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### **Business Code of Conduct**

### **Vision**

To become the world's export center for all types of vehicles

### **Mission**

To accomplish the aforementioned vision, the Company has determined the mission covering 5 main areas as follows:

# 1. Marketing

- 1.1. Proceed flexible marketing strategies that could meet the changes in demands of the world-class standard customers.
- 1.2. Increase market share to the minimum of 80 percent.
- 1.3. Expand the variety of the services to cover other relevant businesses.

### 2. Customers

- 2.1. Improve and maintain operational standard with the responsibility to exporters and world-class standard car manufacturers in order that the service of vehicle shipping to destinations is provided in the most efficient method.
- 2.2. Ensure and satisfy customers by maintaining the standard of Zero Error operation service as well as consistently provide impressive service to customers.

### 3. Management

- 3.1. Establish transparency, good corporate governance and accountability management system.
- 3.2. Encourage development, value added and progress in career path together with safe working environment for employee.

### 4. Information technology development

Develop information technology and advance technology to efficiently manage the operations and services.

# 5. Corporate social responsibility

Support the organization to be responsible for society and not to cause pollution to the environment.

### **Principles**

To determine operational guides of management and employees so that they follow the business code of conduct with honesty and equitability, operate the business with care by having expertise management and employee who could perform their duties effectively and efficiently, comply with the rules and regulations, as well as manage all conflicts of interest that may emerge through the operations. Also, encourage all types of anti-corruption to achieve the corporate mission statement.

### **Corporate Social Responsibility**

The Company determines business vision and mission relating to the corporate social responsibility which is the main Company's strategy for guiding the Company to conduct the business with responsibilities to all related parties, including shareholders, employees, customers, suppliers and creditors, as well as environment, society and community neighboring the Company's properties. In order to share the same accurate understanding, the Company therefore determines guidelines and principles that should be followed when working with related parties as follows.

# **Responsibilities to Shareholders**

1. To manage the Company to be a qualified organization adhering to correctness as well as building sustainable strengths and growths for the shareholders in the long run.

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- 2. To perform a duty with capability and care as a reasonable businessman should do in the same situation.
- 3. To perform a duty with honesty and equitability towards both major and minor shareholders and also for the benefits of overall related parties.
- To ensure that the Company's properties are not devalued or lost without any benefits in return.
- 5. To consistently, accurately and correctly report statuses and operating results of the Company on the actual basis.
- 6. Not to unlawfully disclose the Company's confidential information to others.
- 7. Not to perform any activity that may cause conflict of interest with the Company without giving a notice to the Company.
- 8. To respect the rights and equality of every shareholder—those who are executives and who are not as well as foreign shareholders—and to treat them equally.

# Responsibilities to Employees

- To determine appropriate remuneration structures correlating to the market rates, knowledge, capability, responsibility and behavior through evaluation process by having the supervisor s evaluate their subordinates.
- 2. To improve and provide good welfare and other proper benefits, such as life insurance and accident insurance, health insurance, annual medical check-up, and medical care financial amount for employees' parents.
- To create an understanding about the goals, roles and responsibilities as well as to offer a reasonable opportunity of the career advancement, acceptance and recognition as a result of the work performed.
- 4. To reward and punish employees on the basis of accuracy and honesty.
- 5. To make sure the work environment is safe for life, health, and properties as well as serves the employees' working conditions. The Company shall protect its employees from all forms of discrimination, bullying and harassment (including both sexual and non-sexual harassment) as prescribed at Human Rights policy of the Company.
- 6. To provide clear and efficient working systems allowing employees to use their knowledge and capability, to encourage learning and development, as well as to offer and emphasize the employees' participation.
- 7. To announce the business ethics guidelines for the employees to be well aware to ensure that they understand and follow the guidelines thoroughly.
- 8. To comply with the rules and regulations related to the Labour Law and the employee welfare.
- 9. To avoid any unfair and incorrect actions that affects the career advancement and security as well as to respect every personal right.

### **Responsibilities to Customers**

- 1. To determine fair and appropriate pricing policy.
- 2. In the consideration of trade conditions and business negotiations, no transaction is specially treated. All transactions are treated on the Arm's Length Basis.
- 3. To provide and improve appropriate service systems and to facilitate related processes, including inspecting and providing information, in order to create convenience, promptness, economy and to comply with the trade conditions.
- 4. To prepare fair agreements with customers (so that the customers do not lose the benefits or have trading disadvantages).
- 5. To disclose related and beneficial information straightforwardly, accurately, completely, timely and precisely.

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- 6. To keep customers' confidential information as if it was the Company's confidential information and not to use such information for the Company's or companions' benefits.
- 7. Not to call for, not to accept, or not to give any benefits that are not honest to the customers.

# **Responsibilities to Suppliers and Creditors**

- To give an opportunity for fair trade competition by determining appropriate methods of purchase, hire of work and hire of service, focusing on the transparency and efficiency the methods are price negotiation method, price survey method, offering of competing bid and special method. And surveys of the bidding are conducted in order for the Company to consistently improve the processes of purchasing, hiring of work and hiring of services.
- 2. Not to specify products or try to select characteristics that tend to match any specific products intentionally, except that there are enough supporting reasons. In case of changing products or product characteristics, the Company shall inform suppliers/business partners. If a new proposal is required, the former bidders/ suppliers should equally get an opportunity to resubmit the quotation.
- 3. To select good bidders who are actually interested in the bidding and not to invite any bidders to join the bidding just to have sufficient bidders according to the regulations. Every bidder must receive the same detail, information and conditions in writing. In case verbal notice occurs, the notice must be given in writing later.
- 4. Management or employees who are involved in purchasing, hiring of work and hiring of services must disclose information or personal relationship characteristics of theirs, their spouses, closed relatives or personal relationship with a particular bidder/ supplier that causes non-transparency in direct operations, as well as take responsibility for such incident by not participating in the arbitration process.
- 5. Not to call for, not to accept gifts, giving or entertainments, except for receiving those on the usual tradition and custom. And to avoid giving special treatments that may cause others to question about the fairness, especially when causing other bidders/ suppliers to misunderstand and not to participate the bidding. Even worse, they might talk about the misunderstanding with others cajusing the Company a bad reputation.
- 6. To prepare fair agreements and follow all agreements having with the suppliers and creditors. In case expecting otherwise, the Company shall immediately negotiate with suppliers/ creditors in order to find the methods to prevent and protect any damages that may occur.
- 7. To avoid any action that helps the business partners/ suppliers not pay taxes which should be paid to the government.
- 8. To disclose related and beneficial information straightforwardly, accurately, completely, timely and precisely.

### **Responsibilities to Competitors**

The Company supports and promotes free and fair-trade competition policy by operating business in compliance with fair trade competition regulations and avoiding unfair competition to make a damage the competitors. None of illegal agreements with competitors or other business operators which are a monopoly or reduce competition in the market. The Company will not proceed any treatment in order to cause market price distortion which causes negative effects to service users.



# **Responsibilities to Social and Environment**

- The Company clearly determines policies related to society, community and environment, as well as has a plan for environment inspection at the Company's locations annually.
- To repay the society and community as well as to instill a sense of responsibility to community and society in employees, the Company schedules activities for the employees to do for society at least twice a year.
- 3. To control that the rules and regulations announced by the Internal Control are strictly followed.
- 4. Compliance and Receiving Complaints with Corporate Governance and Code of Conduct

# Other policies to relate or align with Code of Conduct

The Company focuses on the importance of honest, accurate, fair and transparent business operation by strictly complying with the laws, regulations and rules, therefore the Company's policies and its treatments relating to the Code of Conduct have been released and disclosed on website at <a href="https://www.namyongterminal.com/sustainability/cg\_principles/policy">www.namyongterminal.com/sustainability/cg\_principles/policy</a> for comply with Anti-Corruption Policy, Whistle blowing policy, Confidentiality of information, Protection of information and Insider trading Policy, Occupational Safety, Health and Environment policy, Human rights policy, Acceptable Use Policy etc.

In addition, this is to ensure that directors, executives and employees of the Company will operate in the same direction. Therefore, the Company specifies that the directors, executives and employees shall comply with any policies and Code of Conduct of the Company which prohibit directors, executives and employees of the Company from being involved, whether direct or indirect, with all types of corruption. Any violation shall be deemed as serious breach of discipline, which shall be subject to punishment in accordance with the regulation of the Company and shall be liable under the law if such action is illegal.