Business Ethics and Code of Conduct

Purpose

Dacon AS conducts its business abiding on good Business Ethics and codes of conducts, transparency management, trust, fairly treat with all Management, Staff Members and All involved persons, good monitoring system and aware of surrounding society.
To be criteria in concrete business operation, the Company appropriately defines the Business Ethics and code of conducts in writing adhering to every law, enforced regulations, rules, any methods that concerned by applied to exercise with the company principles.
This Business Ethics and Code of Conducts Manual has been created to be guidelines and good practices for the top executives through all employees strictly follow as a standard, to further constant improvement in business.

Definitions

Business Ethics are the qualities of virtue, truth, justice, and righteousness that business conduct should follow.
Code of Conduct is a code of behavior to be followed to maintain and promote dignity and reputation.

Our Principles We are committed to:

• Honesty

Company executives should be truthful to people involved. They should not intentionally mislead or deceive others by distorting information, exaggerating, or giving partial truth. Nor should they discriminate against people by doing or abstaining from doing something required to be done.

• Integrity

Company executives should exhibit their personal integrity and courage to uphold their convictions by doing things they perceive as right despite pressures favoring the opposite. They should be respectable, impartial, independence and committed to their principles. They should fight for their beliefs and never compromise their principles for any objective that would turn them into deceivers or immoral persons.

• Trust worthiness

Executives should disclose and provide related information, as well as correct any misunderstanding on facts. They should try in every proper way to fulfill their promises. They should not abuse technical or legal interpretation as an excuse not to cooperate or comply with contractual obligations.

• **Loyalty**
Our executives should exhibit their loyalty to the company by dedicating themselves to their respective duties and to its people by providing support and assistance whenever required. They should not use or disclose confidential information for personal advantage. On the contrary, they should maintain the ability to make decisions independently as professionals, avoiding inappropriate conduct and conflict of interest, as well as being faithful to the company and their colleagues. If the executives intend to leave and work somewhere else, they should notify appropriately in advance and treat the company information as important and confidential. They should not exploit their former positions for their own benefit.

• **Fairness**
All executives should be fair and just towards all people. They should not use their power deliberately, neither should they resort to cheating or inappropriate tactics to obtain or maintain benefits or advantages from misled or distressed people. Fair minded executives should disclose the agreements set for consideration and treat everyone equally, be open to disagreeable opinions, willing to admit the mistakes they make, and ready to shift positions and beliefs to appropriate and correct ones if the situation demands.

• **Concern for others**
Our executives should be considerate, sympathetic, kind, and well intentioned to others. As the golden rule says, "Treat others the way you want to be treated", executives should provide the help that people need. They should also pursue proper means to achieving business objectives in a way that the business objectives are aligned with the objectives and interests of people.

• **Respect for International Human Rights Principles**
Company executives should mutually respect each other's honor, freedom, privacy, legal and human rights, as well as the interests of stakeholders. In making their decisions, executives should be gentle and treat everyone as equal without discrimination by gender, class, or race.
The Company requires that all of its directors, the management and staff strictly respect International human rights principles as part of the operations and the Company does not tolerate any violations thereof.

• **Commitment to Excellence**
Executives should excel in their performance, i.e., should be equipped with knowledge, be prepared, and should work hard to enhance knowledge and skills to cope with every issue under one's responsibilities.

• **Leadership**
All executives should be aware of their own responsibilities and leadership requirements and should seek and comply with code of conduct models that would benefit themselves and the organization when put to work. They should also attempt to create an environment in which principles and ethical decision-making are given utmost importance.

• **Reputation and Morale**
Senior executives should create and defend company's reputation, as well as employees' morale, by singly and collectively avoiding any action that would hurt the inter-relation between the company and employees. On the other hand, all employees must singly and collectively do everything necessary to correct and prevent any wrongdoing committed by others.

• **Accountability**
Executives should be aware of, and accountable in following ethics when making any decision and omission for the company, themselves, their colleagues, and the community.

Vision
Dacon AS, to be the most service orientated and quality focused supplier and manufacturer in our field of business and expertise.

Mission and Core values
Mission is to provide our customers with reliable information and accurate knowledge about their asset's integrity and condition through quality inspections to international standards.
Core values are based on knowledge, experience and quality ensuring that we are trusted to provide the most suitable and effective solutions for our customers and enabling them to make the best decisions for their owners, employees, environment and assets.

Business Ethics
1. Policy on Compliance with the Law and Relevant Rules and Regulations
The Company is committed to complying with all relevant laws, rules and regulations everywhere it operates and has established the policies as follows:
• All managements and staffs must comply with local laws, rules, regulations as well as customs and traditions of the country in which the Company operates.
• All managements and staffs must comply with the Company's rules and regulations.
• All managements and staffs must not assist, support, or conspire to avoid any legal or regulatory compliance.
• All managements and staffs must cooperate with supervisory agencies as well as report information on violation of or non-compliance with existing laws or regulations to concerned persons.

2. Policy on Conflict of Interests
The Company has set up an important policy concerning the conflict of interests and related transactions for all managements and staffs as lay down under the following guidelines:
• Avoid any transaction related to oneself, which may lead to a conflict of interest with the Company.
• If it is necessary to carry out such transaction for the Company's benefit, conduct it as if it is a transaction done with a third party. However, any such transaction must be fully disclosed and approved by the relevant authority within the Company in advance. Furthermore, all managements and staffs having an interest in a transaction must not be involved in its approval process.
• If management and staff become a director, partner, advisor, or participant in any other capacity in another company or business organization, such position must not conflict with the Company's business or that person's direct responsibilities in the Company.

3. Policy on Confidentiality of Information
The Company has set up an important policy concerning the use of information of the Company in compliance with Good Corporate Governance and relevant regulations. The Company has advised the all managements and staffs to focus on confidential information especially internal information not yet disclosed to public or any data or information that may affect the business of the Company. The guidelines are as follows:
• All managements and staffs must not use information they receive from their directorships or employment for personal benefit or for conducting business or other activities in competition with the Company.
• All managements and staffs must not disclose business secrets to any third party especially to competitors even after All managements and staffs member has left the Company.

4. Policy on safeguarding Company Property

The Company expects executives and staff to utilize the Company's resources and assets in a most efficient manner, to increase corporate competitiveness and to provide the best possible service to its customers in accordance with the following guidelines:

4.1 Protection of the Company's properties and assets

• All managements and staffs should use the Company's resources and assets in a cost-efficient manner for maximum benefit of the Company.
• All managements and staffs should help protect the Company's properties and assets from improper depreciation or loss.
• Provide and follow proper preventive systems and procedures and effectively insure the same against any fire, natural calamities, burglary and other risk or damage.

4.2 Documentation

• All managements and staffs are to prepare documents with honesty and prudence while meeting stipulated standards.
• All managements and staffs are prohibited from falsifying the Company's letters, reports or documents.

4.3 Use of Computer and Information Technology

• All computer, information technology and information and data relating to its operation are the property of the Company. Managements and staffs should not use the Company's computers and information technology for personal interests.
• All managements and staffs are prohibited from disclosure to others of their password for access to the Company's information system.
• All managements and staffs are prohibited from disclosure of any information or data in the Company's information system to other parties without proper authorization.
• All managements and staffs are prohibited from changing, copying, deleting or destroying the Company's information or data without proper authorization.
• All managements and staffs are prohibited from using illegal software for any reason and from using copyright protected software without the permission of the copyright owner.
• All managements and staffs are prohibited from using the Company's electronic mail system to transmit derogatory, offensive, pornographic, abusive or annoying messages.
• All managements and staffs may only use the internet to seek information and knowledge related to their work and shall not access illegal or immoral websites.
• Staff should use all communication equipment such as telephones, facsimile machines and mobile phones provided by the Company, with appropriate sense of responsibility and care, taking the Company's interests into consideration.

5. Ethics for Intellectual Properties Rights

The Company requires that all of its directors, the management and staff respect the intellectual property rights of others with care and caution.

6. Policy on preventing corruption and offering a bribe

The Company has a policy prohibiting all form of bribery or corruption, either directly or indirectly to advance its business interests or those of its associates. The Company has a zero-tolerance policy for fraudulent and/or corrupt behavior and takes corruption and bribery transactions if any, very seriously. Any violation of this policy is regarded as a serious matter by the Company and will result in disciplinary action, including termination, consistent with local law.

The Company has established channels for reporting any misconduct, fraudulent act or corruption and provides protection and remedies for any person who files a complaint or cooperates in the investigation of the charge.

7. Policy on Giving and Receiving Gifts and Gratuities

The Company has guidelines on the giving and receiving of benefits that could improperly influence decision making that stipulate that they should be conducted correctly, honestly, and in ways that are certain not to cause condemnation or loss of reputation. Gifts received by Managements are generally retained within the Company or distributed among office staff. The following Company Guidelines concerning the giving and receiving gifts and gratuities should be followed:

• All managements and staffs are prohibited from demanding or receiving any benefit from trading parties or other external parties with whom the Company is doing business.

• All managements and staffs are strictly prohibited from offering any benefit to any trading parties or other external parties in any attempt to persuade them to commit a fraudulent action.

• All managements and staffs should refrain from giving/receiving gifts or gratuities from any trading parties or other external parties with whom the Company is doing business. Gifts given or received during festive occasions are excluded from this requirement provided that they have an appropriate value (not exceeding THB 2,000 per person in aggregate) and are not related to any business commitment.

8. Procurement

Procurement is to be conducted according to the company's procedures and should be fair to all involved. The procurement decisions are to be made on the basis of reasonable prices, quality, and service, and should stand scrutiny if an investigation occurs.

The following Company Guidelines concerning the procurement should be followed:

• Strictly follow the process set forth in the procurement and purchasing regulations, and act within the scope of authority provided.

• Avoid involvement in purchasing from contractors to whom you are connected, such as family members, relatives, or entities in which you have ownership.

• The priority in procurement should be given to legal entities rather than individual persons, except in cases where special expertise is required from the particular individuals or where the benefit of the Company demands it.

• Avoid using the information you obtain from procurement activities for benefit of yourself or others.

9. Transactions with the Government

Transactions with the Government must not be such as to persuade the government or government officials to do anything wrong or inappropriate. Mutual acknowledgement and building relations, within the proper bounds and normal practices, such as offering congratulatory messages and flowers on public occasions is acceptable.

The following Company Guidelines concerning the transactions with the Government should be followed:

• Conduct yourself properly and honestly when in contact with government officials or agencies.

• Always remember that the laws, rules, and customs of each place may have diverse conditions, procedures, or methods of proceeding.

• Comply with the laws of each country and/or of locality in matters pertaining to hiring government employees as consultants or employees of the Company. Such hiring must be transparent and appropriate.

Code of Conduct

1. Code of Conduct for Management

• Perform duties with honesty, transparency, and fairness to ensure that the decisions and actions are made to the extent possible, in the best interests of all the involved persons as a whole;
• Perform duties as professionals with knowledge, skill, determination, and prudence, watchful of trouble in advance; and seeking remedies for anticipated problems; and maintaining the code of conduct, including applying knowledge and skills to managing the company to the best of their abilities;
• Do not seek to benefit one-self or related persons by abusing undisclosed or confidential information inside the company or disclose to outsiders, or do anything that can be construed as a conflict of interest;
• Provide regular supervision and inspection, both inside the company and its environment to ensure compliance to set policies and processes;
• Provide for a system of accurate, complete, timely, and consistent information reporting, as well as reporting on future trends of the company, based on probability and supported by adequate data;
• Comply with concerned laws and regulations, be observant, aware up to date on services standards and set guidelines, maintaining adequate and appropriate documents for control and maintenance operations according to guidelines applicable to every level of management to ensure efficient business operations;
• Develop the business of the company to achieve objectives and standards;
• Promote company knowledge and understanding.

2. Code of Conduct for Staff

• Perform all duties honestly, carefully and for the benefit of the Company.
• Comply with relevant laws, rules, and regulations and follow good ethics while doing business and otherwise.
• Ensure confidentiality of all inside information and do not leak any inside information outside the Company and act at all times without deriving any personal benefit from such inside information not yet disclosed to the Public.
• Maintain harmony among all co-workers and staff in the Company.

3. Policy and Practice towards Involved Person

The Company recognizes the rights of all involved persons and therefore encourages cooperation between the Company and all the involved persons including employees, customers, trading partners, creditors, government agencies, community, and society at large. Directors, Managements, and staffs must comply with the Code of Conduct which has been established to ensure fair and balanced dealings with all involved persons.
The following practices may be adopted as guidelines in terms of dealing with all involved persons:

Customer

The Company must always act to protect customers' interests, be attentive and ultimately responsible to customers with regard to service, by setting and maintaining good standards.
They should keep customers' confidential information exclusively for concerned business use, without revealing it unless required by laws, regulations, or with the consent of the information owners, including issues related to marketing, market power exercises, price setting, and details of services, quality and safety.

Trading Partner and/or Creditor
The Company has a policy of equitable and fair treatment of its trading partners and/or creditors, taking into consideration the Company's interest and on the basis of mutual benefit and it intends to avoid circumstances that may lead to a conflict of interest. The Company ensures that best practices are set for procurement from suppliers, and that the Company complies with trade terms and terms of borrowing from financial creditors, objectives of using borrowed funds, repayment, collateral, and other terms and conditions. In case the Company cannot comply with any conditions of a Contract, the Company shall inform the trading partners and/or suppliers immediately to consider the ways to resolve the matter.

The following Company Guidelines for selection of suppliers shall be followed:
• Suppliers shall be selected based on their ability to service the needs of the Company in the most economical, efficient manner and consideration of their expertise, financial status and they will have strictly complied with laws and related regulations.
• Past performance of suppliers and cooperation with the Company should be important factors in supplier selection.
• Whenever the supplier base is not sufficient to fulfill the Company's needs, additional research and solicitation must be conducted by the Purchasing Department to increase vendor participation.

Competitor
The Company must act within the rules of fair trade, not destroying trade competitors' reputations with false allegations against them without truth, nor should they access competitors' confidential information using dishonest or inappropriate means.

Employee
The Company must provide equal opportunities in employment, job security, and career advancement, as well as follow equitable principles related to employees and employment.
Also ensure that employees are adequately knowledgeable and skillful in performing company business, and understand relevant code of conduct and good practices and take action for knowledge enhancement and ability improvement leading to their development in keeping with the trends in the industry.

Community and Society
The Company has to be responsible to the community and society and should be involved in supporting community activities and be attentive to the consequences of the company's conduct that affects people around, beyond the requirements of law, and should make full efforts to gradually absorb social accountability.
The Company is expected to conduct business that will benefit the economy and society while safeguarding customs and traditions of communities in countries where it operates in. It is also the Company's policy to become a responsible corporate citizen to comply with all relevant laws, rules, and regulations and to contribute to uplift quality of life by itself and/or through close collaboration with the relevant authorities and the communities.

4. Policy on Quality Management System

Recognizing of the customer satisfaction is the most important; hence the Company has brought ISO 9001standard using in its company. Moreover, the Company has also conducted the quality policy as;

1. Providing services and response to the customer's requirements with the highest achievable level of quality through the competence of staff and new technology for reaching the customer's requirement and getting the highest satisfaction.
2. Committing to continual improvement of all procedures in line with the quality and safety management system.
3. Adopting the process and system approach of management to be the principle in quality management so that the organization can make response to the customer's requirement effectively.
4. Strengthen the leadership, emphasize the involvement of staff, factual approach to decision making and establish the quality learning for developing the personnel effectively to make the highest effectiveness of operations.
5. Strengthen the mutually beneficial supplier relationship which will bring the highest quality product and services to the customer.
6. Maintaining a commitment to transparency, morality, and ethical business compliance.

5. Policy on Safety, Occupational Health, and Environment

The Company is committed to conducting business with the highest standards of safety, occupational health and environmental conditions in accordance with the following general guidelines:

1. Occupational Health, Safety and Environment job is everyone's responsibility in that every employee is responsible for working safely with oneself, colleague and any other party and including to property of company and clients.
2. All Employees must comply with this policy, to keep and carry out its responsibilities for all occupational health, safety and environmental matters and with clients HSE guidelines.
3. Company will comply with all regulations and other requirements relevant to Occupational Health, Safety and Environment.
4. Company is intent to protect everyone from injury and ill health and to protect against hazards of all job activities, for safety of all employees and all who may be concerned.
5. Company will promote and support the Occupational Health, Safety and Environmental job awareness to all employees, so that knowledge, competence, and awareness of safety are well known to all.
6. Company will provide all necessary recourses required with Occupational Health, Safety and Environment for the safe and effective performance of all company tasks.
7. Company will regularly review the Occupational Health, Safety and Environment policy to ensure that is still appropriate with its operation.

6. Enforcement of this Manual

The Company has clearly announced that it is the duty and responsibility of all managements and staffs to faithfully follow the Business Ethics and comply with the policies and practices stated in this Code of Conduct. All superiors must lead in compliance with this code and should be responsible for and consider it a priority to ensure that their subordinates truly learn, understand, and comply with this Policy and Code of Conduct.

7. Monitoring and Evaluation Process of Code of Conduct

The Company will monitor and evaluate oneself in compliance with this code of conduct by management and employees based on the results of the annual employee assessment.
The Company has a Complaint handling procedure as follows:

Procedure

• Upon receiving a complaint,
the designated person, will review and consult the top Management to assign the concerned committee. All relevant committee will decide whether an investigation is appropriate and, if so, what form it should take. They will decide to take no further action if a complaint appears to be trivial or malicious or due to vested interests of the Complainant.
• Some concerns may be resolved by agreed action without the need for investigation and the necessary employees will be involved in those discussions.
• If an investigation is required, all relevant committee above may designate an appropriate person(s) to investigate the matter.
• The designated person(s) shall address the complaints considering the seriousness of the issue raised and credibility of the concern and may, in their discretion, consult the Audit & Corporate Governance Committee, any Senior Management, engage outside auditors and/or legal experts who may have appropriate expertise to assist in the investigation and analysis of the results thereof.
• The designated person(s) should investigate the matter within a reasonable time frame. Investigations shall be made with the utmost respect in accordance with all relevant laws and regulations.
• The designated person(s) may decide how to report the progress/results of the investigation or the complaint to the complainant if his/her name is revealed. Confidentiality The Company recognizes that some individuals who observe a Breach and wish to report it will seek to do so in confidence under this Policy. In principle, the Company will handle all reports confidentially and equally expects employees reporting a Breach keeping this confidential. Confidentiality will always be maintained to the largest extent possible. Therefore, the Company will protect the identity of an employee who discloses a Breach according to this Policy.
The Company does however acknowledge that in some circumstances the investigation process may reach a point where the employee who reported the Breach is required to make a statement or provide evidence. In such circumstances, where finding the truth would be hindered by maintaining complete confidentiality, the Company cannot guarantee complete confidentiality to the reporting employee. The Company will maintain confidentiality as much as possible in such situations. Finally, the Company will not disclose employees' identity without his/her knowledge and consent.

No Retaliation

No member of the Board, Executive or Staff who in good faith reports a violation of the Code of Conduct or reports a complaint or concern involving matters covered by this Whistleblowing Policy shall suffer harassment, retaliation, or adverse employment consequence as a result of such a report. An employee who retaliates against someone who has reported a violation, complaint or concern in good faith is subject to discipline up to and including termination of employment.
This Whistleblowing Policy is intended to encourage and enable Directors, Executive and Staff and others to raise concerns within the Company and to better enable the Company to promote compliance with the Business Ethics and Code of Conduct and related policies. In the event that an employee files a complaint which such employee knows or reasonably should know to be false, such employee will be subject to disciplinary action such as termination of employment, and such employee may be held liable for damages incurred by the Company.