



Code of Conduct Policy

The Platinum Group Public Company Limited

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1. Message from the Chairman of the Board

The Platinum Group Public Company Limited (“the Company”) has always recognized the importance of carrying out business with transparency and integrity, which is a key fundamental of the conduct of the employees.

This policy is divided its segmentation to expand the policy coverage to respond to all related regulations and policies as well as the guidelines for all stakeholders and in line with current business environment. All directors, executives and employees are required to study and well understand this Code of Conduct thoroughly and use their discretion when performing their duties to comply with all principles in this Code in order to maintain the ethical standards which Board of Directors, management and employees at all levels have seriously held on to.

On this occasion I would like to thank all employees of the Company who have complied with our Code of Conduct and behaved as a good citizen. This is a crucial contribution to promote the Company's reputation of sustainability and to support the achievement of our future business goals.

Mr. Palakorn Suwanrath
Chairman of the Board of Directors

2. Vision and Mission

Vision

“To be a leader in commercial real estate development, focusing on comprehensive development encompassing shopping centers, hotels, and office building while supporting community and environmental development, creating appropriate returns for shareholders, and generating customer satisfaction, as well as promoting work-life quality for employees, and seeking business partners for sustainable growth.”

Mission

- Promote the development of the strategic area of Pratunam into a vital economic hub for the country.
- Continuously build strength in the management of comprehensive wholesale and retail centers.
- Enhance the potential of small entrepreneurs, seek business alliances, and uphold responsibility towards society, communities, the environment, and shareholders for sustainable growth.
- Support the development of all types of real estate to meet the demand for business spaces from both domestic and international markets.
- Enhance the potential of the Company's personnel and prepare for future business expansion by promoting creativity and new innovations, as well as aligning personnel's mindsets and work processes with the Company's strategies.
- Strengthen all businesses within the Company group through rapid adaptation to current situations in order to respond to and support ever-changing lifestyles.
- Continuously implement the Business Continuity Plan (BCP) for the safety and maximum benefit of all stakeholders.

3. Introduction to the Code of Conduct Policy

The Code of Conduct Policy of The Platinum Group Public Company Limited (“the Company”) shall be the guideline for both the Company and its subsidiaries to practice in day-to-day operations in order to reflect our commitment to operate all businesses with integrity, fairness and ethics, and to use our best effort to grow each business line for continued and sustained returns to our investors and shareholders within lawful and transparent frameworks.

Who shall comply with this Code of Conduct Policy

This Code of Conduct policy applies to management and employees at all levels in the Company and its subsidiaries. Everyone is obliged, without any exceptions, to follow all the stated codes. The Company may have to take disciplinary action against employees who fail to follow our Code of Conduct. In case of serious offences, the disciplinary action may include suspension or termination.

4. Principles of Code of Conduct Policy

Principle 1: Human and Labour Rights

Human Rights means the fundamental rights inherent to all human beings to be granted and protected from discrimination due to differences in physical appearance, mentality, race, nationality, religion, sex, language age, colour, education, social status or any other status. The rights must also comply with national constitutions of each country and with all of the obligations of treaties or international agreements governed in such country.

Codes of Conduct

1. We will treat each other with respect and equality and will not discriminate on the basis of physical appearance, mentality, national or ethnic origin, religion, sex, language, age, colour, education, social status or any other status.
2. We will be cautious when performing our duties, as well as when working with our business partners, to mitigate the risk of human rights violation in our business operation. We will observe and monitor the respect of human rights and will immediately report to the management if witness any violation.
3. Fair treatment will be applied, without any discrimination, in every employment process, i.e., recruitment, relocation, termination, remuneration, welfare, working hours and day-off, delegation of duties, performance evaluation, training and development, career planning, safety, or any other employment-related decision without discrimination.
4. We will not use any forced labour, labour trafficking or illegal child labour. No employees should be punished by either physical or mental torture in the form of threatening behaviours, retaining, threats, harassing or any acts of violence.

Principle 2: Compliance with laws, regulations, guidelines, announcements and orders

Every executive and employee in the Company have a duty to comply with laws, rules and regulations, announcements, orders and all Company's policies.

2.1 Laws and regulations by external authorities

Since the Company is listed in the Stock Exchange of Thailand (SET), every director, executive and employee is obliged to comply with rules and regulations of SET and the Securities and Exchange Commission as well as other related laws and regulations i.e., Anti-corruption law, Anti-money laundry law, etc.

2.2 Internal rules and regulations, announcements and orders

Every employee is responsible to comply with the Company rules, regulations and orders so that the business operation is efficient and sustainable. Any employee in the Company and its subsidiaries who fails to comply shall face disciplinary action as deemed appropriate.

The Board of Directors, committee members and management team are responsible for establishing and reviewing policies, guidelines and procedures so that the Company shall run its business efficiently with adequate internal control measures to mitigate any potential losses. Moreover, the Board of Director and management team must ensure that all employees are well informed of the policies and procedures specifically relating to their job. Monitoring of employee's compliance must also be appropriately in place.

Codes of Conduct

1. Every employee has duty to review and understand all Company's policies and strictly abide to them.
2. Every employee has duty to always seek new knowledge and understanding of laws and regulations relating to his/her work process.
3. If any questions or uncertainties, employee has a duty to seek for advice from his/her supervisor or related work units i.e., legal department, HR department, etc.
4. No ignorance or expectation to the laws or regulations. He/she is encouraged to seek for advice from related work units.
5. Every employee must not misbehave or misconduct by violating the law.

Principle 3: Protection and proper use of company assets

The Company's assets are intended to be used only to benefit the Company's interests and values so they are not for personal use. "**Company's assets**" include cash, land, real estate, equipment and supplies, inventories, goods owned by the Company and intellectual property rights such as Company's name, logo, patent, copyright, customer information and other properties which the Company owns or has a right to control.

Every employee has duty to safeguard the Company's assets; and not to, or assist others to, take ownership, use or misuse the Company's assets for personal interest.

Codes of Conduct

1. Every employee must use the Company's assets appropriately with the purpose solely for the Company's business.
2. Every employee has duty to protect the Company's assets and information from unauthorized person to access or any other actions which will damage the Company's business.
3. Any movable Company's assets like computer notebook, mobile phone, hand-held electronic machines must not be discarded in the public area or unsafe places.
4. The Company's assets must not be used for personal benefit.

Principle 4: Anti-fraud and anti-corruption

The operation of the Company's businesses must be done in the accurate, transparent and auditable way by strictly following the Company's Anti-Fraud and Anti-Corruption Policy. Employee should not take any actions which might bring about discredit or negative impact on the Company's reputation relating to fraud or

corruption. The codes of conduct of this principle are prescribed in the Anti-Fraud and Anti-Corruption Policy of the Company or announcements.

Principle 5: Conflict of interest

Every director, executive and employee must perform his/her duty for the Company's best interest legitimately and with integrity. Therefore, any actions taken without considering the Company's interest or considering only for personal gain shall be considered as a conflict of interest.

Codes of Conduct

1. It is prohibited for employee to operate or to hold partnership or to be an authorized shareholder or a board member or an executive in any business with the same nature or competitive to the Company.
2. Employee must not enter into any transactions when the contracting party who is a company of which the ownership or partnership is the employee himself/herself or his/her closely related person like family member, relative or close friend, even when such transaction is beneficial to the Company.
3. It is prohibited for employee to use the Company's information for personal gain as specified by related laws and regulations. The information includes data which the employee or others acquired by their position, duties and responsibilities.
4. Employee should avoid involvement or participation in any activities or any relationship with the Company's business partners or other employees which may lead to a conflict of interest.
5. In the event that any director, executive, employee or his/her connected person involves or holds shares in any corporate which is competitive to the Company business or which may lead to any conflict of interest, such person is obliged to report, in written, to the Chairman of the Board of Director or the Chairman of the Executive Committee or the President.
6. In case of employee entering into any related transactions as defined by the SET regulations, he/she is obliged to strictly comply with the regulatory requirements to disclose details of such transaction.

Principle 6: Guidelines about gift, memento, donation and other money contributions

Receiving presents or gifts must be traditional practices and appropriate to maintain good relationship with contractors or joint venture partners and without privileged expectation or company's misconduct considerations. Including follows the provided guidelines in the Company's Anti-Fraud and Anti-Corruption Policy or announcement accordingly.

6.1 Receiving of gifts or mementoes

Codes of Conduct

1. Must be complied with traditional practices.

2. The Board of Directors, committee members, management and employee must not demand or promise to take any personal benefits from customers, business partners or any persons when performing their duties for the Company.
3. The Board of Directors, committee members, management and employee may accept any traditional and lawful gifts of nominal value given during festive seasons. However, if the estimated value of such gift exceeds 5,000 baht (five thousand baht), the gift will be treated as the Company's asset and the receiver must report and submit the gift to the Company's Human Resources Department.
4. The acceptance of any gifts must be lawful and complied to regulatory requirements and good corporate governance policy and other related policies of the Company.
5. In the event that the authorized officer or direct supervisor decides that the acceptance of the gifts, mementoes or any kinds of special offering is not appropriate, the receiver must immediately return such gift back to the giver. If the returning of such gift is not possible, the gift must be treated as the Company's asset and submitted to the Company's Human Resources Department.
6. The gifts or mementoes for special occasions, i.e., joint-venture contract signing ceremonies, awarding ceremonies, CSR activities, etc. are allowed all level of employee to accept the gifts representative the Company. The employee shall report the acceptance of such gifts and keep them as the Company's assets.

6.2 Giving and receiving of money for donations and money contributions

Codes of Conduct

1. Any money donations or contributions must be approved from the Company's executives as specified in the Anti-Fraud and Anti-Corruption Policy; and must have a clear and accurate receipt or any other valid evidence of such donation or contribution.
2. Giving or receiving of money for donations or other contributions must be transparent and legitimate must and be ensured that such transaction did not facilitate the bribery.

Principle 7: Political Action

The Company is neutral in matters of politics without advocating any parties. Even though the Company encourages its directors, management and employees to exercise their rights as law abiding citizens, it is prohibited for any of them to participate in any activities which might create a misunderstanding that the Company involves or supports specific political parties. The Company respects the rights, under the constitution, of its directors, committee members, management and employees to participate in political activities. However, the actions of such persons shall not affect the role and responsibilities with the Company and the need to comply with related laws and regulations.

Codes of Conduct

1. Be shall exercise his/her rights under the constitution and other related laws during his/her non-working hours and without using the Company's name.
2. Be shall exercise his/her political rights using his/her own name and shall avoid any actions that might lead to the misunderstanding that he/she represents the Company in such political involvement.
3. Do not use words and expressions which might mislead others that the Company involves, advocates or supports any political activities, political parties, groups, influencers or political candidates.
4. When participating in any political activities, employees shall not wear the Company's uniform or any official insignia which might mislead that the Company supports such political activities.
5. Be shall avoid expressing his/her political opinion within the workplace or during working hours as it may cause conflicts among the workforce.

Principle 8: Protection of personal information and business information

The Company shall protect information of its stakeholders, i.e., customer information, employee information, vendor information, and all stakeholder information which are obtained during the course of business operations or related activities. The Company shall proceed in accordance with the Act. Protection of Personal Information B.E. 2562 and use its best effort to protect such personal and business information and share them only among authorized persons for legitimate business purposes. Once the information is not necessary for the business operations, with proper authorization, or approved by the authority to perform data destruction, the information will be destroyed with secure method.

Codes of Conduct

1. Disclosure or information utilization, the Company shall allow only related employees as deemed necessary to practice the works or as specified by laws.
2. Elimination of unused information shall be done appropriately to prevent any information leakage.
3. When the disclosure of information is required, the consent from the owner of information must be obtained except when the Company must comply with regulatory requirements.
4. Information and message to be communicated to external parties must be cautiously reviewed; no information about internal discussion or decision within the Company should be disclosed to external parties as it may bring about disadvantages or damages to the Company except for disclosing or forwarding such information to regulatory authorities as required by law or regulation, including disclosing or forwarding information to auditors or the Company's advisor with business necessity or for transparency or as required by applicable laws or regulations.
5. Without the consent of the owner of information, no confidential information shall be discussed or disclosed to others in public.

6. No unauthorized software is allowed to be installed in the Company's computers as well as no inappropriate transfer of information allowed.
7. To support the protection of information, employees shall not use easy-to-guess password to allow access to their computer and other electronic devices.
8. The Company will comply with the Personal Data Protection Act (PDPA), B.E. 2562 (2019), stipulated in all respects and will inform the criteria, including instilling in all employees the importance and operate according to the Company's policy or such laws are strictly stipulated.

Principle 9: Securities trading and prevention of using insider information

Material insider information shall be handled appropriately focusing on the impact to all stakeholders and complying with the Securities and Exchange Act and related regulatory requirements. It shall not be used for personal gains or other person's benefits. Also, the Company's announced policies and procedures relating to insider information must be strictly followed.

Codes of Conduct

1. It is prohibited to take advantage in securities trading by using the non-public information at any given period.
2. It is prohibited for employees to give advice or make recommendation about the trading of the Company's securities except when the person is in the authorized position by the Company and providing the advice in compliance with the regulatory and lawful requirements.
3. It is prohibited for the insiders to disclose or communicate the material non-public information to other employees unrelated to such information and other connected persons like family members, relatives, siblings, friends, etc. except for actions related to the work duties assigned by the Company and in accordance with the rules, regulations, announcements and law.
4. Employees who work in departments responsible for preparing financial reports and their connected persons shall not place a purchase or sell order of the Company's securities during the period of 1 (one) month prior to the public disclosure of the Company's financial reports or any inside information which may affect the price of the Company's securities.
5. The Company will communicate and provide information to directors, executives and operators regarding relevant laws and regulations to have them strictly adhere to the guidelines.

Principle 10: Disclosure of information

The Company's disclosure of information is based on the principles of fairness, transparency and accountable. It must be ensured that the disclosed information is accurate, clear, complied with the law and equally disseminated regardless of how the disclosure is done, i.e. in written, verbally, via press conference or any other channels.

Codes of Conduct

1. Disclosure of information that may cause any effects to company must be done by the authorized person for such matter except for the case that the person has been delegated to perform the disclosure by such authorized person.
2. Disclosure of material non-public information must be done cautiously by responsible person to ensure that the information is accurate, complete, timely and equally and fairly disseminated among every group of stakeholders.
3. Disclosure of any information must be done based on facts without intention to mislead or misinterpret of such facts.

Principle 11: Prevention of money laundry

The Company shall comply with the regulations and laws relating to Anti-Money Laundry. The Company shall not accept any transfer or conversion of assets, or facilitate any transfer or conversion of assets, which related to unlawful activities. The Company shall not become an instrument or channel for transferring, hiding or disguising any assets from illegitimate sources.

Codes of Conduct

1. Before entering into any contracts, it must be ensured that the source of related fund is legitimate.
2. It is prohibited to transfer fund to unknown bank accounts or to receive fund from the unusual or suspicious channels especially from the country which is not related to such transaction.
3. If employees identify any unusual or suspicious transactions, he/she must immediately report to his/her supervisor/manager.

This Code of Conduct (Revision) has been reviewed and approved by the Company's Board of Directors meeting no. 4/2025 on November 11, 2025 with effective date from November 11, 2025 onwards.

-Mr. Palakorn Suwanrath-

Mr. Palakorn Suwanrath

Chairman of the Board of Directors

Date November 11, 2025