

## **Code of Business Conduct**

Index Living Mall Public Company Limited and its subsidiaries ("the Company") are committed to promoting integrity, transparency, and good corporate governance. This commitment aims to achieve corporate governance excellence and ensure continuous and sustainable growth, thereby delivering the utmost benefits to all stakeholders fairly.

The Board of Directors has established a Code of Business Conduct to be strictly adhered to by all directors, executives, and employees at every level.


Announcement on 26 April 2024

*-Pennapha Dhanasarnsilp-*

(Pennapha Dhanasarnsilp)


Chairman of the Board of Directors

Index Living Mall Public Company Limited

  <b>HUMAN RESOURCES</b>	<b>Operating Policy</b> <b>Index Living Mall Public Company Limited</b>		
	<b>TITLE:</b> General		<b>CONFIDENTIAL:</b> 00
	<b>TOPIC:</b> Code of Business Conduct		<b>DOCUMENT CODE:</b> ILM-HR-001
	<b>EFFECTIVE DATE:</b> April 26, 2024		<b>REVISION:</b> 06 <b>PAGE:</b> 1 / 24


Verification and Approval

Signatory	Signature	Position	Date
Prepared by	(Duangkamol Krobmuk)	SDH - QSHE	April 26,2024
Verified by	(Arporn Kadlungka)	Assistant Director - HRM	April 26,2024
	(Nattawarintorn Mahasirirujipas)	VP - HR	April 26,2024
Approved by	(Kritchankok Pattamayasondhi)	MD	April 26, 2024

  <b>HUMAN RESOURCES</b>	<b>Operating Policy</b> <b>Index Living Mall Public Company Limited</b>		
	<b>TITLE:</b> General	<b>CONFIDENTIAL:</b> 00	
	<b>TOPIC:</b> Code of Business Conduct	<b>DOCUMENT CODE:</b> ILM-HR-001	
	<b>EFFECTIVE DATE:</b> April 26, 2024	<b>REVISION:</b> 06	<b>PAGE:</b> 2 / 24

#### Document History

Revision	Revised Topics and Changes	Effective Date
00	Completed document	April 1, 2014
01	Revised/added Section 4.1 Code of Business Conduct <ul style="list-style-type: none"> <li>- Treatment of stakeholders</li> <li>- Disclosure of company information</li> <li>- Refraining from political engagement</li> <li>- Anti-corruption</li> <li>- Whistleblower protection: protect and treat whistleblowers or anyone who reports corruption or violations on regulations or the Company's Articles of Association with fairness</li> </ul>	May 1, 2016
02	<ul style="list-style-type: none"> <li>- The document with the code "ILM-HR-01-001 has been changed to "ILM-HR-001.</li> <li>- The scope and definitions were revised</li> <li>- The word "production" was added in Section 4.2</li> </ul>	December 16, 2016
03	The company name "Index Living Mall Company Limited" was changed to Index Living Mall Public Company Limited	June 11, 2018
04	Section 7, Treatment to Society, Community, and Environment, and sub-clauses (7)-(8) regarding land use and changes in land use was modified	November 1, 2019
05	1) Modified sub-clause 2 under Clause 4.1.5, Whistleblowing Channels for outsiders <ul style="list-style-type: none"> <li>- Verbal complaints can be reported via a direct line at 1379. Available daily from 9:00 a.m. - 6:00 p.m. The phone number +662 417-1111 was cancelled</li> </ul>	


  <b>HUMAN RESOURCES</b>	<b>Operating Policy</b> <b>Index Living Mall Public Company Limited</b>		
	<b>TITLE: General</b>		<b>CONFIDENTIAL: 00</b>
	<b>TOPIC: Code of Business Conduct</b>		<b>DOCUMENT CODE: ILM-HR-001</b>
	<b>EFFECTIVE DATE: April 26, 2024</b>		<b>REVISION: 06</b>
<b>PAGE: 3 / 24</b>			

Revision	Revised Topics and Changes	Effective Date
	<p>- Written complaints can be reported via email at <a href="mailto:customerservice_online@indexlivingmall.com">customerservice_online@indexlivingmall.com</a> or <a href="mailto:ethics_hotline@indexlivingmall.com">ethics_hotline@indexlivingmall.com</a>.</p> <p>The email address <a href="mailto:customer_service@indexlivingmall.com">customer_service@indexlivingmall.com</a> is no longer active.</p> <p>2) Added sub-clause 4, under Section 4.2.5 Conflict of Interest: Company Policy to Prevent Conflicts of Interest</p> <p>Added sub-clause 3: In the event that employees or family members or close persons of employees intend to use retail space services, whether using or exchanging the space, or any services that have a vested interest in the retail space business and/or any service businesses of the company group</p>	
06	<p>- Modified the word "Work Ethics" to "Code of Business Conduct"</p> <p>- Added Code of Business Conduct for the topics of Whistleblowing, Non-Discrimination, Maintaining Confidentiality, Combating Unfair Competition, Prevention of Insider Information from Personal Benefits, Safety, Occupational Health and Working Environment, and Data Security and Information Technology Security</p>	April 26, 2024

Document Distribution Record)

☒ All Departments   ☐ Specific Department/Issued Department   ☐ Relevant Department Please Specify.....

Copy	Department

  <b>HUMAN RESOURCES</b>	<b>Operating Policy</b> <b>Index Living Mall Public Company Limited</b>		
	<b>TITLE:</b> General		<b>CONFIDENTIAL:</b> 00
	<b>TOPIC:</b> Code of Business Conduct		<b>DOCUMENT CODE:</b> ILM-HR-001
	<b>EFFECTIVE DATE:</b> April 26, 2024		<b>REVISION:</b> 06 <b>PAGE:</b> 4 / 24

## 1. Scope

1.1 Covers all stakeholders and types of employees within the Index company group including persons acting on behalf of Index Living Mall Public Company Limited.

1.2 This applies to all departments of Index Company Living Mall Public Company Limited, including the headquarters, branches, furniture centers, distribution centers, The Walk, and branch offices (current and future).

## 2. Objective

2.1 Establish a code of business conduct of the Company so that all employees may behave, conduct themselves properly, and treat one another well, as well as treat third parties in the same manner.

2.2 To prevent actions that violate the law, ethics, culture, and customs, and also have consistent values.

2.3 To ensure that all employees and stakeholders adhere to the rules, regulations, and various guidelines based on laws, ethics, culture, customs, and corporate values. The Company seeks the participation of all individuals in this matter to cultivate a good culture on the basis of mutual satisfaction and stability.

2.4 To ensure that employees understand and comply with the code of business conduct.


## 3. Definition

3.1 Company Group refers to Index Living Mall Public Company Limited and its subsidiaries.

3.2 Company refers to Index Living Mall Public Company Limited, including the authorized signatory or assigned person who acts on behalf of the Company.

3.3 Subsidiary refers to a company that Index Living Mall Public Company Limited holds more than 50% shares.

3.4 Human resource department refers to employees who perform duties in human resource management and development.

  <b>HUMAN RESOURCES</b>	<b>Operating Policy</b> <b>Index Living Mall Public Company Limited</b>		
	<b>TITLE:</b> General		<b>CONFIDENTIAL:</b> 00
	<b>TOPIC:</b> Code of Business Conduct		<b>DOCUMENT CODE:</b> ILM-HR-001
	<b>EFFECTIVE DATE:</b> April 26, 2024		<b>REVISION:</b> 06 <b>PAGE:</b> 5 / 24

3.5 Department refers to all departments that are under the organizational structure of Index Living Mall Public Company Limited in which the employee works.

3.6 Supervisor refers to the employee's direct line of command or the acting person whose position is equivalent to or higher than the executive level.

3.7 Code of conduct refers to best practices for the Company's business operations and behavioral guidelines for employees.

3.8 Stakeholders refer to those involved or affected by the Company's business operations or activities, such as shareholders, employees, customers, partners, co-investors, creditors, society, communities, and the environment, but not limited to the government or government sector, business competitors, etc.

3.9 Corruption refers to bribery in any form, including the offering, promising, giving, demanding, or receiving money, property, or any other benefit that is inappropriate for a government official, government agency, private sector, or those who have duties, whether directly or indirectly, to allow such persons to perform or refrain from performing their duties in order to acquire or maintain business.


#### 4. Policy

##### 4.1 Code of Business Conduct

To achieve the intent of conducting business in accordance with the Company's objective framework that adheres to morality, honesty, and transparency which are important factors in conducting business. Refrain from engaging in any businesses that violate the law or are contrary to public order or good morals.

##### 4.1.1 Treatment of Stakeholders

The Company prioritizes and treats stakeholders fairly, respects their rights, fosters understanding, and encourages creative cooperation in order to achieve sustainability. Stakeholders are clearly defined, classified, and grouped, with the understanding that each group has distinct viewpoints and expectations. As a result, strategies and stakeholder treatment should differ. This is classified into 9 groups, as follows:

  <b>HUMAN RESOURCES</b>	<b>Operating Policy</b> <b>Index Living Mall Public Company Limited</b>		
	<b>TITLE: General</b>		<b>CONFIDENTIAL: 00</b>
	<b>TOPIC: Code of Business Conduct</b>		<b>DOCUMENT CODE: ILM-HR-001</b>
	<b>EFFECTIVE DATE: April 26, 2024</b>		<b>REVISION: 06</b> <b>PAGE: 6 / 24</b>

## 1) Treatment of Shareholders


The Company values every shareholder and is committed to conducting business in accordance with the Company's code of conduct to provide maximum satisfaction and benefit to shareholders, taking into account sustainable growth, value creation, and appropriate and consistent returns. The guidelines are as follows:

- (1) Manage and perform duties to the best of the ability with honesty, fairness, and caution without conflicts of interest for the maximum benefit of all shareholders.
- (2) Do not seek benefits for oneself and others by using insider information that has not yet been disclosed to the public. Do not disclose confidential business information that could lead to reverse repercussions for the Company.
- (3) Disclose important information, financial position, operating results, and future trends of the Company in an accurate, complete, timely, and transparent manner. Disclose the Company's business information to shareholders equally and regularly through easily accessible channels.
- (4) Allow shareholders to propose agenda items and nominate directors prior to the General Meeting of Shareholders and inform shareholders regarding the meeting details and all relevant information needed for decision-making in advance.

## 2) Treatment of Employees

The Company is committed to developing the organization into a learning organization that encourages creativity, skill development, and improvement of potential by providing fair remuneration, health care, safety, and a working environment. Recognize the value of each employee as a key to success and long-term growth. The guidelines are as follows:

- (1) Comply strictly with the law and various employee-related regulations, and treat all employees fairly and equally. There is no discrimination based on race, gender, skin color, religion, national origin, age, physical disability, or any other personal characteristics unrelated to work performance, without threats, terrorization, or similar actions.
- (2) Manage human resources in accordance with the corporate strategies and goals. Evaluate employees' performance and provide fair remuneration based on the performance, attitude, and potential of the employee. Provide appropriate welfare that is fair and comparable to leading companies in the same industry.

  <b>HUMAN RESOURCES</b>	<b>Operating Policy</b> <b>Index Living Mall Public Company Limited</b>		
	<b>TITLE: General</b>		<b>CONFIDENTIAL: 00</b>
	<b>TOPIC: Code of Business Conduct</b>		<b>DOCUMENT CODE: ILM-HR-001</b>
	<b>EFFECTIVE DATE: April 26, 2024</b>		<b>REVISION: 06</b> <b>PAGE: 7 / 24</b>

(3) Develop knowledge, skills, and expertise for employees of every level in a thorough, adequate, and continuous manner that is appropriate to their duties and responsibilities and instill a moral conscience among employees.

(4) Ensure that business operation corresponds to international standards for quality, safety, occupational health, and environment. Maintain a good working environment to ensure employee satisfaction and provide good hygiene and safety for life and property.

(5) Be attentive to comments and suggestions from employees at all levels in an equal and fair manner. Provide channels for employees to report inappropriate behavior or misconduct. Protect whistleblowers from harassment or punishment.

### 3) Treatment of Customers

The Company is committed to providing its customers with high-quality products and services, generating maximum satisfaction in terms of quality and reasonable prices as well as constantly raising standards and maintaining positive and sustainable relationships. The guidelines are as follows:

(1) Dedicated to providing customers with optimal benefits and satisfaction by continuously offering and improving high-quality products and services.

(2) Provide complete and accurate information regarding products and services so that customers have enough information to make decisions without exaggerating or providing misleading information.


(3) Set a fair price for goods and services while avoiding excessive profits when compared to the quality of comparable products or services.

(4) Adhere strictly to the customer's agreement, terms, and conditions. In the event that the agreement cannot be fulfilled, customers must be notified in advance in order to collaborate and find solutions based on best practices and maximum customer satisfaction.

(5) Maintain customer confidentiality and do not use customer information to benefit oneself or others involved.

(6) Develop eco-friendly products and services by using fewer resources, saving energy, recycling, and reusing resources with long service life. Produce goods and services that are safe for consumers' health.



  <b>HUMAN RESOURCES</b>	<b>Operating Policy</b> <b>Index Living Mall Public Company Limited</b>		
	<b>TITLE: General</b>		<b>CONFIDENTIAL: 00</b>
	<b>TOPIC: Code of Business Conduct</b>		<b>DOCUMENT CODE: ILM-HR-001</b>
	<b>EFFECTIVE DATE: April 26, 2024</b>		<b>REVISION: 06</b> <b>PAGE: 8 / 24</b>

(7) Establish channels and procedures for customers to provide feedback, complaints, and request recommendations for goods and services of the Company.

#### 4) Treatment of Trade Partners

The Company strictly adheres to the framework of fair and honest trade competition, ensuring mutual benefits for trade partners as agreed upon in the agreement. The guidelines are as follows:

- (1) Treat trade partners equally, impartially, and fairly, with the goal of receiving fair returns for both parties.
- (2) Comply with the terms and conditions of the contract. In the event that the agreement can not be fulfilled, customers must be notified in advance in order to collaborate and find solutions.
- (3) Do not demand, receive, or pay any benefits dishonestly when conducting business with trade partners.
- (4) Maintain trade partners' confidentiality and refrain from using the information for personal gain and others involved.


#### 5) Treatment of Joint Ventures

The Company commits to treat and cooperate with all joint ventures fairly in order to successfully carry out the objectives of joint venture business and achieve long-term growth. The guidelines are as follows:

- (1) Develop the joint venture's business plan with joint ventures. Encourage the exchange of ideas, suggestions, and collaborative problem-solving. Ensure that the joint venture's operations are consistent with the goals to generate maximum benefit.
- (2) Consider, review, and improve joint venture operations on a continuous basis to achieve sustainable development and growth.
- (3) Ensure joint venture operations adhere to legal frameworks and business regulations.
- (4) Collaborate with joint ventures to allocate benefits fairly and transparently without taking advantage of joint ventures.

#### 6) Treatment of Creditors

The Company is committed to treating creditors with equality, fairness, and transparency, and strictly adhering to the terms and conditions of contracts. The guidelines are as follows:

  <b>HUMAN RESOURCES</b>	<b>Operating Policy</b> <b>Index Living Mall Public Company Limited</b>		
	<b>TITLE: General</b>		<b>CONFIDENTIAL: 00</b>
	<b>TOPIC: Code of Business Conduct</b>		<b>DOCUMENT CODE: ILM-HR-001</b>
	<b>EFFECTIVE DATE: April 26, 2024</b>		<b>REVISION: 06</b> <b>PAGE: 9 / 24</b>

(1) Ensure contracts with creditors are legal, equitable, fair, and transparent, without taking advantage of the parties involved.

(2) Avoid corrupt methods or concealing any important information or facts that may be detrimental to creditors.

(3) Ensure accurate, complete, and transparent reporting of financial position to creditors in accordance with the terms and conditions of the contract.

(4) Ensure timely and complete repayment of the loan to all creditors.

7) Treatment of Society, Community, and the Environment

The Company is committed to being responsible towards society, communities, and the environment in terms of safety, quality of life, and promoting efficient use of energy. The guidelines are as follows:

(1) Be aware of one's responsibility to society, community, and the environment. Conduct businesses in accordance with environmental laws and regulations.

(2) Consider alternatives to utilizing natural resources without causing any impact or having the least impact on society, communities, the environment, and people's quality of life.


(3) Promote activities that benefit society, community, and the environment, especially the communities around the Company's premises.

(4) Support foundations and public charitable organizations to assist and create opportunities for the underprivileged in society to live better lives.

(5) Promote and support youth development activities and projects.

(6) Cultivate and promote ongoing awareness and responsibility for society, communities, and the environment among employees of all levels.

(7) Respect the legal ownership and use of natural resources, forests, and land. Refuse to accept the forced or illegal acquisition or use of natural resources, forests, and land.

  <b>HUMAN RESOURCES</b>	<b>Operating Policy</b> <b>Index Living Mall Public Company Limited</b>		
	<b>TITLE: General</b>		<b>CONFIDENTIAL: 00</b>
	<b>TOPIC: Code of Business Conduct</b>		<b>DOCUMENT CODE: ILM-HR-001</b>
	<b>EFFECTIVE DATE: April 26, 2024</b>		<b>REVISION: 06</b> <b>PAGE: 10 / 24</b>

(8) Consider land use and changes in land uses without causing any impact on the community, environment, and people's quality of life, or having the least impact, as well as providing a complaint mechanism regarding land use by referring to the Company's complaints procedure.

#### 8) Treatment of Government Agencies or the Public Sector

The Company gives importance to domestic and international government agencies in the countries where the Company invests to avoid actions that may result in inappropriate behavior, cooperate, and comply with the requirements of government agencies or the public sector. The guidelines are as follows:


- (1) Comply strictly with the law and related regulations, and keep in mind that laws, rules, customs, and traditions in each location may have different conditions, procedures, and practices.
- (2) Maintain integrity and honesty when dealing with government officials or agencies by not taking any action that benefits or indicates dishonest intentions toward government officials.
- (3) Pay attention to suggestions and feedback from government agencies and the public sector.

#### 9) Treatment of Business Competitors

The Company treats business competitors according to the framework of trade competition, considering fairness, business ethics, and competition law. The guidelines are as follows:

- (1) Conduct business in accordance with free and fair competition in accordance with applicable laws, without taking advantage of competitors by using illegal means.
- (2) Do not seek confidential information from business competitors dishonestly or inappropriately, and do not engage in any activity that violates the competitors' intellectual property.
- (3) Do not make malicious accusations against business competitors without factual information.

#### 4.1.2 Disclosure of Company Information

  <b>HUMAN RESOURCES</b>	<b>Operating Policy</b> <b>Index Living Mall Public Company Limited</b>		
	<b>TITLE: General</b>		<b>CONFIDENTIAL: 00</b>
	<b>TOPIC: Code of Business Conduct</b>		<b>DOCUMENT CODE: ILM-HR-001</b>
	<b>EFFECTIVE DATE: April 26, 2024</b>		<b>REVISION: 06</b> <b>PAGE: 11 / 24</b>

The Company adheres to the fairness and transparency principles. An information disclosure policy was developed to instill confidence in shareholders, investors, the public, and other stakeholders that the Company will disclose information accurately, clearly, and in accordance with the law, with easy access to the information.


- 1) Disclosing Material non-public Information carefully, correctly, completely, and timely to ensure that shareholders or investors receive information adequately, equally, and can easily access the information.
- 2) Disclosing Material Public Information clearly and completely in order to avoid confusion.
- 3) Disclosing Non-material Information based on facts without any intention to lead others to misunderstand the facts regarding financial position, performance, and stock prices.
- 4) Disclosing Forward-Looking Information with caution and explaining the conditions or assumptions used in making the forecast.
- 5) The Board of Directors, Chairman of the Company, Managing Director, and/or persons assigned by the Board of Directors or the Company President or the Managing Director has the right to answer questions or provide important information that has not yet been disclosed to the public.

#### 4.1.3 Refrain from Political Engagement

The Company has a management policy to comply with the law without political engagement. The guidelines are as follows:

- 1) Remain strictly neutral. Do not act in favor of any parties.
- 2) Do not advertise to persuade or support political campaigns in the Company. Do not organize any political activities which will benefit any party.
- 3) Do not provide financial assistance, resources, or other assets, whether directly or indirectly, to politicians, political parties, or any political power group.
- 4) Encourage employees to vote in accordance with the constitution, as good citizens.


#### 4.1.4 Anti-Corruption

  <b>HUMAN RESOURCES</b>	<b>Operating Policy</b> <b>Index Living Mall Public Company Limited</b>		
	<b>TITLE: General</b>		<b>CONFIDENTIAL: 00</b>
	<b>TOPIC: Code of Business Conduct</b>		<b>DOCUMENT CODE: ILM-HR-001</b>
	<b>EFFECTIVE DATE: April 26, 2024</b>		<b>REVISION: 06</b> <b>PAGE: 12 / 24</b>

The Company is committed to conducting business with honesty and integrity. An anti-corruption policy was established to combat all forms of corruption wherever business is conducted, which directors, executives, employees, and intermediaries must follow when contacting and coordinating subcontractors (or agent companies) and third-party providers of product distribution or other services on the Company's behalf. The guidelines are as follows.

- 1) Directors, executives, and employees of the Company are prohibited from taking part in corruption in all forms, whether directly or indirectly. Even if there is an intent to receive or continue business services, no action can be taken.
- 2) Do not bribe government officials, political parties, or organizations in the form of state enterprises or other forms of companies owned by the government, whether directly or indirectly, or through 3rd parties, including officials of various companies and joint ventures that are owned by the government or partially owned by the government.
- 3) Establish a regular and thorough review of performance, as well as reviewing procedures and requirements to ensure compliance with business changes, regulations, and legal requirements.
- 4) Supervisors at all levels have the responsibility to communicate and educate employees regarding anti-corruption measures in order for employees to perform tasks efficiently by following the guidelines in this operating policy.
- 5) Employees should not be ignorant or negligent when observing actions that are considered to be corrupt in the Company. Employees must notify the supervisor or the responsible person, and cooperate in the fact-finding investigation.
- 6) Employees who report corruption or refuse to take part in corruption are protected and treated fairly.
- 7) Any corruption violates the Company's code of business conduct. As a result, disciplinary action will be applied in accordance with the Company's Articles of Association. This may involve legal penalties if it is illegal.
- 8) In situations where an employee is forced to pay money to avoid physical harm or when the employee's family is threatened, this is regarded as an immediate threat to the employee's health and safety, as well as that of their family. As a result, this "payment for safety" will be cautiously considered. Employees must report such incidents to their supervisors and/or human resource management and development as soon as possible.

#### 4.1.5 Whistleblowing

  <b>HUMAN RESOURCES</b>	<b>Operating Policy</b> <b>Index Living Mall Public Company Limited</b>		
	<b>TITLE: General</b>		<b>CONFIDENTIAL: 00</b>
	<b>TOPIC: Code of Business Conduct</b>		<b>DOCUMENT CODE: ILM-HR-001</b>
	<b>EFFECTIVE DATE: April 26, 2024</b>		<b>REVISION: 06</b> <b>PAGE: 13 / 24</b>

The Company provides protection and fairness to whistleblowers who report corruption or provide information about corruption or non-compliance with regulations. This includes Company Articles of Association, violations of human rights, or any other matters related to all reporters both inside and outside the Company. The guidelines are as follows:

1) Employees who witness actions that violate the law, the Company's Articles of Association, the code of business conduct, or human rights, as well as employees who are harassed, threatened, or subjected to disciplinary action, have the right to file a complaint with their trusted supervisors at all levels and those in charge of human resource management and development. Third parties have the right to file complaints through the Company's provided channels.

2) Complaint Channels

(1) Employees can make a verbal or written complaint directly via telephone or electronic mail as follows:


- Telephone number + 662 898-6420-5 ext. 2205. Available every Monday through Friday during business hours.
- Electronic mail at [hr\\_service@indexlivingmall.com](mailto:hr_service@indexlivingmall.com) or [ethics\\_hotline@indexlivingmall.com](mailto:ethics_hotline@indexlivingmall.com).
- The Company website at <https://investor.indexlivingmall.com/en/cg/whistleblowing-channel> or <https://investor.indexlivingmall.com/th/cg/whistleblowing-channel>.

(2) Third parties can make verbal or written complaints directly via telephone or electronic mail as follows:

- Direct line telephone number 1379. Available every day from 09.00 - 18.00 or + 662 898-6420-5 from Monday to Friday during business hours.
- Electronic mail at [customerservice\\_online@indexlivingmall.com](mailto:customerservice_online@indexlivingmall.com) or [ethics\\_hotline@indexlivingmall.com](mailto:ethics_hotline@indexlivingmall.com).
- The Company website at <https://investor.indexlivingmall.com/en/cg/whistleblowing-channel> or <https://investor.indexlivingmall.com/th/cg/whistleblowing-channel>.

(3) The whistleblower can report through multiple channels, and the complainant's identity is not required.

(4) If the whistleblowers do not wish to reveal their name, they must provide clear and sufficient details of facts or evidence demonstrating that there are reasonable grounds to believe that such action has violated the Company's law, rules, and Articles of Association.

  <b>HUMAN RESOURCES</b>	<b>Operating Policy</b> <b>Index Living Mall Public Company Limited</b>		
	<b>TITLE: General</b>		<b>CONFIDENTIAL: 00</b>
	<b>TOPIC: Code of Business Conduct</b>		<b>DOCUMENT CODE: ILM-HR-001</b>
	<b>EFFECTIVE DATE: April 26, 2024</b>		<b>REVISION: 06</b> <b>PAGE: 14 / 24</b>

3) Complaints are treated with complete confidentiality. The recipient of the complaint will keep it confidential to prevent retaliation against the whistleblower.

4) Establish a quick process for verifying, investigating, and gathering facts from reported incidents. If it is discovered to be true as reported, the Company will consider appropriate methods to correct, prevent, and mitigate damages for the victims and those involved, as well as whether it may have an impact on the reputation, image, financial position, and business operations of the Company. Such incidents must be proposed to the Board of Directors, directors, and executives for consideration as soon as possible.

#### 5) Whistleblower Protection

(1) The whistleblower may choose not to reveal their identity if they believe that disclosing such information will be harmful to them. However, specific facts or evidence must be specified to demonstrate that there are reasonable grounds to believe that an action has been taken that violates the law, rules, and Articles of Association of the Company.

If the whistleblower chooses to reveal their identity, corrective action will be taken immediately, and the results or additional information will be provided to the whistleblower.


(2) The Company considers all related information to be confidential and will only disclose it when necessary, taking into account the whistleblower's safety and damage. The responsible person will keep the source of information or related persons strictly confidential and will not reveal it to anyone else. If violated, it is considered a disciplinary offense.

(3) Whistleblowers will receive appropriate protection during and after the investigation. If the whistleblower believes he or she is in danger or will suffer damage, he or she can request that the Company determine appropriate protection measures, or the Company may implement protection measures without the whistleblower's request.

(4) Those who commit offenses must face disciplinary action in accordance with the Company's Articles of Association. This may result in a legal punishment if the action is illegal.

(5) Victims will be relieved from the damage through a fair process.

#### 4.1.6 Non-Discrimination

  <b>HUMAN RESOURCES</b>	<b>Operating Policy</b> <b>Index Living Mall Public Company Limited</b>		
	<b>TITLE: General</b>		<b>CONFIDENTIAL: 00</b>
	<b>TOPIC: Code of Business Conduct</b>		<b>DOCUMENT CODE: ILM-HR-001</b>
	<b>EFFECTIVE DATE: April 26, 2024</b>		<b>REVISION: 06</b> <b>PAGE: 15 / 24</b>

Consider human dignity, equality, and fairness without discrimination based on race, nationality, origin, ethnicity, gender, language, age, skin color, physical appearance, religious beliefs, expression, education, social status, culture, customs, union membership, gender diversity, or any other issue.

#### 4.1.7 Anticompetitive Practices

The Company is committed to conducting business with honesty and integrity, taking into account fairness and ethics, and complying with trade competition rules and laws. The Company conducts business with voluntary trade practice, without discrimination, and has clear standards in a written agreement.

- (1) Promote and comply with free and fair competition rules.
- (2) Avoid any actions that may distort market prices.

#### 4.1.8 Confidentiality of Information

There are measures in place to protect the disclosure of the Company's confidential information, employees, and all groups of stakeholders in order to prevent the information from being used for wrongful purposes. This includes limiting the right to access confidential information to an authorized person only.

#### 4.1.9 Conflicts of Interest


Directors, executives, and employees should avoid any actions that may cause a conflict of interest as follows;

1. Avoid having the same nature of business that competes with the business of the Company.
2. Avoid holding shares in the Company's competitors in a significant amount.
3. Disclose any personal business or business of the family, relatives, or dependents that may cause a conflict of interest.
4. Do not seek benefits for oneself or others.

#### 4.1.10 Insider Trading/Dealing

The Company recognizes it is the responsibility of directors, executives, and employees to protect the Company's confidential information, especially material non-public Information that affects business operations or stock prices.



  <b>HUMAN RESOURCES</b>	<b>Operating Policy</b> <b>Index Living Mall Public Company Limited</b>		
	<b>TITLE: General</b>		<b>CONFIDENTIAL: 00</b>
	<b>TOPIC: Code of Business Conduct</b>		<b>DOCUMENT CODE: ILM-HR-001</b>
	<b>EFFECTIVE DATE: April 26, 2024</b>		<b>REVISION: 06</b> <b>PAGE: 16 / 24</b>

1) Do not use opportunities or information obtained as a director, executive, or employee for personal gain or for any businesses that compete with the Company or related businesses.

2) Do not use insider information for personal gain for trading the Company's shares or provide insider information to others for the purpose of trading the Company's shares.

3) Do not disclose confidential business information to third parties, particularly competitors, even if one's status as a director, executive, or employee of the Company has ceased.

#### 4.1.10 Safety, Occupational Health, and Working Environment

1) Committed to the highest standards of safety, occupational health, and working environment in order to ensure the safety of employees and others involved.

2) Comply with safety, occupational health, and environmental laws, regulations, and international standards across all company operations.

3) Manage risks regarding safety, occupational health, and working environment to minimize and control the risk of accidents. Establish procedures and control operations to eliminate or reduce the risk of accidents. In addition, emergency response plans must be in place.


4) Training to raise employee awareness of safety, occupational health, and working environment to ensure good health and safety at work.

#### 4.1.11 Data Security and Information Technology Security

1) Security measures are in place to ensure data security and information technology security by adhering to laws and international standards.

2) Protect the privacy rights of data owners. and protecting, preventing, and not disclosing the personal information of employees and all stakeholders.

#### 4.2 Code of Conduct for Employees

  <b>HUMAN RESOURCES</b>	<b>Operating Policy</b> <b>Index Living Mall Public Company Limited</b>		
	<b>TITLE:</b> General		<b>CONFIDENTIAL:</b> 00
	<b>TOPIC:</b> Code of Business Conduct		<b>DOCUMENT CODE:</b> ILM-HR-001
	<b>EFFECTIVE DATE:</b> April 26, 2024		<b>REVISION:</b> 06 <b>PAGE:</b> 17 / 24

The retail business is a business related to production, selling products, and providing services to various groups of customers. Therefore, employees should have a code of conduct to adhere to as a guideline for practice as follows:

#### 4.2.1 Code of Conduct in Personal Matters

Employees are entitled to personal freedom of conduct. However, certain actions may affect the Company due to the role and responsibilities of the employees and the actions. Avoid any actions that may harm the Company's reputation and image, such as:

##### 1) Exercise of political rights

(1) Employees shall have the freedom to exercise their political rights, such as voting in elections or joining a political party. However, employees should avoid assisting political parties during election campaigns, serving on a committee for a political party, or representing a political party in various public activities because it could be assumed that the Company is involved or affiliated with that party.

(2) Employees must not use the Company's name, job title, company budget, or working hours in carrying out political activities, without permission from the authorized person of the Company.

(3) Differentiate political activities in which the employee is involved with the Company's business, such as not wearing the Company's uniform, displaying the Company's symbol, or claiming to have a relationship with the Company while expressing political rights.


##### 2) Positioning in society

Employees must follow rules, regulations, and guidelines based on the law, ethics, culture, customs, and fundamental values of the Company to uphold their honor and dignity in order to be accepted and respected in society and keep a positive image of themselves and the Company at all times.

##### 3) Using data for profit

Employees will not pursue benefits for themselves or others by taking advantage of the Company's information, or where others understand that they are relying on the Company's information to seek benefits for themselves or partisan.

##### 4) Competition with the Company

  <b>HUMAN RESOURCES</b>	<b>Operating Policy</b> <b>Index Living Mall Public Company Limited</b>		
	<b>TITLE: General</b>		<b>CONFIDENTIAL: 00</b>
	<b>TOPIC: Code of Business Conduct</b>		<b>DOCUMENT CODE: ILM-HR-001</b>
	<b>EFFECTIVE DATE: April 26, 2024</b>		<b>REVISION: 06</b> <b>PAGE: 18 / 24</b>

To avoid conflicts with interests, employees must not operate or invest in businesses that may compete with the Company's business, whether directly or indirectly. Do not provide assistance or advice to others that may cause damage or compete with the business of the Company or the Company Group, both domestically and abroad.

5) Acquiring shares or partnering with competitors or trade partners.

Employees may purchase stock or become a business partner of the competitor or trade partners of the Company.

However, there are the following factors to consider:

(1) Employees need to notify the Company if holding shares or are partners of a competing company or trade partner.

(2) Holding shares in a competitor or trade partner may cause employees to act or refrain from acting in accordance with their duties to the Company, which is considered inappropriate and should be avoided.

6) Receiving financial benefits, assets, or gifts from persons who conduct business with the Company.


(1) Employees are prohibited from asking, accepting, or agreeing to take money, assets, rewards, or any other benefits from customers, contractors, sellers, or anyone else conducting business with the Company.

(2) Employees must not participate in joint ventures, trade, lending, borrowing money, solicitation, using checks, exchanging cash, buying goods on credit, buying, selling, renting, or entering into any financial obligations with those conducting business with the Company. This includes contacting companies or department stores to request free or discounted products or services. This may have an impact on an employee's judgment while performing duties. Unless the employees receive official permission or approval from the Company.

7) Receiving gifts from those who conduct business with the Company

Employees must report to their respective supervisors if they receive a gift or souvenir from people who conduct business with the Company that is worth more than what normal people should do to one another or exceeds the Company's conditions in order to demonstrate honesty. Even if the employee has no intention, such items must be delivered to the Company to be used in future employee activities.

8) Non-Company Work

  <b>HUMAN RESOURCES</b>	<b>Operating Policy</b> <b>Index Living Mall Public Company Limited</b>		
	<b>TITLE: General</b>		<b>CONFIDENTIAL: 00</b>
	<b>TOPIC: Code of Business Conduct</b>		<b>DOCUMENT CODE: ILM-HR-001</b>
	<b>EFFECTIVE DATE: April 26, 2024</b>		<b>REVISION: 06</b> <b>PAGE: 19 / 24</b>

(1) Employees must devote their full time and attention to the Company's activities. If employees are required to perform other tasks to increase income or for other purposes, outside work must be performed in the following manner:

- Do not violate the law or violate good morals.
- Do not harm the Company's reputation, image, or business.
- Do not use the Company's confidential information for personal gain.
- Do not interfere with one's work.
- Promote the Company's image or benefit company operations and work system development.
- Refrain from using company time to do outside work to benefit oneself or others.

(2) Employees should notify the Company when it is necessary to work or do activities for any organization.

#### 4.2.2 Code of Conduct Among Employees

##### 1) Giving and receiving gifts

Employees should avoid giving gifts to their superiors, even on special occasions, or accepting a gift from a subordinate (which could be a channel for seeking benefits, developing a habit, or considering having to treat each other in this manner on a regular basis).


##### 2) Conduct and treatment of supervisors

Employees who are supervisors should act in a way that is respected by their colleagues. Employees should not disrespect their superiors in front of or behind their backs.

#### 4.2.3 Protect the Company's Assets

The Company's assets include all movable and immovable property. Technology includes academic knowledge, information, copyright documents, rights, patents, and inventions.

1) Employees have duties and responsibilities to maximize the use of the Company's resources by taking good care of them, maintaining them, and avoiding loss of resources.

  <b>HUMAN RESOURCES</b>	<b>Operating Policy</b> <b>Index Living Mall Public Company Limited</b>		
	<b>TITLE: General</b>		<b>CONFIDENTIAL: 00</b>
	<b>TOPIC: Code of Business Conduct</b>		<b>DOCUMENT CODE: ILM-HR-001</b>
	<b>EFFECTIVE DATE: April 26, 2024</b>		<b>REVISION: 06</b> <b>PAGE: 20 / 24</b>

2) Avoid using the Company's property for personal gain or benefit. Employees must not reveal confidential information or non-closure messages.

#### 4.2.4 Maintaining the Company's Confidentiality

Confidential information is information that the Company keeps confidential and values, which are products, drawings, blueprints, records, and other materials, documents, or records that are the Company's sole property. This includes information regarding the research, manufacturing processes, bill of materials, finance, accounting, sales, personnel management, operations, information regarding customer lists, partners, price lists, customer service requirements, service and equipment costs, pricing, and equipment maintenance expenses, employee knowledge or knowledge that the Company provides to employees while being employed by the Company, as well as any information that affects the Company's operations regardless of what format the information is in.

1) Employees are prohibited from disclosing or allowing others to disclose confidential information or relevant information unless officially authorized by the Company.

2) Employees are forbidden to utilize confidential information for the benefit of themselves or partisan.

3) Employees must not use or disclose confidential information of the Company to any individual or group after their employment ends. "Company information confidential" is a trade secret related to the Company or agents or customers of the Company that the employee has possessed or may possess (but not limited to the definition mentioned above). This includes trade secrets or business-related confidential information such as:

(1) Information of customers or prospective customers, including trade partners, suppliers, or distributors of products for the Company


(2) Name, address, and telephone number of individuals

(3) Time and conditions of the Company's auctions, bids, and contract drafts with a third-party

(4) Price policy, marketing strategy, product strategy, and operating methods

(5) Technical data

(6) Budget and other financial information of the Company and its affiliated companies

  <b>HUMAN RESOURCES</b>	<b>Operating Policy</b> <b>Index Living Mall Public Company Limited</b>		
	<b>TITLE: General</b>		<b>CONFIDENTIAL: 00</b>
	<b>TOPIC: Code of Business Conduct</b>		<b>DOCUMENT CODE: ILM-HR-001</b>
	<b>EFFECTIVE DATE: April 26, 2024</b>		<b>REVISION: 06</b> <b>PAGE: 21 / 24</b>

(7) Management policy and business strategy

#### 4.2.5 Conflicts of Interest

1) Employees will not commit or participate in any acts to obtain or cause conflicts of interest with the Company. Employees must not use their position to plan or obtain interests that will benefit themselves, partisans, or others.

2) Employees must be aware that their spouses, family members, or relatives who work for competitors or conduct business with the Company may benefit from the confidential information from the employees which could harm the Company's interests.

3) Employees should be aware that if their spouses, family members, or relatives also work for the Company, this may result in a conflict of interest in the following situations:


(1) The employee may be a supervisor or subordinate of their spouse, family member, or relatives.

(2) Employees work in a division/department or hold a position that could offer benefits or privileges to the spouse, family members, or their own relatives.

(3) Employees have a romantic relationship with another employee, regardless of level or position, which could compromise mutual benefits or cause a scandal in terms of accuracy, transparency, or fairness with the performance of duties. However, romantic relationships can be male-female, male-male, or female-female.

4) Company policy to prevent conflicts of interest is as follows:

(1) Employees who are married or in romantic relationships must not work in the same department or different department but in the same position or in the same level or have work characteristics that benefit each other or may create conflicts of interest. It may lead to problems or complaints regarding transparency or fairness, such as between supervisors and subordinates, or between the purchasing department and the requesting purchasing department.

  <b>HUMAN RESOURCES</b>	<b>Operating Policy</b> <b>Index Living Mall Public Company Limited</b>		
	<b>TITLE: General</b>		<b>CONFIDENTIAL: 00</b>
	<b>TOPIC: Code of Business Conduct</b>		<b>DOCUMENT CODE: ILM-HR-001</b>
	<b>EFFECTIVE DATE: April 26, 2024</b>		<b>REVISION: 06</b> <b>PAGE: 22 / 24</b>

(2) Employees, family members, or close relations of employees are not permitted to conduct business or provide services to the Company if the employee has a vested interest, authority, or duties in selecting business partners, products, or services, such as:

- Employees are prohibited from investigating prices, purchasing products/services, or selecting business partners who are family members or close friends.
- Employees are also prohibited from choosing products/services from companies or individuals who are related to them.

(3) Employees, family members, or close friends of employees intent to use retail space services, use or exchange retail space, or use any services who have a vested interest in earning income from retail space and/or any services of the Company Group, the Company does not block the opportunity to pursue additional jobs in the Company's retail space. However, for the purpose of fairness and transparency, employees must submit a written request from the supervisor that has the highest authority, which is the managing director, to operate the business in the Company's retail space or any other activities that may create a conflict of interest.

5) The Company requires that personnel management, such as transfers, promotions, and new appointments/recruitments, must be free of conflicts of interest and are the responsibility of supervisors in each line of work. The human resources department must review and act in accordance with company policies.


4.3 The Company reserves the right to change or add to human resource management and develop regulations as deemed appropriate.

#### 4.4 Cancellation Documents

Any notes, announcements, or manuals that contain related messages or contradict these regulations, whether promulgated or practiced, are deemed cancelled and refer to the human resource management and development procedures.

#### 4.5 Approval Authority

4.5.1 The Chief Executive of Human Resource Management and Development has the authority to interpret these regulations if necessary.

  <b>HUMAN RESOURCES</b>	<b>Operating Policy</b> <b>Index Living Mall Public Company Limited</b>		
	<b>TITLE: General</b>		<b>CONFIDENTIAL: 00</b>
	<b>TOPIC: Code of Business Conduct</b>		<b>DOCUMENT CODE: ILM-HR-001</b>
	<b>EFFECTIVE DATE: April 26, 2024</b>		<b>REVISION: 06</b> <b>PAGE: 23 / 24</b>

4.5.2 Management has the discretion to change some, all, or any part of this Human Resource Management and Development Procedure.

## 5. Procedures

5.1 Every employee must report information in accordance with the conflict of interest form (FM-HR-CB-016) in order to demonstrate honesty and transparency in verifying employee information or activities that may violate operating policy regarding the code of business conduct. Employees filled out the information for the first time when they started working for the Company as new employees.

5.2 Employees must follow operating policy and sign the conflict of interest form (FM-HR-CB-016) provided by the Company.

5.3 Supervisory and management employees are responsible for ensuring correct and strict compliance among operating level employees.

5.4 Supervisors at all levels and the Human Resources Department provide advice and guidance to employees when they are unsure or uncertain.

5.5 The Human Resources Department maintains the conflict of interest form (FM-HR-CB-016) in the employee's personnel file or in the employee history database.


5.6 In the event of improvements, changes, or corrections, according to this operating policy, the Compensation and Benefits Committee (C&B) and the Branch Human Resources Department are responsible for communicating with employees to sign as an acknowledgment of the information provided.

5.7 If the Company discovers that an employee intentionally does not display information or present incomplete and incorrect information in accordance with the form specified by the Company, the employee may be considered to have given false or concealed information, which may have a negative impact on the Company.

5.8 The Company may consider transferring employees to work in other positions or departments in order to prevent conflicts of interest as deemed appropriate.

## 6. REFERENCES and FORMS



  <b>HUMAN RESOURCES</b>	<b>Operating Policy</b> <b>Index Living Mall Public Company Limited</b>		
	<b>TITLE:</b> General		<b>CONFIDENTIAL:</b> 00
	<b>TOPIC:</b> Code of Business Conduct		<b>DOCUMENT CODE:</b> ILM-HR-001
	<b>EFFECTIVE DATE:</b> April 26, 2024		<b>REVISION:</b> 06 <b>PAGE:</b> 24 / 24

NO.	Document Code (if any)	(Document Name)
1	FM-HR-CB-016	Conflict of Interest Form

7. ADDENDUM

N/A - none