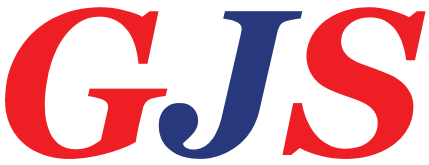

Code of Conduct

G J Steel Public Company Limited

VISION

"Being Thailand and ASEAN leading company in producing the highest standards of quality hot rolled steel achieved through the efficient manufacturing processes"

MISSION

- Provide the worldwide markets with wide range of steel products
- Grow with more production capacity and utilize it with minimal cost
- Improve and develop products to fulfill customers' requirements
- Continuously develop human resources
- Preserve the environment and contribute to society
- Enhance values to stakeholders
- Cooperate to Anti Corruption

MESSAGE FROM THE CHAIRMAN

Board of Director has a policy to promote corporate governance focused on running business under the Principles of Good Corporate Governance and Business Ethics, compliance with company rules, regulations and legal strictly. Honesty, transparency and responsibility to the social covered the needs of involved stakeholders in various sectors and consistent with the balance between business, social and environment which lead to a sustainable organization.

To express our commitment to fully develop the organization with transparency and lack of corruption either directly or indirectly, Board of Director declared to join the Thai Private Sector Anti-Corruption Program with a manual "Business Ethics and Code of Conduct For Executives and Employees " (“Manual of Business Ethics") to be a code of conduct in business practice on the fundamental of corporate governance responsible for both internal and external stakeholders with aim to be a sustainable business in the long run under the mutual awareness of common values between executives and all employees including society and environment. A review is required to follow up on the results of the manual continuously which encourages the organizations moving towards steadily and sustainable growth.

Therefore, Board of Director has approved this Manual of Business Ethics to use as a guideline on duty with strict adherence and believe that the policies and measures will strengthen and create a conscious mind to committees, executives and all employees to progress the company moving towards from now and forever.

Chairman of the Board

10 May 2018

IDEOLOGY AND VALUES

- **Personal**

Every one of us is a precious asset and is the foundation for organizational development. We shall treat our fellow employees with confidence and faith and the best human resource recruiting. Strengthen the organization from inside by promoting, developing and reward based on fairness and benefits of the organization.

- **Honesty**

Adherence to do the right thing. Perform duties with honesty and fairness under rules, regulations and related law Ethics is the basis of all decisions at every stage of operation.

- **Trust**

Trust each other is the basis for the highest performance. So we give confidence and trust to our colleagues as well as our partners and treat the person as we expect them to treat us.

- **Ownership**

Joint responsibility in improving our organization needs to be effective in all aspects, and taking into account the long-term success of the organization. Taking care of the company assets at the most valuable as well as protecting the reputation and benefits of business to remain forever.

- **Commitment to Success**

Intent to develop the organization towards success by dedicating full use of knowledge, join forces in every level and every field of work with the same destination to push the organization's operations to success according to the mission plan and goal in all aspects.

- **Committed to fighting corruption inside and outside the organization.**

Confidence to fight against all types of corruption both inside and outside the organization in order to operate the business with honesty, fairness, adherence to corporate social responsibility and all stakeholders. Strictly follow Good Corporate Governance Policy including Manual of Business Ethics and Code of Conduct to ensure that the committees, executives and all employees will act as good citizens of society and the nation.

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1. Definition

Ethics	means	Good business practice
Company	means	G J Steel Public Company Limited
Directors and sub-committees	means	The Board of Directors and sub-committees
Employees	means	The Company's executives,permanent Staff,temporary staff and contract staff
Related person	means	A person who is associated in any manner, the following (1) A person having the authority to control the Company's business and in the case of corporation shall include the directors of such juristic person. (2) A spouse, a minor child or adopted minor child of the director, the executiv or the person under (1) (3) A juristic person which the person under (1) or (2) has the authority to control is operation. (4) Any other persons as specified in the Notification of Capital Market Supervisory Boards.
Stakeholders	means	The shareholders, employees, customers, supplier / creditors, government, private sector, societies, communities and evironments.
Disclosure	means	The disclosure of information relating to business activties of the company under the Public Limited Company Act B.E.2535, the Securities and Exchange Act, B.E. 2551, the rules and regulations of the stock Exchange of Thailand and the Securities and Exchange Commission

Corruption	means	Refers to conducting, or abstaining from conducting one's duties, or exerting one's power improperly in any forms, whether giving or taking of bribes, offering or promising to offer a bribe, asking for, or demanding of assets, money, gifts, rights or other benefits opposed to morality and ethics, laws, rules, including regulations and policies, to government official or individuals involved in the Company's business, to the Company's subsiaries both in domestic and overseas, in which leads to the organization, employees or related parties to receiving benefits to which they are not entitled.
Confict of interest	menas	Any activity that may have personal preferences, or of the connected persons, whether by blood, or any other that have influence on decision making, or may be hindered, or impede the greatest benefits.
Offers of Things or any benefits	means	Granting privileges in the form of money, property, goods or other benefits. To be a reward, or to build good relationships
bribery	means	An offer / acceptance of gifts, rewards or any benefits for themselve or from people who want to convince them to do something illegal or dishonest business ethics.
Tradition	means	A festival, Menorial Day or a succeeded activity having unique and being important to society.
Donation	means	Money or property donations are not expected to result in business returns.
Charity donation	means	Refers to activities involving spending money without tangible return.

Public donation	means	Spending money for projects, activities benefit to communities, society, and people. The Company may not receive tangible returns.
State officials	means	As defined in the Anti-Corruption Law, including government officers, state employees, employees, agents or other persons who represent the following parties: (1) Ministries, Bureaucracy, Departments, or government units (eg. Customs Department, Immigration Bureau, etc.) (2) International organizations (eg. World Bank, IMF etc.) (3) Political parties, politicians, or candidate (both government and opposition). (4) Government authorities (eg. the Securities and Exchange Commission, Bank of Thailand, The Stock Exchange of Thailand, etc.) (5) State-owned enterprises or other companies, or organizations owned or controlled by a state or government agency.
Support Money	means	money paid for services or benefit which difficult to measure and track. This may be linked to bribery, i.e money paid for charity sports or non-profit organization, a hidden purpose as a facede to gain the advantage from government officials' consideration or related parties (for examples, competitive advantages include promising business, opportunities or auction, reduction or cancellation of fees, provide, help or cancel the requirements to have for licenses without

		normal decision-making process by the government, cancellation or reduction of legal requirement, provide or assist in accessing to government officials)
Political assistance	means	The provision of property, money, articles, rights or other benefits To help or support Or for any other purpose To political parties, politicians, or persons with political affiliations. As well as political activities. Either directly or indirectly

2. Business Ethics

1. Guidelines for the business

Board of Directors Has the guidelines and the intention to supervise the business by adhering to the principles of good corporate governance. In business to sustainability And maintain the interests of stakeholders and society. Opportunity for participants It is a mechanism and process that will take care of the operation. Effective, transparent and verifiable. As a result, the company has increased its competitiveness. And add value to the shareholders in the long run. The Board of Directors has set the guidelines. Lead to a corporate governance to truly as follows :

1.1 To comply with the applicable laws, rules and regulation strictly.

1.2 To comply with the Company's"Corporate Governance policy" and "Code of Conduct"

1.3 To be commit to business and management with honesty, transparency and fairness within the framework of the law. To achieve maximum benefits to the Company, employees and shareholders. Take care not conflicts in the interests

1.4 To taking into consideration the rights and treatment of shareholders equally and fairly to all parties.

1.5 To adhere to conduct as good people and establish good minds to employees.

1.6 To concern of the benefits and effects from operations with social equality and fairness to the Company's stakeholders

1.7 To operate business with responsibility and protection of the stakeholder's and public's interests.

1.8 To organize a strong operation system to prevent corruptions with an internal audit system.

1.9 To require the Company's directors, executive and staff for all to participate in the anti-corruption effort, conficts of interest reporting, effient contacts and working life quality promotions.

1.10 To provide a channel for complaints and hearing for stakeholders and have the complainers / informants protection measure.

2. Anti-Corruption Policy

The Board of Diredtor commitment to conduct business with integrity, faimess, and responsibility to society and stakeholders. The policy is strictly adhered to in the Corporate Governance, Code of Conduct.and Company Policy

To ensure director and employees practice is good citizens of the society and the nation. Board of Directors Anti-corruption policies to all events is as follows.

This anti-corruption policy is an extension Code of Conduct, and was approved by the Board of Directors on November 13, 2017

1. Objectives

1.1 To represent the Company's intention and commitment in opposition to any forms of corruptions, either directly or indirectly.

1.2 To define responsibilities, guidelines and regulation for all directors, executives, and all employees to be aware of and take action against and prevent corruption with all business activities strictly

1.3 To create confidence in customers, partners including business partners and other stakeholders.

2. Definitions

"Corruption" means bribery of any forms by ways of offering, promise to provide, provide, agree to provide, including request or accept of money, assets, services or other benefits that are inappropriate for government officer, government sector, private sector or any relevant persons in charge either directly or indirectly in order to do or refrain from duty of which deliver or preserve inappropriate business affair or other business benefit, including for benefit of himself, family, friends, unless otherwise provide by laws, rules and regulations, announcements, local culture or business practice.

3. Scopeof Implementation

3.1 The Anti-Corruption policy applies to all employees of the Company, in which covers all directors, executives, and employees.

3.2 The Company expects that customers, partners including business partners and other stakeholders who have business relationship with the Company shall comply with the Anti-Corruption policy.

4. Duties and Responsibilities

4.1 Board of Directors of the Company has duties and is responsible for the imposition of policies and to supervise the establishment of efficient anti-corruption systems. In addition, the Board has to ensure the management awareness and attention to the anti-corruption scheme, and embed the organizational anti-corruption culture.

4.2 Audit Committee has duties and is responsible for reviewing financial and accounting reports, internal control system, internal audit system, and risk management, in order to ensure that the anti-corruption process is adequate, appropriate and effective in accordance with international standards.

4.3 Risk Management Committee has duties and is responsible for assessing the corruption risk relevant to business activities, and for supervising the establishment of prevention measure or mitigation measures including the assessment.

4.4 Chairman of the Board of Directors, director, and managements, have duties and are responsible for establishing the encouragements and supports the anti-corruption policy, including the communication to employees and related parties. In addition, they are responsible for reviewing the appropriation of relevant systems and measures to be aligned with the changes in business practices, rules and regulations, including applicable laws.

4.5 Internal Audit Department has duties and is responsible for reviewing the operation whether it is aligned with policy, rules and regulations, including law and regulatory requirements, in order to ensure the control systems are appropriate, adequate and efficient in management of the corruption risk including reporting to the Audit Committee.

4.6 All employees have duties and responsibilities to strictly comply with policies and practices of anti-corruption.

5. Guidelines for Anti-Corruption policy

5.1 Directors, executives, and employees of the Company (including other companies in which the Company has control over its business partners, and persons who may be considered as intermediaries or agents of the company.) are not allowed to proceed with, provide, or support any kinds of corruptions, either directly or indirectly.

5.2 Any action described in the Anti-Corruption policy shall be aligned with the guidelines set out in the Code of Conduct, as well as policies and practice for the

Company's stakeholders, including rule, manual for related work, and other practices imposed in the future.

5.3 The Anti-Corruption policy covers all activities related to the Company's operations. The supervisors at all levels are assigned to communicate with employees for use in business activities that are in charge and to supervise the operation to be effective.

5.4 To establish anti-corruption risk assessment throughout the organization annualy.

5.5 For clarity in proceeding with the risks of corruption, all directors, executives and employees at all levels must treat with caution for the following matters.

Gifts, gifts, entertainment and expenses

Methods to grant or receive gifts, and entertainment shall be in line with guidelines described in Code of Conduct of the Company.

Donations for charity or sponsorship

Granting or receiving donations shall be transparent and legal. The donations shall not for use as an excuse for bribery. This is in line with guidelines described in Code of Conduct of the Company.

Business relations and procurement

It is prohibited to provide or accept bribes to conduct any types of business with partners, counterparties, government agencies or business units operating business with the Company. It must be done in a transparent, honest and in compliance with relevant laws.

Political Assistance Policy

The Company has implemented a neutral political policy, in which every staffs have political rights and freedoms by law. However, they must be aware that they shall not perform or carry out any political activities, or

exploit the resources of the Company or its subsidiaries in any political activities, which could cause the Company to lose its neutrality or sustain liability from such involvement or provision of political support.

3. Ethics of the Board of Directors

The Company intends for the board of directors, sub-committees and subsidiaries' directors to perform their dutie to operate with ethics, conduct or maintain their performance carefully, prudently and with ethics, conduct or maintain their performance carefully, prudently and with honesty, to optimize the continuous and sustainable business operation of the company and stakeholders, and follow :

1. Compliance with laws and th Company's regulation

1.1 Compliance with rules, regulations and laws involved with the Company's business shall be as follows :

(1) Directors executives ad staff shall comply with the laws, rules and regulations of the Stock Exchange of Thailand and the Securities and Exchange Commission.

(2) Directors, executives and staff shall not avoid compliance with the applicable orders, rules and laws.

(3) Directors, executives and staff shall co-operate with the company' corporate governance unit and report about violation against order, rule and laws the unit.

1.2 Duty performance shall be conducted with impartially i.e. in meetings when to discuss an issue the dierector who has conflict of interest shall leave the meeting room and shall refrain from participation in the issue decision

1.3 To avoid a conflict of interest for a business reveal and efficiency by :

(1) To prohibit use a secret of organization that illigal and to forbid other secret information of organization when you expire of business of the organization then.

(2) Do not acquire the personal interests from being directors.

(3) Do not develop a binding which may contradict with duty afterward.

(4) Do not create obligation that may conflict with their duties in the future.

(5) Do not receive anything or other benefit in conflict of the organization

1.4 Keep the confidentialily of corporate information, to prevent, that may cause damage to the organization or stakeholders, except in accordance with the law.

1.5 Acquisitions or disposition of assets of the dierectors, their spouses and minor child, should be practice in accordance with the Notification of the Board of Governors of SET title Practicres regarding the Acquisition or Disposition of Assets of the Directors and Staff B.E. 2547.

2. Conflict of interest and confidential information keeping

2.1 Confict of interest

The Company has the policy that the directors, executive and staff shall not use the oppurtunities from their status in the Company to acquire personal interests eventually imposes the practices as follow :

(1) They shall avoid a transacting having involvement with themselves which may cause the conflict of interest to the Company.

(2) Not to use inside information, which is important for investors to make investment decisions, whether it is information about the operation. Expansion Plans or other information. Used to buy or sell shares of the company. The information is not disclosed in the SET

(3) In case such transcting to needed for the Company's interest it shall be carried out as if a transacting with an outside having agreement in gerenral over a trading negotiation authority with no influence from being directors, executives or related persons and not participating in a consideration for apporval including having to comply the rules and regulations of the Stock Exchange of Thailand and the Securities and Exchange Commission on the transaction information disclosure.

(4) A director, executive or staff if becomes a director, partner or advisor in other organization; status shall not conflict the Company's interest and his / her direct role in the Company.

(5) A transaction which has or may have conflict of interest between shareholder, director executive or other person shall comply with the standard practice and be ensured it is fair, transparent, reasonable and fully and correctly disclosel and the company will arrange report form for disclosing suspected transactions that there will be conflict with interest of the company into the Corporate Governance handbook.

(6) Person who has conflicts with the Company's business, directly or indirectly howsover, shall report the interest as follows :

- Directors and executives – Shall report the interest immediately after it arises. To ensure that the company conducts regular checks; the Company's secretary shall check interest every year end and report to the Chairman and chairman of the audit and corporate governance committee chairman at least once a year.
- To correspond with the good corporate governance policy all managements and related staff shall report interest immediately after they arise and / or regularly report every year end. The Company secretary as the chairman of governance committee shall check and report to President regularly or at least once a year.

(7) A director, executive and staff who know the inside imformation shall comply with rules. The responsible directors and executives shall report the security holdings under the regulations of the Securities and Exchange Commission to the Board regularly

(8) The Company has announced the directors, executives and staff who know the inside information which may have effect to changes of the security exchange prices shall refrain from the Company Security Exchange one month prior the Company announces the financial statement or the inside information disclosure to public.

(9) To monitor interest of the directors, executives and involved persons who have interest with the Company and subsidiaries under the Securities Act, the Board of

Directors has detemined the rule that the related transaction shall be reported quarterly and under the other criteria imposed.

(10) In case and related person involves or hold shares in and enterprise competing with the Company which probably incurring conflict of interest with the Company should act as follows :

- The director, executive and related persons shall inform to the Board of Dierectors in writing.

2.2 The use of inside informantion

(1) Directors, executives and staff shall not use the opportunity or information obtained from their status to acquire personal interest for themselves, for other party or for operating a business competing with the Company and / or the Company's other business involved.

(2) The Company's inside information shall not be used for personal interest in the Company's security exchange or furnished to other people for buying or selling company shares.

(3) The Company's properties shall not be used for personal interests.

(4) The Company's information shall not be used as the outsider's reference for personal interests.

(5) The Company's business confidential information shall not be disclosed to outsiders particularly competitors even after the directors, executives or staff have expired from position.

3. Responsibility to the Company's properties

The Company promotes the executives and staff to use the Company's resources and properties effextivly to enhance competitiveness and good services to clients, by determining the following practices :

- The Company's assets and resources shall be used saving and most beneficially.
- Employess shall collaboratively take care the Company's assets are not to be depeciated / lost illegally.

3.1 Documentation

(1) Documentations shall be executed with honesty, prudence and compliance with the specified standard.

(2) The Company's letters, reports and documents shall not be falsified.

3.2 Computers & Information Technology System use

(1) Computers, IT systems and informations shall be deemed as the Company's properties Executives and staff should not use computers and it systems for personal purposes.

(2) Executives and staff shall not disclose the Company's business information including the information been purchased by company both existing and not existing in the Company's information system or copy the information to their personal devices without permission by commander.

(3) Executives and staff shall not modify, reproduce, erase or destroy the Company's information without permission.

(4) Executives and staff shall not bring unlicensed software to the Company to use and shall not copy licensed software for any reason whatsover without the software producer's consent.

(5) Executives and staff shall not modify the Company's hardware or put on an equipment other than the standard parts / equipment readily provided unless consented case by case

(6) Executives and staff shall not use the Company's email to forward message which harassing, discrediting, rude, obscene, intimidating, agitating or annoying to others.

(7) Executives and staff should use the internet to search for the information and knowledge useful to works and should avoid illegal or immoral websites.

(8) Executives and staff should use the Company's IT system and other communication equipment such as telephones, fac machine, mobile phones ets. with conscious mind and responsibility substantially realizing the Company's interest.

(9) Executives and staff shall not illegally to the systems or information not permitted or authorized to them.

(10) Executives and staff shall not spy the measure protecting data acesses and computer that other people prepare or that is not intended for executives and staff illegally and that is intended to use to cause damage to other people.

(11) The Company or assigned section reserves the right to check the use of properties and units under / assigned by the Company as to be appropriate.

4. Ethics to stakeholders

1. Best practice on the social responsibility

Board of Directors Recognizes the ability to grow steadily. And sustainability of the organization. Under Corporate Social Responsibility Policy Human Resources Development This is the main driving force. To meet the needs of stakeholders equitably. And can live together happily and sustainably in three aspects personal corporate and Social is committed to doing business in good faith. Fair and transparent. Anti-corruption Follow the law. And all relevant regulations. It also takes into account the benefits and impacts of the organization's operations on the stakeholders of the company. It also oversees the implementation of safety, health and environment. Not to affect all stakeholders. Along with social and local development to strengthen.

2. Policy regarding best practice on shareholders

The Company realizes the shareholders are the Company's owners and the Company's duty is to generate added value to shareholders in long term, therefore, the company determines that the directors executives and staff perform according to the following guidelines.

2.1 Perform duty with responsibility, carefulness and honesty under reasonable decisions on the ground that the information is sufficient and correct, they have no direct and indirect interest and perform with honesty for maximum interest to the Company, they perform over the right and suitable purposes and they shall not act over conflicts of interest to the Company.

2.2 Comply with laws, the Company's objectives and articles of association, directors resolutions shareholders meetings' resolutions, good practices in the accordance with

the corporate governance policy and code of conduct and act to shareholders equally both major and minor shareholders for their maximum interests.

2.3 Manage and take care of the Company's assets not to be depreciated / lost illegally and provide an effective internal control and risk management systems.

2.4 Provide opportunities to shareholders to participate in the Company's business care and render opinions on operations under the equal acts to them.

2.5 Report the Company's status regularly, completely, truly and in-time to situations.

2.6 Furnish the Company's data, news and information truly, sufficiently, equally and in-time to shareholders for their decision-making.

2.7 Take care for the directors, executives and staff not to acquire their and related peoples' interest by furnishing the Company's confidential information or disclosing the Company's secret to outsider and / or performing any acts which may lead to conflicts of interest to the Company.

2.8 Provide the channels for irregularty informing and complaints such as website, mailbox, telecommunications etc. with informing and complaint responses and complainant protection in cluding systematic and fair feedback reports to informants and complainers.

2.9 Provide several channels to disclose the information as well as make a company's website to allow the shareholders to access the information conveniently and prepare the information in the easy – to – understand language both in Thai and English.

3. Policy regarding best practice on employees

3.1 The Company has measures to protect employees providing information to the authorities in case there is legal offence or offence against the Securities and Exchange Act. Employee will be protectd. The Company will not act unfairly, either changing positions, job description, workplace, suspension of job, threat, annoying of their work, dismissing emplohyees (Section 89/2) as employees notify clues on illegal acts or unethical acts.

3.2 The Company realizes employees are the essential factor for product quality consequently shall fairly give importance to the acts to them which include providing

opportunity, watges, appointments, transfers and potential developments together with merits development of virtues for them to be the society's capable and good people. The Company's acts to employees shall be as follows :

(1) The Company shall comply with labor laws and rules relating to employees strictly.

(2) The Company shall act to employees with politeness, respect to individuality and people honors in accordance with the international human rights.

(3) The Company shall act to employees conditions which are fair to employees with the wages suitable to abilities

(4) The Company shall take care of the working environment and manage the working system for the employees'life and property safety and health.

(5) The Company shall give importance to the skill training and potential enhancement manpower development by providing to employees the learning opportunities widely and constantly.

(6) The Company shall have promotion, transfers, awarding and punishments to employees shincere by and based on the employee's knowledge, capability and appropriateness.

(7) The Company shall organize a provident fund for employees.

(8) The Company shall regularly furnish information on its operation and status to employee.

(9) The Company shall listen to the employees' opinions and suggestions based on their work skills and experiences.

(10) The Company shall avoid acts which are unfair, and which may have effect on stability of employees' positions or threaten / incur pressure to mind to employees.

(11) The Company shall develop employee's good conscious mind to be givers and good citizens of society.

(12) The Company shall provide channels for employees to file complaints in case they are treatded unfairly or inform offences against the law. The Company shall have systematic and fair rectification process and measures to protect the complainants.

(13) The Company and its delegate shall support employees to use their political rights with neutrality.

(14) The Company encourages the participation of employees in the suggestion and approach in performance and / or any agreement to the benefit of all parties and the relationship to work together with the good corporate culture together. As well as the unity within the organization.

(15) The Company encourages the employees to participate in activities both inside and outside, which is beneficial to enterprise and the society to create the paricipation and commitment to the organization. The appropriate and the discretion of the bosses.

4. Policy regarding best practice on clients

The Company has the policy to give importance to the clients' satisfactions fulfillment which is the factor to lead to business achievement and intends to acquire the clients' requirement more effetive fulfullment. To achieve, the policies and practices below shall be followed :

4.1 The products supplied to clients shall be of the qualities agreed with clients and at reasonale, non-profiteering prices.

4.2 Correct, sufficient and in-time information, news and advices shall be furnished to clients for them to be knowledgeable of the Company's products and services.

4.3 The teams and conditions with clients shall be complied with strictly. In case iti is not possible to do so, the Company shall report to client to collaborate jointly to solve the problem.

4.4 The acts to clients shall be polite and reliable.

4.5 A client's information storage system shall be availavle with a clients' confidential protection measure. A clients information shall not be furnished if not allowed by him as well as clients information shall not be used for an employee's or his / her related people's interest inappropriately.

4.6 Products shall be warranted for a reasonable period and compliantl with the consumers protection act.

4.7 A system / process for clients to complain on product's and service's qualities, quantities and safeties shall be provided together with the response fastness and acions to the end for immediate responses to clients.

4.8 The Company shall support the clients' acts for the social responsibility.

4.9 Focus on development to produce products using the packaging. Transport and environment friendly.

4.10 Create channal in providing information about the products and product development, customer know continously.

5. Policy regarding best practice on supplier and / or creditors

The Company has the policy to act to suppliers and creditors equitably and fairly over the regard to Company's interest maximization and based on fair returns to both sides avoiding the conflict of interest situation including complying with agreements, furnishing true information and valid reports and based on business relationship as follow :

5.1 The Company shall act ot clients equitably and fairly.

5.2 The Company shall use the licensed products, patent and trademark validity and services and shall not support the products / services which violate intellectual property right.

5.3 Executives and staff shall not offerthings or benefits in any forms to outsiders to convince for inappropriate acts / causing conflicts. This is in accordance with Section 2. Code of Conduct Clause 2. Anti-Corruption Policy

5.4 In case there arise information that there is an irregular interest request, acceptance or furnishing happened the detail shall be disclosed to the suppliers and the parties shall collaborate to solve the problem fairly and immediately together with acquire a preventive measure and equal opportunity in the selection process by considering the properties is critical.

5.5 The conditions agreed with the suppliers and / or creditors shall be somplied with strictly.

5.6 In case a condition cannot be complied with a prior notice shall be made to collaborate for problem solving.

5.7 Opportunities shall be provided to suppliers who operating business legally, complying with environmental / safety / health standards and having social responsibility.

5.8 The Company shall support the suppliers' operations on the social responsibility and provide opportunities for them to in the Company's activities for society.

6. Policy regarding best practice on business competitors

The Company has the policy to act to business competitors under the business competition practice code framework and shall not cheatinglh infringe / spy the business competitor's secrets as follows :

6.1 The Company shall conduct and practice within a good competition, free trade promotion and the Company shall not use the method of market plunging.

6.2 The company sahll no acquire the business competitors' secret information with a cheating / inappropriate means, such as bribes or hiring a competitor to obtain confientaial information of its competitions.

6.3 The Company shall not discredit the business competitors with allegations.

6.4 Not support the common practice to act or collusion in the bidding process was unfair to coustomers.

6.5 Compliance with the law and does not violate the intellectual propert very seriously.

7. Safety Health and Environment

The Company is committed to operate the business basis on safety, health and good environment under the guideline "business trust" to promote the company. There is a process that is friendly to the environment and staff with the practices as follows :

7.1 The Company shall comply with the safety, health and environment laws and rules.

7.2 The Company shall comply with ISO 14001.

7.3 The Company shall utilize resources efficiently and worthily swith energy saving and resources recycling promotion measures.

7.4 The Company shall provide an operation system focusing on oppropriate measures for safet and health in workplace such as providing the system to counter probable

pollutions arising during operation, arranging workplaces to be clean and hygienic ets. for the employees and visitors to be safe from accidents and diseases.

7.5 Executives and staff shall be truly attentive to the activities for the quality of safety, health and environment and perform works with realization to safety and concern to environment always.

7.6 The Company shall disclose the information on the operations in connection with safety, health and environment.

8. Communithy and Social Responsibility

The Company is committed to the community and society coexist happily with the theme. " Groeth Society" to help each other and contribute to the development of a strong communit on its own. The process works with a community focus. And promotional activities Communities near and far, according to company policy and consistent with the development of the sector. To improve the quality of life and economic sustainability of the community as follows :

8.1 The Company will operate the business to consider the benefits and sustainability of communities and society are important.

8.2 The Company shall regulary attend meetings exchange opinions and cooperate with local agenciesfor the communities'living developments.

8.3 The Company shall adopt the preventive and corrective measures when effects to environment and communities arise due to operation.

8.4 The Company shall launch the activities for society with the employees' participation including shall support employees' opportunities to do good to develop the mind of volunteering

8.5 The Company aims to develop the knowledge and education of young Thailand-based potential of the Company.

8.6 The Company shall cooperate with the local government to develop the entities for schools' religious places' infrastructures' and youths' and disdvantaged people's hygiene including the community environment developments.

8.7 The Company shall support the local cultures, customs and traditions conversation.

8.8 The Company shall support the activities to strengthen the local community enterprises and provide the opportunity to be the Company's suppliers.

8.9 Create revenue and promoting the community. By recruiting snd supporting employment and the community. As well as support activities that focus on providing the community with knowledge for the profession and the knowledge to create or encourage families and communities

8.10 The Company shall contact with communities constantly, publicize and report the social responsibility actiities achievement to all groups of stakeholders.

5. Employees' Ethics

The company focuses on the development of potential employees to become good citizens of the society to promote and develop human resources in a Individual Social Responsibility (ISR) on the staff at the center To promote employees that have both "good people and great potential" and can be extended to society and stakeholders of the business, the practices as follows:

1. Best practice on themselves

1.1 Employees shall carry out works with honesty, regularity and report the facts.

1.2 Employees shall respect and comply with laws and the Company's rules and regulations.

1.3 Employees shall carry out work with care, honesty and regularity and shall not employ their positions to acquire interest inappropriately.

2. Best Practice on clients, related peoples and society

2.1 Employees shall work with attention to detail to produce best quality products and deliver to clients on time.

2.2 Employees shall comply with safety rules.

2.3 Employees shall not disclose client's information without client's prior consent.

2.4 Employees shall participate in the activities with social impact provided by the Company.

2.5 Employees shall participate in the local cultures and traditions succeeding.

2.6 Channel to receive comments and feedback from customers in order to improve the operations of the Company.

3. Best Practice on colleagues

3.1 Employees shall not solicit or convince colleagues' decisions on political right.

3.2 Employees shall be benevolent to colleagues and shall cooperate with colleagues appropriately.

3.3 Employees shall use their rights to express opinions politely and properly.

4. Best practice on the company

4.1 Employees shall carry out work with responsibility and full capability.

4.2 Employees shall use the Company's assets, facilities and other benefits with care.

4.3 On witness misconduct, fraud, corruption or events that could cause damage to the organization. Employees shall report immediately through the complaints and feedback (Section 7 complaints and feedback) at the Company specified.

4.4 Employees shall be attentive for learning and development to progress.

4.5 Employees shall pursue information and news to use as reliable reference on their job.

4.6 Employees shall wear protective equipment as per the Company instructs.

5. Political right

Employees have right to participate or/and support any political's activities in personally after working hours and not using the Company's capital, resource to support political parties, politicians directly or indirectly howsoever.

6. Supervision in Acting and Reviewing

The Company has defined all the directors, executives and staff to shall have the duty and responsibility to acknowledge, make understanding and comply with the policies stipulated in this code

of conduct handbook strictly, non-compliance is voluntary, can not refuse on acknowledgement based on established guidelines.

Executives at all levels in the organization must be responsible and it is important to operate under the supervision of their employees to understand and follow the code of conduct seriously.

The company does not wish to make any action that is illegal, contrary to the principles of good directors and employees who breach ethical requirements, disciplinary action will be strictly and if it is done, to believe that the laws, rules and regulations of government, the company will submit the matter to government officials to proceed immediately.

The code of conduct handbook shall be reviewed annually by the Board of Directors and the Audit and Corporate Governance committee.

7. Complaints and Give Suggestions

The Board of Directors had provided the opportunities for employees and stakeholders, having a channel for complaints and reporting illegal acts. The company secretary is acknowage as the complaints of corporate governance and business ethics of the company are as follows:

1. Compliants and Suggestions channels

The company had provided channel for complaints and reporting as below

- **Internal Complaint**

Channel 1

Internal Audit Department
Call. 02-267-8222 # 5610,5611
e-mail : IA@gjsteel.co.th **or** Send mail to :
Internal Audit Department
G J Steel Public Company Limited
88 PASO Tower, 24 th Floor, Silom Road, Suriyawong,
Bangrak, Bangkok 10500

Channel 2

Human Resourse and Administration Department
Call. 038-345-950 # 1320
e-mail : HRA@gjsteel.co.th **or** Send mail to :
Corruption Reporting Box at the front of Factory's entrance
and the front entrance door of Head-Office.

- **External Complaint**

Compliance Department
G J Steel Public Company Limited
88 PASO Tower, 24th Floor, Silom Road, Suriyawong,
Bangrak, Bangkok 10500
Tel. 02-267-8222 ext. 5151, 1559
e-mail : compliance@gjsteel.co.th

2. Upon receipt of the compliant process

The channels are for employees to file complaints and suggestions freely to lead to the Company developments and sustenance as follows:

2.1 The complaints receiver compiles the information on the offence / ethics incompliance.

2.2 The complaint receiver then reports the information to the committee who are responsible for the investigation. The submitted information will be considered for individual areas such as management, knowledge development, fact inspection etc.

2.3 Complaints shall be forwarded to the committee for investigation and lodging actions to suppress the offences / incompliance.

2.4 The investigation result shall be informed to The Company Secretary and The Company Secretary is responsible for summarizing the report to the Board of Directors.

2.5 If the complianant discloses himself / herself. The Company Secretary shall be reported the investigation result to the complianant.

3. Penalty

- **Directors, executives and employees**

The committee of investigate report the proved case. The company shall make an punishment to the employees following by type of case according to the Company's rules and regulations of Human Resource Management.

- **External Stakeholder**

The company will report the information to the committee for investigation then should submit the matter to the government officials to proceed following by laws.

4. Measure to protect the complainant

(1) A complainant can select to undisclosed himself / herself if the complaint may introduce unsafely. However if discloses the process progress report and clarification can be made to him / her.

(2) Complaints shall be kept confidential / safety – concerned. The Company has set the measure to protect the complainers and / or informants and / or the peoples who cooperate to investigations against unfair acts such as position, job and workplace change, intimidation, working annoyance, dismissal etc. due to complaints.

8. Discipline

The Company regards code of conduct shall be a discipline that the directors, executives and staff shall comply with. Offences or incompliance shall be deemed disciplinary offences in accordance to the Company's rules and regulations of Human Resource Management.

All directors, executives and staff shall comply with and support other peoples to comply with code of conduct. The following action below shall be deemed the disciplinary offences,

1. Not performing complying with the code of conduct handbook.

2. Suggestions, supports or encouragements to other peoples to not comply with the code of conduct.
3. Neglecting, ignorance when seeing any conduct that violates or that is not corresponding to ethics, in case such people knows about such conduct.
4. Being uncooperative or obstructive to the investigations.
5. An unfair act to complainant.