



Code of Conduct

Pi Securities Public Company Limited



Introduction

As Pi Securities Public Company Limited (“the Company”) is a subsidiary of Country Group Holdings Public Company Limited, the Company has been adopted and applied same code of conduct. In addition to complying with laws and regulations prescribed by relevant government authorities and regulatory bodies, a key essential element is the organization upholds strong business ethics. The Company therefore regards its business code of conduct as a fundamental principle and is committed to ensuring sustainable and stable growth.

The business code of conduct has been established to serve as a guideline for directors, executives, and employees of the Company and its subsidiaries. It is intended to guide appropriate conduct and serve as a good example in the fair performance of duties, grounded in integrity, morality, and ethical principles. It also emphasizes responsibility to oneself, colleagues, supervisors, subordinates, and all stakeholder groups.

Pi Securities Public Company Limited



Code of Conduct of Pi Securities Public Company Limited

The Company has established a business code of conduct as an ethical standard for directors, executives, and employees at all levels of the Company and its subsidiaries in performing their assigned duties. Directors and executives are encouraged to act as role models in complying with the business code of conduct. The Company emphasizes fair treatment of all stakeholder groups in accordance with its good corporate governance policy. Directors, executives, and employees are required to acknowledge, understand, and strictly adhere to the code to ensure that their duties are performed effectively, transparently, honestly, and in the best interests of the Company, with fairness to all stakeholders, and in a manner that is accountable and verifiable.

(A) Code of Conduct for Stakeholders

Practices toward stakeholder groups include shareholders, business partners, employees, creditors, and competitors, as well as procurement of goods and services, environmental responsibility, safety and occupational health, participation in community and social development, anti-corruption measures, and whistleblowing, in accordance with the Company's principles of good corporate governance.

(B) Conflict of Interest

The Company has established controls and preventive measures over transactions, including related party transactions, to avoid conflicts of interest, by implementing appropriate policies and procedures and disclosing related party transactions in accordance with the requirements of relevant regulatory authorities.



Code of Conduct of Directors and Management

The Company's management consists of the Board of Directors and executives at the level of Deputy Managing Director and above, is entrusted by shareholders with the responsibility to establish policies and to oversee, supervise, and control the Company's operations effectively in order to achieve its business objectives. To demonstrate management's commitment and intention to conduct business with integrity and transparency, leading to the Company's success and acceptance by all stakeholders, the Company has therefore established a "Code of Conduct for Directors and Executives" as a guideline for executive conduct, as follows.

1. Organization

- 1.1 Perform duties to the best of one's ability in compliance with applicable laws, the Company's objectives, and the articles of association of the Company and its subsidiaries.
- 1.2 Uphold ethical principles and perform duties with honesty, integrity, and moral courage to express opinions on what is right.
- 1.3 Exercise independent judgment in performing duties, free from management influence or other conflicting interests.
- 1.4 Maintain political neutrality and refrain from political affiliation, political influence, or any actions that may be perceived as support for political parties on behalf of the Company.
- 1.5 Refrain from disclosing the Company's confidential information to external parties.
- 1.6 Devote sufficient time to attend Board of Directors meetings, shareholders' meetings, and relevant subcommittee meetings.
- 1.7 Promote ethical conduct, professional ethics, and good corporate governance among employees.
- 1.8 Conduct oneself appropriately as a representative of the organization in dealings with external parties and help promote the Company's image when appropriate.
- 1.9 Provide information or give interviews to the media or the public only when duly authorized by the Company.
- 1.10 Ensure that the Company and relevant subsidiaries comply with applicable rules and procedures governing related party transactions and the acquisition or disposal of assets of listed companies and their subsidiaries.

2. Shareholders

- 2.1 Perform duties in accordance with resolutions of shareholders' meetings and in the best interests of shareholders as a whole.



- 2.2 Act with honesty, integrity, and fairness, and treat all shareholders equally for their collective benefit.
- 2.3 Oversee the management of the organization with due care and prudence to prevent damage or adverse impacts on shareholders.
- 2.4 Safeguard shareholders' interests and ensure that their rights are respected and treated equally.
- 2.5 Disclose information or report the Company's status to shareholders accurately, completely, and in a timely manner.
- 2.6 Refrain from disclosing the Company's confidential information to external parties and from seeking personal benefits or benefits for related persons.

3. Conflict of Interest

- 3.1 Refrain from having personal interests in business decisions and from seeking personal benefits or benefits for related parties through the use of any non-public Company information.
- 3.2 Refrain from engaging in any actions that may give rise to conflicts of interest with the Company, and take measures to prevent such conflicts of interest.

4. Society and Cultural Traditions

- 4.1 Refrain from any actions that may cause harm to society as a whole.
- 4.2 Demonstrate social responsibility by establishing business policies that do not conflict with cultural traditions, customs, or public morals.

5. Subordinates

- 5.1 Maintain a positive attitude toward subordinates and supervise them with kindness and fairness, without abuse of authority.
- 5.2 Demonstrate leadership and act as a credible role model for subordinates.
- 5.3 Provide knowledge, guidance, and advice, and willingly and sincerely listen to the opinions and suggestions of subordinates.
- 5.4 Support and promote subordinates' career advancement, job security, and overall well-being.



Code of Conduct of Employees

The Company recognizes that all employees are valuable resources and a key driving force in achieving its objectives and long-term success. Accordingly, the Company is committed to promoting, supporting, and developing employees to enable their continued growth and advancement.

To encourage ethical conduct and raise employees' awareness of appropriate behavior, and to demonstrate the Company's commitment to transparent, ethical, and responsible business practices toward stakeholders, the Company has therefore established an "Employee Code of Conduct" as a guideline for the conduct of employees of the Company and its subsidiaries, as follows.

1. Organization

- 1.1 Perform duties with honesty, integrity, and fairness for the best interests of the organization and its stakeholders.
- 1.2 Perform duties in compliance with applicable laws, the objectives, articles of association, rules, orders, and notifications of the Company and its subsidiaries.
- 1.3 Maintain a positive attitude toward the Company and its subsidiaries, and respect and comply with supervisors' instructions.
- 1.4 Perform duties competently, efficiently, and in accordance with professional standards applicable to one's position, with due care and responsibility.
- 1.5 Compete fairly with other individuals or organizations in accordance with applicable laws and regulations, and refrain from defaming or making false accusations against others.
- 1.6 Refrain from engaging in any business that competes with the Company.
- 1.7 Refrain from seeking personal benefits or benefits for related parties from one's position or from the use of the Company's confidential information.
- 1.8 Use the Company's assets for the Company's benefit and not for personal gain.
- 1.9 Conduct oneself appropriately as a representative of the organization in dealings with external parties.
- 1.10 Comply strictly with the Company's code of conduct and ethical guidelines, and avoid any actions that conflict with the Company's interests.
- 1.11 Be responsible for maintaining appropriate behavior of oneself and colleagues, and ensure that no form of harassment occurs, including verbal harassment, physical harassment, visual harassment, and in particular sexual harassment, such as unwelcome advances, solicitation of sexual favors, or physical or verbal sexual misconduct.
- 1.12 Refrain from engaging in or arranging any sexual activities to obtain business advantages or to advance one's position.



- 1.13 Monitor the conduct of colleagues at all levels and promptly report any suspected dishonest or improper behavior to supervisors or the internal audit function in accordance with Company regulations.
- 1.14 Exercise caution in using working hours for personal matters outside one's responsibilities to the Company, such as serving as a director of entities outside the Group during working hours, and report such matters to the compliance function and obtain prior approval from one's supervisor.

2. Customers and External Parties

- 2.1 Provide services to customers with the objective of achieving their best interests, based on honesty and integrity, with courtesy, attentiveness to customer feedback, a strong service mindset, and equal treatment of all customers.
- 2.2 Refrain from giving assurances or commitments to customers beyond one's authority.
- 2.3 Strictly maintain the confidentiality of customer and Company information, and do not misuse customer trust for personal or related-party benefits.
- 2.4 Refrain from disclosing customer information to third parties or using such information to compete with customers.
- 2.5 Refrain from requesting or accepting any property or benefits from customers or the Company's business partners, other than fees and charges imposed by the Company.
- 2.6 In the event of operational issues or customer-related problems, promptly report or consult with supervisors in accordance with the established reporting line.

3. Supervisors

- 3.1 Maintain a positive and respectful attitude toward supervisors.
- 3.2 Refrain from engaging in any actions outside the scope of assigned duties for the purpose of personal career advancement.

4. Colleagues

- 4.1 Treat colleagues with courtesy, sincerity, and teamwork, provide mutual support in appropriate ways that benefit the Company's work, and share work-related knowledge and experience with colleagues and subordinates as appropriate.
- 4.2 Refrain from disclosing or making disparaging remarks about colleagues' personal matters or information.

5. Society

- 5.1 Conduct oneself in accordance with accepted moral standards and good social customs.



- 5.2 Participate in social and community activities by providing appropriate cooperation and assistance, taking into account one's capacity and suitable opportunities.
- 5.3 Refrain from inappropriate or unethical behavior that may harm one's own image or the reputation of the organization, such as involvement in vices, illegal drugs, gambling of any kind, or excessive personal debt.
- 5.4 Refrain from cooperating with or supporting any activities that pose a threat to national security and/or are contrary to public morals.

6. Conflict of Interest

Avoid any actions that may create conflicts of interest with the Company, whether arising from dealings with related parties or from the use of opportunities or information obtained through one's employment for personal gain.

7. Gift Giving

- 7.1 The provision of gifts, hospitality, entertainment, or any other benefits to customers, business partners, or patrons for business purposes must be properly authorized by the designated authority, and such benefits must be appropriate, not contrary to cultural traditions or public morals, and not detrimental to the reputation of the organization.
- 7.2 The giving of gifts, hospitality, or other benefits in accordance with customary practices, festivals, or traditions may be permitted, provided that such actions are disclosed to and/or approved by supervisors as appropriate.
- 7.3 Refrain from giving gifts, hospitality, or any form of benefits to supervisors for the purpose of personal career advancement.

8. Gift Receiving

- 8.1 Do not solicit or accept bribes or any form of inducement in exchange for providing business benefits.
- 8.2 Avoid accepting gifts, assets, hospitality, or any benefits from customers, business partners, or related parties that may influence business decisions.
- 8.3 The acceptance of gifts, hospitality, or other benefits in accordance with customary practices, festivals, or traditions arising from business activities may be permitted in compliance with Company regulations, provided that such acceptance is reported to supervisors in all cases and that the gifts are collected and fairly allocated among all departments.
- 8.4 Refrain from accepting gifts, hospitality, or any form of benefits from subordinates that may influence decisions regarding promotion, advancement, or career development.