8.2 All directors, executives and employees are responsible for signing off on this Code of Business Conduct as an employee and for acknowledging and understanding the Code of Business Conduct as it changes. The Company will publicize it and implement it.

8.3 All directors, executives and employees must not take any action of a nature that circumvents the maintenance of the Code of Business Conduct or involve family members or close relatives in any action that indirectly circumvents the observance of the Code of Business Conduct of the Company for personal gain.

8.4 Executives and supervisors must set a good example in complying with the Code of Business Conduct and have a duty to monitor and encourage their subordinates to comply with the Code of Business Conduct.

8.5 The Nomination, Remuneration and Corporate Governance Committee shall assess the adequacy and appropriateness of the Code of Conduct. Any material amendments thereto shall be subject to the approval of the Board of Directors.



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9) Penalties

The Company designates the Management Committee as the competent authority and imposes disciplinary sanctions on employees who commit or fail to comply with the rules established by the Company. The Company imposes 4 disciplinary sanctions as follows:

- Verbal warning with document record
- Warning Letter
- Suspension without pay
- Termination without compensation

Effective February 20, 2026

(Mrs. Preeyaporn Tangpaosak)

President

ALT Telecom Public Company Limited



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Revision/Update Status

Revision:	Effective Date	Revision Details
00	16/07/2015	New Document
01	12/11/2016	Edit company Vision, Mission Add Article 8: Supervision to be followed and reviewed Article 6: Competition Code of Conduct, Conflicts of Interest, Trading in Company Securities and Usage of Insider Information, Prevention of Corruption and Bribery, Gifting, Receiving Gifts, and Compensation
02.	27/02/2017	Review up to date
03	23/02/2022	Update the entire book for details
04	21/02/2023	Update mission, values, practices, and contact
05	25/02/2025	Update Section 5 of the Business Ethics Code by removing the examples in accordance with the Code of Conduct and Section 6 by removing the requirement to accept complaints and report information via the Website.
06	20/02/2026	- Update Section 6: Whistleblowing and Complaint Submission Channels via the Company Website - Amendment to Clause 8.5