

## **Code of Conduct**

Land and Houses Public Company Limited and its affiliates recognize and adhere to business conduct under a sound corporate governance code, the foundation of sustainable business operations. Hence, the code of conduct has been established to serve as operating guidelines for directors, executives, and employees, with a commitment to transparency, fairness, and responsibility to all shareholders and stakeholders:

### **1. Compliance with Applicable Laws, Rules, Regulations, and Orders of the Company**

The Company values respect for and compliance with applicable laws, rules, regulations, and its orders. Directors, executives, and employees must comply with such laws and strictly perform their duties under rules and regulations, including orders of the Company. They must recognize and understand their responsibilities in compliance with laws, rules, and regulations related to operations, and collaborate, promote, support, and ensure consistent compliance.

### **2. Anti-Fraud and Corruption**

The Company supports and encourages all personnel to act against all forms of corruption, resist giving or demanding benefits that induce or omit actions in a way that is against the law or that may cause the Company to lose its legitimate interests.

The Company supervises, investigates, and monitors fraud and corruption through the internal control system and allows whistleblowing through the complaint channels provided, in case of witnessing or becoming aware of actions that fall within the scope of fraud and corruptive practices related to the Company.

### **3. Prevention of Conflicts of Interest**

The Company commands measures to prevent conflicts of interest by considering transactions that may accompany conflicts of interest, connected transactions, or related-party transactions by adhering to the rules and regulations of the Stock Exchange of Thailand (SET) and the Office of the Securities and Exchange Commission (SEC). The main principles include:

1) For any transaction of which directors, employees, or related parties having interests in engaging the transaction with the Company, such directors or employees are prohibited from participating in the approval of the transaction, and the price must be set appropriately as same as engaging in a transaction with outsiders.

2) To set prices to prevent conflicts of interest, the prices must be fair, appropriate, and consistent with general trade conditions.

3) In compliance with SET regulations on making related-party transactions, such transactions must be presented to the Audit Committee for consideration and comments before being proposed to the Board of Directors for approval according to the corporate governance code.

4) Disclosure of transactions with possible conflicts of interest, connected transactions, or related-party transactions must be complied with SEC's rules.

### **4. Whistleblowing**

The Company requires that whistleblowing can be done through complaint channels from all stakeholders. In case of encountering inappropriate behaviors, which violate business ethics, laws, human rights, and corruption, the Company commands a process for handling complaints and guidelines for protecting confidentiality of information of the whistleblowers, complainants, and defendants.

### **Channels for Receiving Complaints or Whistleblowing**

Email: whistleblower@lh.co.th

By mail: Internal Audit Department, 1 Q House Lumpini Building, 37th - 38th Floor, South Sathorn Road, Thung Maha Mek, Sathorn District, Bangkok 10120.

## **5. Non-Discrimination and Responsibility to Stakeholders**

The Company values the rights of all stakeholders without discrimination to ensure their basic rights are protected under applicable laws and regulations. Any action that violates such rights will not be taken.

The Company has established guidelines for responsible treatment of each group of stakeholders as follows:

- 1) Treatment of Shareholders
  - Treat all shareholders equally and fairly.
  - Encourage shareholders to exercise their basic rights, such as the right to receive complete and timely information about the Company, to receive dividends, to vote, to appoint a proxy, to attend shareholders' meetings, and to make a decision to vote on crucial matters of the Company.
  - Perform duties with honesty, integrity, care, and professionalism. Do not seek benefits for oneself and family from the Company's non-public information. Do not disclose the Company's confidential information to outsiders. Do not take any action which may cause conflicts of interest with the Company.
- 2) Treatment of Employees
  - Adhere to human rights principles with due regard for equality and personal freedom without discrimination against race, nationality, religion, gender, age, education, and political viewpoint.
  - Determine fair returns, consistent with the level of duties and responsibilities as well as labor market price mechanisms.
  - Provide appropriate welfare.
  - Provide occupational safety, health, and environment.
  - Continuously promote employees' capability development.
  - Equitably and fairly listen to opinions and suggestions from all employees.
- 3) Treatment of Customers
  - Deliver quality products and services at fair prices.
  - Disclose accurate, complete, and forthright information about products and services.
  - Strictly honor terms of contracts with customers. If unable to comply with contracts or conditions, immediately notify customers to jointly seek possible solutions.
  - Set up a contact unit to listen to suggestions, comments or needs of customers for continuous improvement and development.
  - Strive to continuously develop new technologies and innovations to enhance convenience, comfort, and safety for customers.
  - Protect customers' confidential information, including not using the information for undue benefits.
- 4) Treatment of Suppliers
  - Consider equality in selecting suppliers without seeking undue benefits.
  - Strictly abide by laws and conditions mutually determined. If unable to comply with them, immediately notify suppliers to jointly seek possible solutions.
  - Determine a code of conduct for suppliers for the fair and transparent competition.

- Strictly comply with contracts or conditions agreed with suppliers such as in determining delivery periods and payment.
- 5) Treatment of Creditors
  - Honor terms and conditions agreed with creditors.
  - Do not conceal information or facts that will cause damage to creditors.
  - Manage loans to meet objectives.
  - Ensure that loan and interest payments are made on time.
- 6) Treatment of Competitors
  - Comply with competition rules within the legal framework related to trade competition practices.
  - Do not violate or gain access to trade secrets of competitors by fraudulent means.
- 7) Treatment of the Society, Community, and Environment
  - Conduct business with responsibility towards the society, community, and environment.
  - Strictly comply with applicable laws and regulations.
  - Promote efficient use of resources through business activities such as product design, material selection, quality control of products and services, and focus on developing products and services for residents' better quality of life.
  - Advocate activities or projects that are beneficial to the society, community, and environment.

#### **6. Confidentiality and Exploitation of Insider Information**

Non-public information or news that is material to changes in securities prices is considered insider information used for conducting business and is regarded as the Company's confidential information. The Company therefore sets the following guidelines:

- 1) Directors and executives must report their own securities holdings, including those of spouses and minor children who hold the Company's securities.
- 2) Directors and executives must report changes in their securities holdings for every purchase, sale, transfer, or acceptance of transfer of securities within three business days, as required by SEC and SET, and submit a copy of such reports to the Company Secretary.
- 3) Do not disclose the Company's confidential information to outsiders even after dismissal as directors, executives, or employees of the Company.
- 4) Protect the Company's confidential information from leaking to unrelated parties, which may harm the Company and its stakeholders, except when legally required.
- 5) Strictly comply with non-disclosure agreements.

#### **7. Anti-Unfair Competition**

The Company is committed to comply with trade competition laws as well as to support of free and fair competition without discrimination. It also refrains from actions that may restrict the competition and has detrimental impacts on the economy and stakeholders.

#### **8. Occupational Safety, Health, and Environment**

The Company values the health and safety of employees and workers, a critical factor for building morale and quality of good and efficient operations. Hence, it is committed to developing occupational safety, health, and environment management systems under applicable laws and regulations to prevent and reduce risks related to diseases and hazards arising from work, including loss or impacts on employees, workers, and stakeholders, by setting management guidelines through this policy.

## **9. Security of Data, Information Systems, and Intellectual Properties**

The Company values data, information systems, and intellectual properties, which are all factors promoting efficient business operations. It also raises awareness of risks arising from information security threats and cyber threats, including security and reliability of any operation involving the Company's information technology (IT). The operational guidelines for all employees and those assigned by the Company to comply with its contracts or agreements are determined as follows:

- 1) Comply with the information security policy and regulations on the safe application of the Company's computer network system.
- 2) Refrain from disclosing material business information to unrelated parties.
- 3) Refrain from abusing the Company's information system, which can harm its reputation, assets, or the Company itself.
- 4) Comply with laws relating to non-infringement of intellectual properties or copyrights.
- 5) Refrain from violation of intellectual properties or copyrights of others.
- 6) Security of data, information systems, and intellectual properties.

## **10. Code of Conduct for Directors**

- 1) Recruit knowledgeable, competent, ethical, and socially accepted executives.
- 2) Empower executives sufficiently for management flexibility.
- 3) Support and encourage executives and employees to work under the framework of the established codes of conduct.
- 4) Do not seek benefits for oneself and associates from the Company's non-public information.

## **11. Code of Conduct for Executives**

Executives are involved with multiple groups of people such as shareholders, employees, customers, suppliers, competitors, society, community, and the environment. Thus, guidelines for the treatment of each group have been established:

- 1) Executives' Treatment of Shareholders
  - Perform duties with honesty, integrity, care, and professionalism.
  - Refrain from seeking benefits for oneself and associates from the Company's non-public information.
  - Refrain from disclosing the Company's confidential information to outsiders.
  - Refrain from taking any action that may cause conflicts of interest with the Company.
- 2) Executives' Treatment of Employees
  - Treat employees fairly concerning remuneration.
  - Treat employees on life and property safety.
  - Treat employees in good faith on promotional and punishable matters.
  - Treat employees with politeness.
  - Listen to opinions and suggestions rationally.
  - Stress to employees a practical code of conduct.
  - Encourage employees to receive additional training in fields related to their lines of work.
- 3) Executives' Treatment of Customers
  - Treat customers fairly concerning the products and services.
  - Disclose news and information of the products and services accurately and completely.
  - Allow customers to make complaints about defective products and services.
  - Strictly maintain customers' confidentiality to avoid causing damage or annoyance to customers.

- Honor terms and conditions made with customers fairly.
  - If unable to comply with terms or conditions, customers should be notified immediately to jointly seek possible solutions.
- 4) Executives' Treatment of Suppliers
- Refrain from demanding or accepting undue benefits from suppliers.
  - Honor conditions agreed upon with suppliers with a fairly manner.
  - If any condition cannot be met, suppliers should be notified in advance to jointly seek possible solutions.
- 5) Executives' Treatment of Competitors
- Operate within the criteria of healthy competition.
  - Refrain from seeking confidential information of trade competitors through dishonest means.
- 6) Executives' Treatment of Society, Community, and Environment
- Refrain from taking any action that will harm the environment beyond what is allowed by law.
  - Implement or control all the practices to ensure compliance with the intent of laws and regulations.

## **12. Code of Conduct for Employees**

- 1) Perform duties with honesty, integrity, and perseverance.
- 2) Maintain the confidentiality of customers and suppliers in good faith.
- 3) Pay attention to the Company in keeping the environment clean and safe.
- 4) Strictly follow rules, regulations, and announcements of the Company.
- 5) Notify applicable departments in the Company if any unlawful action is detected.
- 6) Maintain the Company's equipment, assets, or interests righteously.
- 7) Maintain and forge unity and solidarity among employees.
- 8) Earnestly care for activities that will enhance quality, efficiency, and development of the Company.
- 9) Do not defame the Company, executives, or other employees groundlessly.
- 10) Refrain from taking action that may cause conflicts of interest with the Company.
- 11) Refrain from encouraging or supporting any parties to commit unlawful acts against the Company to seek commercial benefits for oneself or associates.
- 12) Strictly prohibit weapons, dangerous objects, or any illegal items in working areas.
- 13) Avoid accepting any gifts that make oneself feel uncomfortable in performing future duties. If it is inevitable or in dilemma, report to line supervisors immediately. The gifts received should be only during major festivals such as the New Year.

This code of conduct is effective from May 11, 2023.

Naporn Sunthornchitcharoen  
Chairman of the Board of Directors  
& Chairman of the Executive Committee