

Thai Central Chemical Public Company Limited

CODE OF CONDUCT AND ETHICS

Version1

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Introduction of “Code of Conduct and Ethics”

“The Company and each of its directors and employees (i) will endeavor in good faith to comply with all material laws that apply to the Company, its personnel and its and their activities, both in letter and spirit, (ii) will strive to adhere to the highest standards of ethical conduct and (iii) will attempt in good faith to avoid even the appearance of improper conduct.”

This fundamental principle governs all of our activities. Ethical conduct and business success are inseparable, and no important business objective can be achieved without following this fundamental principle. This Code is intended to help implement this fundamental principle and enable better ethical decision-making.

This fundamental principle applies to and must be observed by the Company, as part of the TCCC group, and the directors, officers and employees (including without limitation all senior or management personnel and all financial or investor relations personnel) of the Company (collectively, **“our personnel,” “we,” “us”** and similar words).

This Code should be provided to our agents, representatives and consultants, and they should be asked to follow the principles and standards set out herein.

This Code covers a wide range of business activities and is supplemented by Company policies and procedures (from time to time in effect and as amended) covering specific functions and activities that should be read in conjunction with this Code (such Company policies and procedures, singly, a **“Company Policy,”** and, collectively, the **“Company Policies”**).

Of course, neither this Code nor the Company Policies cover every situation that may arise. Rather, they set out principles and standards to guide us.

If a law (which term includes any domestic or foreign governmental, regulatory and judicial regulations, rules and orders) applicable to the Company conflicts with this Code or any Company Policy, you must comply with the law. In addition to domestic laws, the laws from other countries may apply when conducting the Company’s business. If a local custom or practice conflicts with this Code or any Company Policy, however, you must comply with this Code and the Company Policies. Regardless as to whether a situation is covered by the law, this Code or a Company Policy, you must conduct yourself at all times in accordance with the fundamental principle set forth above.

Most importantly, if you have a question or need an interpretation of this Code or any Company Policy or if you are in doubt as to the best course of action in a particular situation, ask for help. In addition, if you believe that the current or likely future conduct of any other director, officer or employee or any Company agent, representative or consultant violates, or could reasonably be expected to violate, this fundamental principle, this Code or any Company

Policy, or could reasonably be expected to expose the Company or any of us to legal problems, it is your duty to notify the appropriate Company authority. Talk with your General Manager/Vice President, any member of the "**Compliance Committee**". When questions arise relating to the Company's internal accounting controls or other auditing or accounting matters, you may talk with any member of the Compliance Committee or your General Manager/Vice President, as appropriate, any concerns you have regarding questionable accounting or auditing matters. You can also utilize the Compliance Hotline instead of speaking to those persons referred to above. **All necessary contact information is set forth in "Compliance program"**.

Retaliation for reports of actual or potential misconduct made in good faith is prohibited. This Code protects against retaliation against persons who provide information to (or otherwise assist in) investigations by their supervisors or the government as to possible securities law violations or fraud. Employees are expected to cooperate in internal investigations of misconduct.

Ethical principles are often easy to state but difficult to apply. This Code describes in more detail some of the important practical applications of the fundamental principle set forth in this Introduction. It is important to read this Code and to develop a working knowledge of the laws and Company Policies that directly affect and relate to your job. Neither the Code nor the Company Policies cover every situation that may arise. Rather, they set out principles and standards to guide us.

Living up to this Code must be a way of life at work. Integrity is not an occasional requirement. It erodes when it is not reinforced by practice and weakens if it is not continually and consistently applied to all situations. This Code will be vigorously enforced at every level within the Company at all times. Those who violate this Code will be subject to disciplinary action and possible termination.

This Code, and any Company Policy described in it, does not constitute or create an employment contract or employer-employee relationship between the Company and any other person, including its contractors or their personnel. This Code and the Company Policies are subject to change at any time. You will be informed of any changes and are welcome to ask questions at any time.

1. OUR EMPLOYEES

1-1. Positive Environment

We endeavor to provide a positive work environment respectful of human rights and privacy. We also strive to foster a harassment-free workplace that is free of discrimination of any person based on race, color, religion, gender, pregnancy, national origin, age, disability, social status or any other characteristic protected by law. In addition, we seek to continually improve the openness of our workplace by placing an emphasis on communications between employees and their managers and among all employees, particularly given our diverse backgrounds, so that everyone may perform their work duties better and with greater mutual respect and trust. We understand the importance of achieving a work-life balance and we support all of our employees in such efforts.

BASIC GUIDANCE

- ***Equal Employment Opportunities***

We are committed to provide equal employment opportunities to employees and candidates in compliance with the laws.

- ***Labor Practices***

We engage in fair labor practices and, in particular, we do not use forced or indentured child labor.

- ***Mutual Respect***

We are committed to fostering a work environment in which everyone is respected, and do not tolerate harassment, which may include, without limitation, statements, e-mails, gestures or actions that are offensive, unwanted, intimidating, interfere with job performance, or cause unnecessary discomfort, humiliation or harm to another.

1-2. Health and Safety

Protecting the health and safety of employees is one of our core values. Through management leadership and employee cooperation, we are committed to providing a safe workplace conducive to work. We all have a responsibility to abide by applicable health and safety laws, rules, practices and precautions to protect ourselves, our co-workers, and our customers. We believe that it is important for all of us to finish each day in good health and safely.

BASIC GUIDANCE

- ***Unsafe Acts***

It is important to bring any unsafe act, at-risk behavior, near miss or undesirable exposure that threatens the health or safety of any person to the attention of your General Manager/Vice President as soon as possible.

- ***If There is An Injury***

Promptly and accurately report all injuries. Prompt and accurate reports help us take action to prevent recurrences. Failure to report injuries can increase the risk of recurrence, could delay appropriate medical treatment, and could subject our Company to substantial liability and penalties.

- ***Fitness for Work***

We do not permit the possession, use or sale of illegal drugs on Company property, or the performance of your work under the influence of alcohol or illegal drugs.

- ***Workplace Violence***

We prohibit threats, acts of violence or intimidation or the possession or sale of firearms or other weapons on Company property or in the conduct of any Company business

2. OUR BUSINESS CONDUCT

2-1. Trade Controls

We are committed to compliance with applicable trade control and other related laws of the countries in which we operate, as well as country and regional regulatory programs focused on international security and peace. Trade control laws affect the movement of goods, services and technology across national borders, and apply to many aspects of our operations – not just shipping products.

Exchanges of information within and across national boundaries, including emails and web access, are also subject to trade controls.

BASIC GUIDANCE

- ***Accurate Classifications***

Classify and assign the correct tariff (HTS) number in order to determine the appropriate duty and tax owed. Always remember that undervaluing goods on commercial documents and attempting to derive favorable economic advantage through improper participation in preferential duty programs in an attempt to reduce duty and tax are prohibited.

- ***Export Classifications***

Verify the export classification of the product, software or technology prior to export to determine whether special authorization, such as an export license, is required.

- ***Transaction Screening***

Screen your transactions against applicable rules that restrict transactions with certain sanctioned countries, persons and prohibited end uses.

- ***Business Partner Screening***

Screen your business partners, suppliers and parties involved in your transactions against government-provided watchlists, and conduct appropriate due diligence on end-users and product end uses. In addition, check that transactions are not structured with intermediaries for the purpose of circumventing trade control laws.

- ***Use of Third Party Customs Brokers***

Do not become overly reliant on third party customs brokers and services providers, and take appropriate measures to ensure that we or our agents provide accurate and complete information to government authorities concerning the value of goods, country of origin and other required data elements – particularly for those transactions in which we bear the risks as importer or exporter.

2-2. Supply Chain Compliance

We rely on our network of suppliers and supply chain vendors to deliver quality products and services for our customers. It is critical that our suppliers and supply chain vendors share our commitment to conducting business with integrity, in a safe and secure manner and based on lawful, efficient and fair practices. Adhering to this commitment will help ensure that our supplier and supply chain vendor relationships will not damage our reputation.

BASIC GUIDANCE

- ***Compliance with Laws***

Work with suppliers and supply chain vendors to ensure compliance with applicable labor, environmental, health and safety, and international trade control laws. Appropriate risk-based security measures should be in place through the entire supply chain, from the point of manufacture of a product, through its global transport, and until it arrives at its intended destination.

- ***Screening***

Screen your suppliers and supply chain vendors to ensure that they are reputable, qualified and capable of meeting applicable physical security requirements, by evaluating and approving suppliers and supply chain vendors before any materials, components, products or services are purchased from them. Once vendors are selected, ensure the scope of engagement is clear and documented in an appropriate vendor contract.

- ***No Conflict of Interest***

Ensure the engagement of a supplier or a supply chain vendor does not create an actual or apparent conflict of interest.

- ***Safeguard Confidential and Proprietary Information***

Safeguard our personal data and other confidential and proprietary information with a confidentiality agreement, and protect any supplier-provided personal data and other information that is covered by a confidentiality agreement.

2-3. Product Responsibility

We seek to ensure that products delivered to our valued customers are safe and of high quality. Often times, we are involved in the manufacturing of products that we may supply and distribute to our customers. In those instances, it is important for us to consider how we verify product safety and quality, and contractually manage potential product liability between and among the supplier/manufacturers, our customer and us, during each stage of the supply chain.

BASIC GUIDANCE

- ***Compliance with Laws.*** Thoroughly familiarize yourself with the applicable laws, product labeling requirements, warranty standards, safety and quality control standards, product liability claims procedures and consumer protections relating to the products that you obtain from suppliers/manufacturers and supply and distribute to our customers.

- ***Managing Product Liability***

Ensure that all products that you supply and distribute to our customers are accompanied by a standard manufacturer's product warranty – maintaining Company insurance is not a substitute for obtaining appropriate warranty protection in your business transactions.

- ***Product Liability Claims***

When a product liability claim is received, share all information with appropriate internal Company personnel, promptly verify all material facts and, particularly for those claims involving public safety, endeavor to take reasonable actions, as agreed upon by internal Company personnel, which would generally prevent further threats to public safety and additional product liability claims.

- ***Use of Company Name on Products***

Fully understand the legal significance of displaying our Company name on a product as "seller," "sales agent," "manufacturer," "importer" and the like. Requests by business partners to utilize our Company's name must be reviewed with your legal office and/or any member of the Compliance Committee.

2-4. Competition

We believe in free and fair competition. Most countries in which we operate have developed competition laws that are designed to promote a free, open and competitive marketplace and:

- **Prohibit agreements or understandings between competitors that undermine competition, such as cartels and bid rigging;**
- **Regulate abusive behavior of companies that dominate a market, such as predatory pricing, tying and price fixing; and**
- **Require reporting, prior review and in some instances clearance for mergers, acquisitions and certain other transactions, in order to prevent transactions that would eliminate or substantially reduce competition.**

Competition laws are complex and global in reach. These laws can operate differently in any particular situation and, therefore, it is essential that you involve your legal office and/or any member of the Compliance Committee early in the process of developing new commercial initiatives. Breaches of competition laws carry potentially serious consequences for both our Company and employees. Penalties range from substantial fines to imprisonment in some countries.

BASIC GUIDANCE

• *When Dealing with Competitors*

Do not propose or enter into agreements or understandings – express or implied, formal or informal, written or oral – or communicate with any competitor concerning:

- **Prices, pricing methods, minimum or maximum prices, stabilizing prices;**
- **Previous, current or future stock levels, production, sales capacity or volume, including agreeing to shut down capacity;**
- **Market share;**
- **Terms or conditions of sale, credit terms;**
- **Costs, profits or profit margins; and**
- **Product or service offering, distribution methods.**

• *When Dealing with Anyone*

Do not propose or enter into agreements or understandings – express or implied, formal or informal, written or oral – or communicate with anyone, including competitors, agents, brokers, customers and the like, concerning:

- **Submitting a bid or preparing bid terms for any purpose other than winning the business; and**
- **Restricting or fixing the price, allocating customers or product lines, dividing territories or markets or setting other terms at which we or a customer may resell or lease a product or service to a third party.**

2-5. Conflicts of Interest

A conflict of interest may arise when your private interest interferes or even appears to interfere with our Company's interests. All business decisions should be made solely in our Company's best interest, and not for any personal gain. You must work objectively and effectively for our Company.

BASIC GUIDANCE

• *Personal Financial Interests*

A conflict of interest may arise when you or a relative have financial interests, a job or a position on the board of directors with any of our competitors, suppliers, distributors or vendors. In addition, a conflict of interest may exist when you or a relative directly or indirectly has a significant financial investment in any company that competes, does business or seeks to do business with our Company. You must disclose your and your relatives' financial interests, jobs or positions with any competitors, suppliers, distributors and vendors to your General Manager/Vice President.

• *Related Party Dealings*

A conflict of interest may arise when a family member or someone with another close personal relationship with you works in your department or on your management team. These situations should be handled with caution.

• *Outside Business Activities*

A conflict of interest may occur when you are engaged in a second job or business of your own that may conflict with your responsibilities to our Company. You may not take another job that interferes with your ability to do your job at our Company, and you may be required to obtain Company approval prior to engaging in such activity.

This may include conducting an outside business during working hours, using Company property, equipment or information for non-Company uses, and taking separate employment with a supplier, competitor or vendor of our Company. Please consult with Human Resources Division.

• *Corporate Opportunities*

A conflict of interest may arise when you take advantage of personal opportunities based on information obtained through our Company, customers, suppliers, contractors, consultants or other business partners. You may not compete with our Company, or personally take for yourself any opportunities that are discovered or generated through the use of Company property, information or position.

2-6. Exchanging Gifts and Entertainment

In many cultures, exchanging courtesies such as modest gifts and entertainment is an integral part of conducting business. In other cultures, exchanging gifts and entertainment is strictly prohibited. Gifts and entertainment include anything of value, such as cash, discounts, loans, services, prizes, transportation, use of another company's vehicle, use of vacation facilities, stocks or other securities, meals, sporting events, golf outings, tickets and gift certificates.

This is another situation where a conflict of interest may arise. Providing or accepting inappropriate gifts and entertainment has the potential to harm our business and reputation and may be illegal. Giving and/or receiving gifts and entertainment is not appropriate if it creates an obligation, puts the giver or the receiver in a situation where either party appears biased or is done with the intent to influence a business decision.

BASIC GUIDANCE

- ***Compliance with Applicable Laws and Industry Standards***

You must comply with Thai laws, regulations, industry standards and customs, or more stringent business department or regional policies of your operations.

- ***Scope of Application of Gift and Entertainment Policies***

The rules for gifts and entertainment apply year-round, even during holidays, and they apply not only to you, but also to your spouse, partner or family members.

- ***When Receiving an Inappropriate Gift***

If you are offered a gift or entertainment that is inappropriate, you should decline. If you find yourself in a situation where refusing the gift would embarrass or hurt the person offering it, you may accept the gift on behalf of our Company and then report it to your General Manager/Vice President.

- ***Avoid Compromising Appearances***

Avoid the appearance of giving or accepting a bribe, payoff or kickback, and compromising your ability to make decisions in the best interest of our Company.

2-7. Bribery and Corruption

We prohibit bribery and corruption in all our business dealings. Bribery involves giving, promising to give or offering to give, cash or anything of value, either directly or indirectly, to any person deliberately to influence that person's decision, to secure an improper commercial advantage, to enter into a dishonest arrangement or to otherwise assist our Company in obtaining or retaining business. Most countries have laws prohibiting bribery and corruption, which may apply even when committed outside the country. A breach of these laws is a serious offense, which can result in fines on our Company and employees and the imprisonment of employees. Even the appearance of a breach of these laws can have serious reputational impact on our Company.

BASIC GUIDANCE

• *Dealing with Government Officials*

You must not give, offer or promise to give to any government official or any similar person acting in an official capacity, any unauthorized payments or other benefits or things of value. Likewise, payments to third parties are prohibited while knowing that all or a portion of such payments or things of value will be offered, given or promised, directly or indirectly, to any government official for an improper purpose.

• *Facilitation Payments.*

Facilitation payments, which are payments to government officials to obtain routine services to which our Company is otherwise legally entitled, may be deemed a form of bribery and are generally prohibited. If you are asked to make a facilitation payment, you should consult with your legal office and/or any member of the Compliance Committee for guidance.

• *Use of Third Party Agents.*

We often meet our obligations through partnerships with third parties, such as agents, representatives, independent contractors, consultants, distributors and suppliers.

- In selecting and monitoring third-party agent relationships, you are recommended to:
- Conduct adequate due diligence on third-party partners to ensure they are reputable and qualified;
- Document third-party relationships in writing and ensure all transactions are transparent;
- Require any person or firm who represents us to comply with this Code, Thai anti-bribery and anti-corruption policy and related laws; and
- Verify that we are paying no more than fair market value for products or services.

• *Accurate Books and Records*

All Company officials, employees, and agents are required to keep accurate and transparent records that reflect actual transactions and payments, including facilitation payments when authorized, consistent with our system of internal accounting controls. Reports on facilitation payments must state why the payment was unavoidable, the amount, the date, the purpose and the recipient of the payment.

2-8. Money Laundering and Racketeering Prevention

We are committed to complying fully with all anti-money laundering, racketeering and anti-terrorism laws throughout the world. Money laundering occurs when individuals or companies involved in criminal activity – e.g., racketeering, terrorism, narcotics, bribery and fraud – try to “launder” the proceeds of their crimes to hide them or make them appear legitimate.

BASIC GUIDANCE

- ***Legitimate Business Activities***

We conduct business only with reputable customers and suppliers involved in legitimate business activities, with funds derived from legitimate sources. We will not transact business with any organization that is or has been influenced or compromised by organized crime or terrorism. Failing to detect relationships and transactions that place our Company at risk can severely damage our integrity and reputation.

- ***Appropriate Due Diligence***

Each Company business is required to implement appropriate due diligence procedures to review risks, including those involving new customers, and to take reasonable steps to prevent and detect unacceptable and suspicious forms of payment.

- ***Report Suspicious Activity***

If you detect a suspicious transaction, report the matter to your legal office and/or any member of the Compliance Committee and cooperate with law enforcement authorities as appropriate.

2-9. Community and Political Activities

As we do business across the globe, we endeavor to build and maintain relationships of trust with our local stakeholders by engaging in dialogue and participating in activities that impact on local communities. We believe in participating in and contributing to our communities and encourage employees to do the same.

BASIC GUIDANCE

- ***Community Activities***

We encourage you to be active members of your communities and to participate in community activities as you wish, keeping in mind that your activities should be purely personal, not on behalf of our Company and at all times in compliance with relevant laws.

- ***Political Activities and Contributions***

The rules governing participation in the political process differ greatly from country to country, are complex and often carry significant penalties for violation. Consult and coordinate with your legal office and/or any member of the Compliance Committee before you engage in political activities or make a political contribution on behalf of our Company.

3. OUR ASSETS AND INFORMATION

3-1. Proprietary and Confidential Information

Our proprietary and confidential information are valuable assets of our Company. Proprietary information includes intellectual property such as trade secrets, patents, trademarks and copyrights, as well as business plans, engineering and manufacturing ideas, designs, databases and records.

Confidential information includes information such as business strategies, current and potential transactions, pending contracts, unannounced earnings, new products, salary information, financial data, and research results which have not been disclosed to the public, as well as other non-public information that might be of use to competitors or harmful to our Company or customers if disclosed. Confidential information also includes information of others, such as suppliers, with whom our Company has agreed to hold such information in confidence.

You are required to take all appropriate steps to optimize the value of and/or maintain the secrecy of these assets.

BASIC GUIDANCE

- ***Third Party Rights***

Take appropriate steps to understand third party proprietary rights, particularly when entering into new business transactions.

- ***Disclosure of Information***

If you have knowledge of or access to confidential and proprietary information, you must not disclose such information to others, except to those of us who need to know it and are informed of its confidential or proprietary nature. Proprietary and confidential information must not be shared outside our Company without authorization and there being a confidentiality agreement in place with the party to whom such information would be disclosed.

- ***Use of Information***

You must not use confidential and proprietary information for personal benefit or the benefit of related parties, such as your friends and relatives.

- ***If You cease to be An Employee***

All confidentiality obligations that bound you during your employment with our Company will continue to apply to you even after you cease to be employed by our Company.

3-2. Data Privacy

A growing number of countries are more stringently regulating the collection and use of individual medical, financial and other sensitive personal information. In addition, many countries regulate the personal data of employees and business partners. Personal data is any information that can be used to specifically identify an individual (and in some countries, a legal entity), including, without limitation, a postal address, credit card number, national identification number, passport number, sensitive human resources information, birth date or age, personal phone number or personal e-mail address. We are committed to handling personal data responsibly and in compliance with applicable privacy laws.

BASIC GUIDANCE

- ***Understand the Limitations on Personal Data Usage***

Be aware of personal data in the area in which you work, and understand the legal and contractual limitations on the use of personal data.

- ***Be Vigilant About Protecting Personal Data***

Take appropriate measures to keep personal data secure in compliance with applicable laws (e.g., encrypt, password protect, secure in locked area, etc.).

- ***Adhere to Data Privacy Laws***

Collect and use personal data in compliance with all applicable data privacy laws and regulations, and for legitimate business purposes only. Share personal data with other employees only when it is required to do their job, and with vendors or suppliers only when appropriate and safeguards have been put in place to protect that personal data.

3-3. Information Technology (IT) Security

Our Company's IT resources (Technology Resources) are critical for our business, and should be protected with the utmost care. Our Technology Resources would include, for example, Company-issued laptop and desktop computers, mobile computing devices, and the Company's telephones. You are responsible for protecting our Company's Technology Resources entrusted to you and for helping to protect our Company's assets in general.

BASIC GUIDANCE

- ***Company IT Security Policies and Procedures***

Familiarize yourself and comply with IT security policies, and consult with IT Division, should you have questions and/or concerns.

- ***Use and Ownership of Technology Resources***

You must exercise sound and appropriate judgment and discretion when using our Company's Technology Resources. They are intended to be used primarily for Company business purposes; however, incidental and occasional personal use is permissible. Our Company's Technology Resources are the sole property of our Company.

- ***Safeguard Technology Resources and Report any Loss or Theft.***

Technology Resources must be kept secure from unauthorized access and should not be left unattended while traveling. Immediately report any losses or thefts to your General Manager/Vice President and your local police department, as appropriate.

- ***Passwords and Other Access Safeguards***

Protect our Company's confidential information and Technology Resources – encrypt or password-protect data and do not share your pass codes with others.

- ***Company Monitoring of and Access to Technology Resources***

Subject to applicable law, our Company reserves the right to access and monitor all Internet and e-mail usage, track all Internet sites visited by you and listen to stored voice mail messages.

3-4. Creating and Managing Business Records

All data created by Company employees must accurately reflect underlying transactions and events, and the resulting records must be appropriately managed to support our Company's ongoing activities and obligations. Our management, shareholders, creditors and other stakeholders rely upon the integrity and availability of the business records we create. When we fail to record information accurately and manage our business records appropriately, we risk damaging our reputation, losing business and decreasing stakeholder confidence.

BASIC GUIDANCE

- ***Business Records Creation and Reporting***

You should exercise special care in preparing, submitting, reporting and otherwise making some form of disclosure of Company business records, whether in paper or electronic form. In particular, all financial books, records and accounts must accurately reflect transactions and events and fully and fairly disclose all pertinent information. These records must also meet both generally accepted accounting principles and our system of internal controls for the country in which you are doing business.

- ***Appropriate Records Management***

You are required to maintain your records in accordance with applicable Company policies for your business, region or function, and to routinely review records under your control and ensure that records are disposed of in accordance with applicable retention periods as required by law. In addition, if you are notified of pending, threatened or anticipated litigation, investigations or audits, you must preserve all documents pertaining to such events.

3-5. Investor and Media Relations

In conducting our business, Company employees communicate regularly with our many stakeholders, investors, government officials, financial analysts, securities exchanges, the media and other important external contacts. Our reputation depends on providing communications and information that are appropriate, thoughtful, accurate and timely.

BASIC GUIDANCE

- ***Disclosures by Authorized Persons***

We authorize only certain individuals to speak to the media and financial community. If you are not so authorized but are contacted by news reporters or others regarding Company activities, results, plans or official positions on a topic, direct such inquiries to your General Manager/Vice President and any member of the Compliance Committee.

- ***Timeliness and Accuracy of Disclosures***

If you are responsible for the disclosure of Company information, you must make timely, accurate and consistent disclosures with respect to the management policy, business activities, financial positions, and other corporate activities of our Company in accordance with applicable laws and regulations. In addition, we strongly believe that timely, accurate and consistent disclosures are desirable in order for our stakeholders to gain better understanding of our Company, even if disclosure is not mandatory.

3-6. Government Requests for Information

Our businesses are highly regulated and wide-ranging, and governments may often request information from us. It is our intention to cooperate with every reasonable and valid request made by any governmental organization. At the same time, we expect our employees to act appropriately so that we preserve our Company's rights to the full protections and safeguards provided by law, including representation by legal counsel when necessary.

BASIC GUIDANCE

- ***Preservation of Records***

Make sure that records and information relevant to any government or regulatory agency inquiry or any litigation are preserved and any automatic systems, including electronic systems, for record disposal are stopped to avoid destruction of relevant records and information relating to such circumstances.

- ***How to Respond to Government Requests***

All routine requests for information by any government agency as well as subpoenas, court orders and requests for depositions, testimony, interviews, or documents must be reported to our head of Legal Office and/or any member of the Compliance Committee.

- ***Government Inspections***

Any request to inspect our facilities or to execute a search warrant must be immediately directed to our head of Legal Office and/or any member of the Compliance Committee. You must allow access where required by Thai law.

3-7. Insider Trading

In the course of your work, you may learn of material, non-public information about our Company or other companies before it is made public. Using this information for your financial or other personal benefit either by inside trading – directly or indirectly buying or selling the securities of any company including TCCC, or by tipping – conveying this information to others to buy or sell the securities of any company, constitutes a violation of Company policy and may even violate the law. We are committed to the principles of fair and open markets for publicly traded securities throughout the world – markets where everyone has an equal chance to succeed.

BASIC GUIDANCE

• *Compliance with Applicable Laws*

We are committed to compliance with applicable insider trading laws of the countries in which we operate. You must not engage in insider trading or tipping using inside information, which includes information that a reasonable investor is likely to consider important in making an investment decision, such as:

- Unannounced mergers, acquisitions or divestitures of businesses, product lines or technologies;
- Unreleased financial results and trends, projections of future earnings or losses or capital increases;
- Significant regulatory, litigation, or contractual developments;
- Significant business tie-ups or dissolutions of business relationships;
- Any other information that, if disclosed, would reasonably be expected to affect the price of a security or would influence your decision to buy, sell or hold a security.

• *Preserve Confidentiality*

Maintain the confidentiality of Company information and do not convey information to anyone outside our Company unless it is necessary for our business activities.

**CODE OF CONDUCT AND ETHICS
CERTIFICATE OF COMPLIANCE**

I understand that Thai Central Chemical Public Co., Ltd. (the “**Company**”) is committed to the highest standards of ethical conduct in achieving its business objectives and, in particular, to ensuring that its activities comply with all applicable laws.

I have received a copy of or have access to the latest version of the Company’s Code of Conduct and Ethics, as amended from time to time (the “**Code**”).

I have read and understood the guidelines and expected conduct described in the Code.

To the best of my knowledge, I am not currently breaching the provisions of the Code and will not do so in the future. I confirm my understanding that any contravention of the Code may result in appropriate disciplinary action.

I acknowledge that I have reviewed and understand this Code and I freely consent to the processing and transfer of personal data related to my employment for the purposes described herein. I have been informed that I have a right to access and correct my personal data and to withdraw this consent at any time upon written notice.

I understand that if I have any questions about the meaning or application of the Code, any Company policy, or the legal and regulatory requirements applicable to my job, I may consult my General Manager/Vice President or Legal Office in the Company.

Employee’s Signature _____ Date _____

Typed or Printed Name of Employee _____

Typed or Printed Name of Department/Division _____