

CODE OF CONDUCT FOR US



AUTO CS ENGINEERING

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1. President's Message

We are dedicated to Thailand 's automotive industry, we established and began operation in the year 1996 as a prime manufacturer of welding equipment. Now we also export to different countries and in addition to that we serve equipment and tooling to other industries.

The company's philosophy is "We dedicate to society through employee happiness". Employees maintain their wellness in both physical and mental health, while doing their work proudly, they make their families happy and make customers feel they can rely on our work.

Our slogan is "We will go beyond Japan with everyone 's wisdom and devising". Japan is a standard model; we prepare ourselves to technology ideas and present them to customers to fulfill their needs and expectations. In order to achieve this, we rely completely on our people, provide unlimited opportunities to develop their skill and knowledge. We urge them to work abroad with customers. We are prepared and motivated to become the global equipment maker which has Thailand as our manufacturing base. We challenge future changes and become the strongest leader among equipment makers.

Sojiro Kono
President
2018-Current

2. Toyota's Guiding Principles and Values

- 1) Honor the language and spirit of the law of every nation and undertake open and fair corporate activities to be a good corporate citizen of the world.
- 2) Respect the culture and customs of every nation and contribute to economic and social development through corporate activities in the communities.
- 3) Dedicate ourselves to providing clean and safe products and to enhancing the quality of life everywhere through corporate activities in the communities.
- 4) Create and develop advanced technologies and provide outstanding products and services that fulfill the needs of customers worldwide.
- 5) Foster a corporate culture that enhances individual creativity and teamwork value, while honoring mutual trust and respect between labor and management.
- 6) Pursue growth in harmony with the global community through innovative management.
- 7) Work with Business Partners in research and creation to achieve stable, long-term growth and mutual benefits, while keeping ACSE open to new partnerships.

3. Our Shared Responsibility

Auto CS Engineering Company Limited's ("ACSE") daily business operations are built on and supported by Toyota's Guiding Principles. Toyota's Guiding Principles summarize the corporate philosophy that reflects ACSE's vision and what kind of company ACSE wants to be. ACSE's Guiding principle, paired with ACSE's Code of Conduct serves as guidance for daily business operations, for Employees on acceptable and unacceptable practices and to encourage Employees to behave ethically.

This Code of Conduct applies to all ACSE Employees. Following the Code of Conduct enables ACSE to make good decisions, effectively protect the Company's reputation and build a positive environment in which everyone cares about going above and beyond. The Code of Conduct helps ACSE determine the right thing to do, especially when rules are absent or unclear. This Code of Conduct integrates ACSE's Guiding Principles and values providing practical guidance for navigating areas of ethical or legal risk.

The Code of Conduct is ACSE's outline to living the Toyota Way principles, acting in a manner that allows Employees to successfully serve ACSE's customers and achieve ACSE's goals the right way. ACSE Employees must:

- Honor the language and spirit of the law of every nation;
- Undertake open and fair business activities to be a good corporate citizen of the world; and
- Foster a corporate culture that enhances both individual creativity and the value of teamwork, while honoring mutual trust and respect between labor and management.

The Code of Conduct should be openly communicated to ACSE Employees, Business Partners and all other External Parties who do business with ACSE.

3.1 Special Responsibilities for Leaders and Supervisors: While every ACSE Employee shares the responsibility to uphold the tenets shared in this Code of Conduct, those who lead others have a particular opportunity and duty to set an example and proactively shape an ethical culture. This means that leadership must:

- Demonstrate ethical leadership and inspire others to do the same;
- Recognize and reward acts of ethical leadership and acknowledge how these acts drive business success;
- Discuss the Code of Conduct and the values during team meetings and throughout the performance review process;
- Lead by example by promptly completing any required training; and
- Confirm ACSE Employees are aware of the different ways to report concerns and understand that retaliation will not be tolerated.

4. *Speak-up Culture*

ACSE takes violations of the Code of Conduct very seriously. Each ACSE Employee has an obligation to truthfully report any workplace misconduct so that the Company can investigate properly, thoroughly and objectively. During these investigations, ACSE Employees are expected to cooperate fully, while being truthful and forthcoming. If the results of an investigation warrant action, ACSE will take appropriate steps to prevent similar problems from reoccurring.

ACSE Employees are encouraged to talk to supervisors, Human Resources or the Compliance Unit but recognize that there may be times when other channels are needed. For that reason, ACSE offers the ACSE Speak-up program. The ACSE Speak-up program allows ACSE Employees to raise questions or concerns. ACSE Employees may choose to provide their contact information or report anonymously. ACSE Employees can ask a question or report a concern by the following channel options:

Internal channels:

- I. Phone: 081-174-3390 (General Manager - Khun Vanda, Administration Division), 089-244-7531 (Executive Officer – Khun Miki, Administration Division), +81-55-996-2172 (TMEJ Accounting Department, Relevance Company Group – Mr. Tomohiro)
- II. Email: miki@auto-cs.co.th
- III. In Person: Executive Officer (Khun Miki) or General Manager of Administration Division (Khun Vanda)

External channels (by PWC)

- I. Phone: 02-344-1182 (Mr. Saga)

All ACSE Employees who report a concern in good faith will be protected from retaliation, even if the concern is not substantiated. The steps taken in an investigation will vary depending on the nature of the allegations. At times, requests for additional information may be made to the reporter if follow up information is required. In an effort to ensure similar problems are reduced, ACSE will take appropriate action if the result of an investigation warrants it. While complete confidentiality cannot be guaranteed, ACSE limits disclosure of information related to an investigation to individuals who have a legitimate reason to know the specific information. *Refer to the Speak-up Policy for more details.*

5. *Non-Retaliation and Protection*

All ACSE Employees can report violations of the Code of Conduct in confidence without risk of reprisal. ACSE does not discipline, discriminate against, or retaliate against any ACSE Employee who reports incidents of misconduct in good faith or who cooperates in any investigation or inquiry regarding such conduct. Retaliation against anyone for making a good faith report or cooperating in an investigation is not tolerated and is considered a violation of this Code of Conduct.

However, making a report that is intentionally false is contrary to ACSE's values and will result in appropriate disciplinary action. *Refer to the Non-retaliation Policy for more details.*

6. *Disciplinary Action*

ACSE's Business Partners and customers partner to meet performance expectations and demonstrate ACSE's competencies each day. ACSE's high performing Employees are what make ACSE a great Company. Each ACSE Employee is responsible for meeting all performance, attendance and ethical expectations. If a ACSE Employee should fall short of this expectation, ACSE has tools for improvement. Performance, attendance and ethics, which includes behavioral issues, may be addressed in a variety of ways, including oral reprimands, written warnings, unpaid suspensions of no more than seven days, demotions, expulsions, exclusion from raises or bonuses, or termination without compensation. Additionally, in the case of expulsion or termination without compensation, the Company may consider not making pension payment to the Employee.

The Company will determine the most appropriate action based on the circumstances. In some instances, employment may be terminated without previous warnings. ACSE will make compensation payment to a

terminated Employee at no less than the rate prescribed by law, if the employee is entitled to compensation according to the law.

Refer to the Working Regulations for further information.

7. Compliance with Laws, Regulations and Standards

7.1 Good Corporate Citizen: As a good citizen of Thailand, ACSE complies with the letter and spirit of laws and regulations everywhere ACSE does business. As a responsible corporate citizen of Thailand, ACSE's most basic obligation is to do no harm and to follow the laws and regulations that apply to the Company. Employees should also remember that just because something is legal, does not mean it is ethical. ACSE Employees:

- Keep informed and seek advice where necessary about the laws and regulations that apply in our areas of responsibility;
- Get advice from the Administration Division or raise a concern via the Speak-up program if there appears to be any inconsistency between this Code or a company policy and the local law;
- Raise any potential violations or requests to violate to the Speak-up channels; and
- Make decisions and engage in actions that are consistent with ACSE's values even if the action may be in the best interest of the company.

Guidance

Q1: A fellow employee is researching a product defect and fails to put on the appropriate safety equipment to enter your area. What should you do?

A1: Notify the employee that they must wear the appropriate safety equipment in this area. If the employee ignores or refuses the request, report the incident to your superior immediately.

7.2 Accurate Books and Records: ACSE creates and maintains business records with accuracy and integrity. Keeping complete and accurate records helps ACSE to operate more efficiently, reduce business risk, document ACSE's rigorous product testing, comply with regulations and make responsible business decisions. As ACSE Employees we:

- Keep records that honestly and accurately reflect financial transactions, operating procedures (i.e., testing and results) and other matters on which ACSE or others may need to rely;
- Comply with Thai Generally Accepted Accounting Principles, internal financial controls and all related legal and financial obligations;
- Record all assets, liabilities, revenues and expenses completely, accurately, in the proper period and in a timely manner;
- Identify, classify and retain all official records, regardless of format;
- Keep records in a secure and organized environment, so they can easily be retrieved;
- Submit expense reports, time records and sales invoices promptly and within the required timeframes.
- Record all time worked if Employee is overtime eligible;
- Make disclosures to internal and external auditors or regulators that are accurate, timely and complete;
- Comply fully with all litigation hold orders;
- Destroy stored paper records and electronic files once the retention period expires, not before, using approved disposal methods; and
- Raise any concerns about false, misleading or inaccurate records.

Guidance

Q2: As a member of management you are not required to record your in/out working time. What should you do if you come to work late or are absent?

A2: As a member of management you are held to a higher standard and are expected to be a role model for others. In this situation, you must submit a leave application to your supervisor for

approval in compliance with the Working Regulation, Section 3 & 7 about the the Company's Working Hours and asking for absence. These rules apply to all levels of ACSE Employees without exception.

8. Respect for Human Rights and Liberty

8.1 Privacy: ACSE protects personal information. At work, as in personal lives, Employees have a right to expect that their personal information will be kept confidential and secure. If a position requires a legitimate need to access, use or share other's personal data, it must be done with the utmost care. ACSE Employees:

- Follow all applicable privacy laws and company privacy procedures and practices;
- Collect, use, and process personal information only for legitimate business purposes; and
- Protect the privacy and security of information entrusted to us.

Guidance

Q3: As part of your job function you handle personal data of employees. You are requested to send an employee's data to another individual, what steps do you take?

A3: Clarify with the requester if the need is a legitimate business need. If it is a legitimate business need, you must prevent leakage of the data by sending the information via encrypted email or send the data directly in a sealed envelope with a CONFIDENTIAL stamp. If you have any questions or concerns about transferring the data or the need for the data, escalate to your superior for additional guidance before sharing the information / data.

Q4: As part of your job function you request personal data of employees. When there is no longer a legitimate business need to have the personal data, what should you do with the data?

A4: Destroy it or send it back to the sender. Avoid making copies. The data needs to be kept in a secured location with measures to prevent access from others.

8.2 Equal Treatment: ACSE respects and protects human rights. ACSE believes that every individual has the right to be treated with dignity. ACSE will not discriminate against anyone due to their race, religion, gender, age, color, education, social status or physical or mental condition. ACSE supports the protection of human rights in business operations, supply chain and communities. ACSE Employees:

- Provide proper working conditions to all ACSE Employees that are free from harassment or unfair treatment;
- Treat everyone with respect and honor;
- Treat others fairly without considering physical and mental characteristics, nationality, religion, gender, age, color, education, social status or any other factors;
- Conduct job functions correctly and fairly (e.g. recruitment, remuneration payment, working hours, job holidays, assignments, performance appraisals, training, development, etc.);
- Work only with suppliers and other Business Partners who are committed to fair labor and sustainable sourcing practices that protect the health and wellbeing of workers and communities;
- Never use child or forced prison labor; and
- Refuse to look the other way when Employee sees or suspects human rights violations, and alert the Company.

Guidance

Q5: You are assigned to work with employees in another department that are different in race, nationality, gender, language, age, appearance, education or social status, what should you do?

A5: Treat them equally and fairly.

Q6: As a supervisor you have to do a performance appraisal on an employee who you have a personal conflict with, what should you do?

A6: You must treat every employee fairly without discrimination. You must avoid any action that is unreasonable. The appraisal must be based on the employees competence and performance that is free from personal judgment, bias or prejudice.

8.3 Discrimination or Harassment: ACSE values its Employees. ACSE is committed to maintaining a diverse and inclusive workplace where everyone is inspired to do their best work. At ACSE, Employees make every

effort to understand each other, and build mutual trust. As Employees speak up openly and honestly and report any concerns quickly so that they can be resolved. This creates a collaborative work environment to better innovate for ACSE's customers.

ACSE Employees are each accountable in creating a working environment of trust and dignity. Employees work as a team to succeed together. Each of us has a responsibility to speak openly and honestly to help each other to be successful in ACSE's jobs

ACSE values Employee's experience and opinions and provides opportunities to develop personally and professionally. ACSE recognizes that diversity of experience, background, and perspective helps the Company overcome challenges, solve problems and innovate. Diversity promotes kaizen and makes the work environment more productive. ACSE Employees:

- Listen to everyone's ideas so an Employee can consider and benefit from thoughts and opinions that are different;
- Treat people fairly and provide Employees with equal opportunities, based on their qualifications and skills;
- Ask for and are receptive to feedback from others;
- Do not discriminate based on protected characteristics in hiring, assigning work, promoting or other aspects of employment;
- Work together collaboratively, providing help when needed;
- Do not tolerate behavior that could make others feel threatened or intimidated;
- Do not tolerate harassment or bullying, whether it's what someone says, does or posts online;
- Report offensive jokes, insults, or other comments about race, gender, color, religion or other characteristics protected by law;
- Do not make unwelcome sexual remarks or advances, or display sexually explicit material that others could find offensive; and
- Report any threatening, intimidating, or unethical behavior, whether it targets us or someone else to Human Resources.

Guidance

Q7: You are working as part of a team and everyone is suggesting different ideas to solve an issue. You disagree with a person's idea, what should you do?

A7: You must respect other individual's ideas. Do not overtly disagree or use sarcasm. You may explain your own view point rationally.

Q8: A fellow employee has a habit of touching other employees, both male and female (e.g. patting on the head, shoulder, waist or thigh with the objective to greet, tease, console, or show sympathy).

A8: You must report this situation to your Supervisor and/or to the Speak-up Line.

8.4 Politics and Religion: ACSE encourages active participation in the political process. As a company, ACSE engages constructively with all governments in the regions in which it operates. By encouraging active participation in the political process, ACSE can make a positive difference in the communities it serves. As ACSE Employees we:

- Represent the Employee in an individual capacity, without reference to a position or title with ACSE;
- Seek the approval of the Administration Division when participating in the political process on behalf of ACSE;
- Do not impede the political rights of another person, e.g. exercising the right to vote in an election;
- Do not incite, encourage or force any subordinates to support a politician or political party;
- Do not obstruct the beliefs and profession of religion or religious rites;
- Avoid sharing opinions on politics or religion that may lead to conflict; and
- Do not donate money on behalf of ACSE to any Government Official, political party or official or candidate for public office.

Guidance

Q9: You have been invited to be a consultant of a parliament commission, can you accept it?

A9: Yes. Giving advice is your political right. You must clarify that your viewpoint is your own and that you are not giving advice on behalf of ACSE. The consultation can not be a regular job and must not affect your work at ACSE. You must report in advance to your superior before accepting the invitation.

Q10: If your subordinate notifies you that they are applying as a candidate for the sub-district administration organization (“SAO”) in the upcoming election, how do you handle this?

A10: Explain to the Employee that they can apply as a candidate in the election as long as it does not interfere with their normal working hours, they can not claim employment with ACSE as an advantage in the election or canvassing and they can not claim or mislead the public that ACSE supports, is involved or backs a specific political group or candidate. If the Employee is elected as a SAO member, they can not utilize their normal working hours to complete SAO duties. Any conflict of interests with the Company is prohibited.

9. Safety, Health and Environment

9.1 Safety and Health: ACSE strives to keep all Employees safe and treats safety as a priority. ACSE maintains a safe work environment for all Employees, Business Partners and visitors. For everyone’s protection, safety concerns must be communicated in a timely manner. As ACSE Employees we:

- Prioritize safety as Employees plan and carry out work;
- Follow safe practices and procedures and abide by laws, regulations, and policies;
- Report any unsafe conditions, near misses, injuries or illnesses that could impact workplace safety immediately;
- Work free from the influence of alcohol or drugs that affect Employee safety; and
- Keep current on Employee safety training and comply with safety requirements per the Employee Safety Manual.

Guidance

Q11: A fellow Employee does not always wear personal protection equipment (“PPE”) because they feel it is uncomfortable and believes an accident is a matter of fate. What should you do?

A11: You should remind them to always wear their PPE every time because it is policy and that not doing so adds to and increases the chance for likelihood of an accident occurring. If they choose not to wear the PPE, escalate the situation to your supervisor. *Refer to the Employee Safety Manual for further guidance on PPE.*

Q12: A fellow Employee has injured their back, sought medical attention and was informed by a medical professional that it may have been caused by a working condition. As his supervisor, what should you do?

A12: As a supervisor, evaluate the job and observe the working conditions and the Employee’s posture (e.g., lifting too heavy items, sitting position is unsuitable, height of working item is improper, etc) to discover the root cause and develop countermeasures items.

Q13: Several fellow Employees are out sick today. We are having a hard time staffing all positions. There is an Employee who can drive a forklift, but they have not completed the required training. Can we move them to that position just for the day, so we can get the work done?

A13: No. Employees cannot operate equipment without completing ACSE’s required training. Moving someone to a role without training would violate safety regulations and our policies and could cause risk of injury or damage.

9.2 Environmental: ACSE recognizes the importance of operating in a sustainable manner and is dedicated to minimizing the environmental impact of ACSE business operations, including manufacturing, distribution, research and development, and ACSE products. ACSE wants to reduce ACSE’s environmental footprint and to contribute to society by sharing ACSE’s innovations so that all can benefit. As ACSE Employees we:

- Comply with all applicable environmental laws, regulations and policies;
- Apply kaizen in pursuit of excellence in sustainable business practices;

- Push toward a net positive environment by developing an Environment Operation Plan that push us toward the successful implementation of the 2050 Environmental Challenge;
- Follow protocols at all facilities to help ensure that ACSE's environmental goals and objectives are achieved annually (e.g. reduce, re-use or recycle);
- Foster environmental awareness and practices with ACSE's Business Partners and never ignore complaints from the community; and
- Take practical steps every day to conserve energy, water and other resources and cut emissions.

Guidance

Q14: You are investigating replacing a supplier of a current product with a new supplier. The new suppliers product is the same quality as our old and has a lower price. The only issue is that the new supplier does not comply with ACSE's environmental standards. Should I switch the supplier to save the company money?

A14: No, since ACSE encourages its Business Partners to practice conservation of the environment and to comply with all laws and regulations, you should avoid contracting the new supplier, even if it comes at a lower cost. Also you should encourage the new supplier to offer it again after they meet the required environmental standards.

9.3 Product Safety: ACSE prioritizes safety and quality in the development, manufacture and support of all ACSE products. Every day, each of us helps bring to life ACSE's vision of enriching lives with the safest and most responsible ways of moving people. This demands continual focus on meeting the quality standards ACSE set for the design, development, production and testing of ACSE products, supporting safety and quality requirements, and constantly seeking ways to improve. As ACSE Employees we:

- Follow all standards and procedures designed to ensure product quality and safety, never cutting corners or looking for shortcuts;
- Recognize that ACSE's brand and reputation rests on every single decision and actions of Employees concerning product quality or safety issues;
- Take personal responsibility for keeping ACSE customers and their families safe by reporting any concerns about product quality or safety; and
- Promptly address concerns about product quality or safety.

Guidance

Q15: In my work area I noticed a shipment of parts that look very different from prior shipments, and I am concerned there is a problem. What should I do?

A15: It is every Employee's responsibility to raise awareness and pull the product if you detect an abnormality, even if you are unsure. Each of us can make a difference when ensuring the quality and safety of our products.

10. Receiving or Giving Benefits

ACSE offers and receives only appropriate gifts and hospitality and believes in building strong business relationships for the long term. ACSE understands that appropriate gifts and hospitality can promote goodwill, but Employees should never offer or accept anything to influence a business decision. Special rules apply to things of value provided to Government Officials, and preapproval is required before these items can be given or promised. *Refer to ACSE's Gifts and Hospitality Policy for additional details.* As ACSE Employees we:

- Offer gifts or hospitality only when it is
 - For a legitimate purpose (such as hospitality connected with a site visit or a customary seasonal gift);
 - Permitted by ACSE's policies and the recipient's policies (if known);
 - In compliance with local and related international laws (contact the Compliance Unit or Administration Division if Employee is unsure);
 - Reasonable in value and appropriate under the circumstances; and
 - Accurately accounted for in ACSE books and records;
- Never request gifts from suppliers or service providers;

- Politely refuse gifts from suppliers or vendors that are offered around the time of a procurement decision;
- Do not accept gifts in cash or cash equivalents (i.e. gift cards, gold);
- Do not ignore or overlook any transaction possibly considered as corruption relating to the Company. Employees must report the incident to a superior, Compliance Responsible¹ or the Administration Division and also cooperate during any fact finding investigation, if required;
- Are strictly prohibited from receiving a gift or benefit with unclear origin or reason; and
- Do not allow or direct a Third Party to provide anything of value to another person or entity on ACSE's behalf.

Please consult the Compliance Unit for guidance if Employee has any questions or are unsure about a situation. Also, Employees can review the Gifts and Hospitality Policy, Donations and Sponsorships Policy and the Anti-Bribery and Anti-Corruption Policy for more information.

Guidance

Q16: Are there any specific items I should do when I want to offer gifts or hospitality to Government Officials, high ranking officers, other government employees, or any public organization or a third party agent?

A16: Offering, giving, or accepting gifts and hospitality to or from Government Officials, officers and employees poses significant corruption risk. For that reason, ALL such items must be preapproved before they can be offered or given. Please consult the Compliance Unit and the Administration Division for guidance and see the Gifts and Hospitality Policy, Donations and Sponsorships Policy and the Anti-Bribery and Anti-Corruption Policy for more information.

Q17: During a bid process, a Business Partner is offering a price of THB 30,000 higher than any other supplier. In discussions with this Business Partner they mention the increased THB 30,000 can be provided back to you personally as a kickback if they are awarded the job. Can you accept this?

A17: No. Kickbacks are strictly prohibited. Such actions are fraud, and in addition, it is theft from the Company. Such behavior violates the law and Anti-Bribery and Anti-Corruption Policy and is grounds for significant employment action, up to and including termination as well as dismissal of the business partner and legal action.

Q18: A contractor who works with you learns that you are taking your family on vacation in the up country. The contractor offers you his own resort free of charge because no one normally uses it. Can you accept his offer?

A18: No. You should not accept his offer since it may influence your decision and does not fall into normal entertainment and exceeds the limit allowed under the Gifts and Hospitality Policy.

Q19: You are attending a company paid conference and there is a raffle for the participants and you are drawn and win a prize. Can you keep the prize for yourself?

A19: Yes, if the prize is won from a lucky draw raffle and is won with transparency, the other conference participants are also eligible and the prize does not influence your decision making. If the prize is of excessive value, you must notify your supervisor and the Administration Division for further guidance and to confirm the giving is not intended to motivate upcoming business decisions.

11. Conflict of Interest

ACSE acts with integrity and keep promises. Doing the right thing and following through on commitments is central to how ACSE operates. When going to market, ACSE is not just selling products, it is making a promise to better the lives of millions of consumers through safety and satisfaction. ACSE's reputation depends on acting with integrity and keeping that promise every day, every step of the way.

Employees must disclose when there is a potential conflict of interest. Acting with integrity means doing what is right and not allowing personal interests or relationships to interfere with what is best for ACSE. Even the appearance of a conflict of interest could make others doubt ACSE's integrity, harming trust and ACSE's ability to deliver on promises. ACSE must therefore always be alert to the possibility of conflicts of interest, and especially when it comes to:

¹ The Executive Officer, Administration Division, is the Compliance Responsible for ACSE

- Outside employment with a customer, supplier, or competitor
- Personal or close familial relationships
- Financial interests
- Romantic relationships
- Gifts and hospitality

As ACSE Employees we:

- Give the best effort every day at ACSE, not performing outside employment, community service or other activities during work time;
- Ensure that Employee personal investments and those of close relatives do not create a conflict of interest;
- Maintain good judgement and avoid bias by disclosing personal relationships with other Employees;
- Don't influence hiring, performance evaluations, or promotion decisions regarding covered personal relationships;
- Ensure transparency and independence when close friends or relatives are being considered as potential Business Partners;
- Do not do business or be a shareholder with decision making power in a business that competes with the Company;
- Only give and receive gifts or hospitality that are appropriate and reasonable in value;
- Only offer gifts and hospitality that are appropriate and reasonable in value to Government Officials in accordance with law and policy;
- Acknowledge that opportunities and discoveries that are made during the course of employment, while using company property, are intellectual property, are owned by and used to better the Company.

Guidance

Q20: You are responsible for ordering office supplies and you have a relative that owns an office supply distributor who has offered you a discount. Can you purchase office supplies from your relative?

A20: No. You cannot directly procure the products nor can you be involved in that procurement process. Procurement and approval by the same person can cause doubts about fairness. You must disclose the relationship properly. The Company can assign another Employee to conduct the bid and negotiate the ongoing transactions but all purchase transactions must be clear and transparent.

Q21: A close friend asks your help in introducing their company as a potential Business Partner to ACSE. Can you do it?

A21: Anyone suggesting a potential Business Partner to ACSE should only do so based on the Business Partner's potential and in the best interest of the Company. You must be clear and transparent in your relationship with the Business Partner. If you are involved in the selection process for the friend's company, you must withdraw from the process to avoid conflicts of interest.

Q22: Your brother owns a contracting company that does business with ACSE. Your brother passes away and you are now responsible for business. What should you do?

A22: You must notify management and the Administrative Division to discuss the situation. In most cases you cannot work as an Employee of ACSE and at the same time be a Business Partner.

12. Anti-Fraud

Fraud of any kind is strictly prohibited. ACSE does not tolerate any form of fraudulent activities. This includes any type of intentional, deceptive act that can result in a misstatement in the financial statements for personal gain.

Fraud may include, but is not limited to:

- Impropriety in the handling or reporting of money or financial transactions;
- Profiteering as a result of insider knowledge of company activities;
- Disclosing confidential and proprietary information to outside parties;
- Overstating or inaccurately describing services or goods that the Company receives from a third party;

- Accepting or seeking anything of material value from contractors, vendors, or persons providing services/materials to the Company (*Refer to Anti-Bribery and Anti-Corruption Policy for further details*);
- Destruction, removal, or inappropriate use of records, furniture, fixtures, and equipment;
- Payment of anything of value to public officials or other third parties with the intent of obtaining or retaining business; and
- Any other dishonest or deceptive act.

Every ACSE Employee has an important role in making sure that the Company's books records, and accounts, (journals, ledger sheets and account ledgers, etc.) are accurate and transactions are properly accounted for and supported by proper documentation. Submission of falsified receipts or other documentation is grounds for discipline or termination. ACSE Employees must not, in the course of business for or in connection with ACSE, conduct off-the-book, fictitious or otherwise falsified transactions, or any other similar acts prone to be misconstrued as such. ACSE Employees must never hide or purposefully misclassify expenses. Each Employee is responsible for ensuring that ACSE's internal controls are effective and consistently enforced.

The Administration Division leads the risk assessment process to identify any fraud risks and provide support in performing the fraud risk assessment in order to reduce fraud opportunities to an acceptable level. All ACSE Employees should assist the company with this process.

The Administration Division on an ongoing basis oversees and monitors the administration and interpretation of any other activities related to the Anti-Fraud provisions and implementation of any improvements where needed. The Administration Division performs compliance-focused audits (either with internal audit or outside resources) to check for fraud. All ACSE Employees should support the internal audit process through providing requested documentation and other asks made by the Administration Division during the audit process.

ACSE will protect and provide fair treatment to Employees who refuse to be involved with fraudulent acts or who report any fraudulent activities in good faith, as well as provide protection to whistleblowers/reporters subject to the law. Anyone who retaliates against a ACSE Employee who reports a suspected fraud may be subject to corrective action, up to and including termination. *Refer to the Non-Retaliation Policy for further information.*

The Company does not consider conduct in violation of this Code of Conduct to be within the scope of a ACSE Employee's job duties, and such conduct may subject the ACSE Employee to criminal and civil penalties, including fines and, in some cases, imprisonment. Violators, and those who have knowledge of incidents which they fail to report, may also be subject to appropriate disciplinary action.

ACSE Executives, Management, and Supervisors, at all levels, are accountable for the actions of their subordinates in cases where the superior knew or should reasonably have known that a subordinate was either involved in fraud or had refrained from performing duties that would have helped ACSE to detect fraud occurrences.

ACSE Employees:

- Are transparent, ethical, and accountable for their own work and actions;
- Do not tolerate any form of fraudulent activities by any Employee, suppliers, vendor, Third Party, or any party which ACSE conducts business;
- Speak up and report any suspicions of any fraudulent activities by any Employee, supplier, vendor, Third Party, or any party which ACSE conducts business to Human Resource and/or the Compliance or via a Speak-up channel; and
- Contribute to an overall ethical environment and Speak-up culture.

Guidance

Q23: How can you ensure ACSE growth and still comply with ACSE's anti-fraud policies, Thai laws, and the ACSE Code of Conduct?

A23: Communicate ACSE’s ethical standards to internal and external stakeholders. Prior to engaging Business Partners, consult with Purchasing to ensure appropriate due diligence of the vendor has occurred. Incorporate contractual safeguards into agreements and educate your Business Partners or vendors on applicable anti-fraud and corruption compliance.

Q24: A third party offers to give your son a job in their company, but makes it clear that in return they expect to be awarded an upcoming tender. The third party was going to be awarded the tender anyway. Can your son accept the position?

A24: Acceptance is prohibited under this Policy and you must escalate the offer to the Administration Division.

Q25: Who should I contact with questions or concerns regarding anti-fraud compliance?

A25: Questions or concerns regarding anti-fraud compliance should be directed to Compliance or Human Resource.

13. Anti-Corruption

ACSE stands against corruption and builds business and relationships on the basis of trust, transparency and integrity. ACSE does not engage in bribery or other corrupt practices – ever. It’s illegal and it’s not how ACSE operates. ACSE believes in the quality of ACSE products and the value of ACSE partnerships. ACSE would rather lose business than pay a bribe to win it. As ACSE Employees we:

- Never offer, provide or accept anything of value in exchange for business or to gain an improper advantage over ACSE competitors;
- Keep books and records that fully and accurately describe all payments, expenses and assets;
- Conduct appropriate due diligence on ACSE vendor, suppliers and service providers, as required; and
- Never ask third parties to engage in activities ACSE would not be comfortable engaging in, such as unlawful or unethical activities.

Guidance

Q26: During the selection of suppliers, one of the suppliers is offering to provide you cash and the newest model mobile phone if you agree to choose to procure product or services from their company. What should you do?

A26: You must refuse the offer and immediately escalate the offer to the Administration Division and your supervisor to be address appropriately. Offering a bribe is illegal and a violation of ACSE’s Anti-Bribery and Anti-Corruption Policy. The Company must refrain from making transactions with any supplier that exhibits fraudulent behavior or offers bribes.

Q27: Our facility is awaiting a delayed parts shipment from an overseas supplier. Our freight forwarder has informed the Company that the delay is the result of an export permit “misunderstanding”, which is holding up the parts in the other country’s customs. The agent tells you that it can take care of the situation with a relatively small payment. Should you tell the agent to go ahead?

A27: You should seek immediate assistance from your manager and inform the Administration Division and Compliance Unit. We do not have full information about the situation or what the agent has in mind. Nevertheless, the priority is to ensure that the agent does not offer or pay a bribe or do anything which could be misinterpreted as a corrupt practice. ACSE will not engage in corrupt practices nor authorize anyone to do so on our behalf. This is unethical and illegal and could result in serious government enforcement action and reputational risk.

14. Procurement

ACSE selects Business Partners fairly and objectively for mutual benefit while protecting ACSE’s reputation. ACSE depends on a large number of suppliers and other Business Partners. The quality and safety of ACSE products and the efficiency of ACSE production processes demand that ACSE works with the very best partners and select them based on fair and reasonable criteria. ACSE is committed to promote localization to support the country’s automotive industry. As ACSE Employees we:

- Deal fairly and honestly with all business partners, regardless of the value of the transaction or the length of the relationship;

- Select suppliers who best meet ACSE’s business needs and objectives and are mindful of ACSE’s commitment to diversity in the supplier base;
- Base decisions on objective criteria such as quality, price, service, reliability, availability, technical excellence and delivery, as well as ethical business practices;
- Avoid conflicts of interest, or the appearance of them, which could raise a question about ACSE’s ability to exercise independent judgment on ACSE’s behalf; and
- Accept only gifts and entertainment that are appropriate and reasonable in value from Business Partners and disclose them according to policy.

Guidance

Q28: My uncle has a catering business and we are currently planning for an onsite event requiring catering. Can I submit my uncle’s company for consideration as the catering vendor?

A28: It is important to protect ACSE’s interests and to make sure ACSE is getting the best value. Your uncle’s catering company can be considered as a vendor provided that your uncle follows the vendor approval process and your family relationship is properly disclosed. Under no circumstances should you participate in or attempt to influence the vendor selection process.

15. Competition and Antitrust

ACSE competes vigorously and fairly, winning in the marketplace through superior performance and value. ACSE believes that a free and competitive marketplace offers us the best opportunity to differentiate the brand and succeed over the long term. By delivering innovation, value and reliability ACSE outperforms the competition while strengthening customer trust. Violation of the antitrust laws designed to ensure free competition can have serious consequences for the Company and for individuals. Even the appearance of unfairness or deception in ACSE’s competitive practices can directly impact ACSE’s chances of success. As ACSE Employees we:

- Don’t have conversations or make agreements with competitors about:
 - Pricing and costs;
 - Contract terms and conditions;
 - Bids;
 - Markets and territories;
 - Customers and suppliers; and/or
 - Any other matter that could suggest collusion;
- Avoid negative comments about competitors or their products;
- Use only honest, accurate and fact-based language to describe ACSE products;
- Don’t interfere with others’ business contracts; and
- Accept terms and conditions that can be fully and consistently abided by.

Guidance

Q29: Could something violate ACSE’s Antitrust Policy even if it doesn’t violate the law?

A29: Yes it could. If you disclose confidential information to competitors about like pricing, contract terms, products, market share, customers or market plans you are violating the policy even if it is not acted upon.

Q30: Do I have to make a report if a competitor proposes something about pricing or customers?

A30: Yes. Notify the Administration Division and let them know what happened.

16. Use and Management of the Company’s Assets and Information

16.1 ACSE Tangible and Intangible Assets: Employees must be good stewards of ACSE’s assets. ACSE’s assets take many forms: physical assets (such as facilities and equipment); financial assets (such as cash and bank deposits); information assets (including all the data in files and on servers) and intangible assets (such as reputation, ideas, inventions and intellectual property). All Employees have an obligation to protect the Company’s assets because they are critical to ongoing business operations and fuel future innovation and growth. As ACSE Employees we:

- Take care to ensure that assets are not damaged, abused, wasted, lost or stolen;
- Use good judgment in relation to information and communications systems, and the electronic data they store, process or transmit;
- Always handle company funds honestly, responsibly and in accordance with company policies;
- Report any abuse or misuse of company assets, such as burglary, misuse of personal assets for personal gain, damage or loss of property, etc;
- Safeguard company-owned property against removal from ACSE facilities for personal use or by unauthorized individuals; and
- Comply with the regulation regarding “Assets Pass” to prevent asset loss.

Guidance

Q31: If you discover someone has stolen a piece of production scrap (e.g. spotted copper tips, damaged part), what would you do?

A31: Scrap in any form is regarded as a Company asset, even though it is left in a recycle bin. This action would be considered stealing or taking the Company’s asset for private benefit. You should notify your supervisor and the related department immediately.

Q32: You witness a company vehicle being used in an inappropriate way. What should you do?

A32: A company vehicle is regarded as an asset to be used for business purposes only. Witnessing it being utilized in another way; e.g. for private benefit, should be reported immediately to the controllers of the vehicle.

16.2 Confidential Information (Including Intellectual Property): All Employees must protect ACSE’s confidential and proprietary information. ACSE’s confidential business information and ideas, know-how and other intellectual property are vital business assets that differentiate ACSE from its competitors. Each Employee shares the responsibility for keeping these assets secure, preventing them from unauthorized disclosure or misuse. ACSE Employees:

- Share confidential information only with authorized individuals who have a legitimate business need for it;
- Confirm non-disclosure agreements are in place before releasing confidential or proprietary information outside of ACSE;
- Secure documents, data, and devices in accordance with security practices (e.g. encryptions);
- Appropriately dispose of confidential paper documents using secure shred bins;
- Avoid discussing confidential information in public or allowing people to view it on mobile devices;
- Escort visitors within facilities and do not allow them into restricted areas;
- Upon leaving the employment of the Company, an Employee must return all intellectual property and/or trade secrets, work output to the Company, regardless of the forms the data are in;
- Never destroy records before the expiration date of the retention period, and when the period for storage has expired, the Employees responsible should ensure the records are destroyed in the manner appropriate; and
- Report misuse of intellectual property or unauthorized disclosures to the Compliance Unit, Administration Division or via the Speak-up Line.

Guidance

Q33: You witness your fellow Employee sending out confidential information to an outsider without permission. What should you do?

A33: You should notify your supervisor immediately along with the related department. Also, you can report to issue to the Speak-up Line.

Q34: As part of your role, you have access to the bidding documents from Business Partners. Another Business Partner offers to buy the information from you. What should you do?

A34: You should notify your supervisor and Procurement immediately. Such behavior violates ACSE policy and is grounds for significant action. Never send information from one bidder to a competitor. You are responsible for maintaining the confidentiality of the Business Partner’s information. Procurement should terminate the business relationship with the Business Partner that offered to buy the information.

16.3 Technology and Information Systems: ACSE uses technology and information systems responsibly. ACSE's technology and information systems, and the data they store and transmit, are critical to business success. Laptops, telephones, mobile devices and the infrastructure that supports them, help communicate and collaborate more productively so that ACSE can continuously improve and better serve customers. ACSE Employees must use them responsibly to conserve resources, safeguard security and preserve reputation. As ACSE Employees we:

- Take reasonable care of any company equipment issued to an Employee;
- Grant system access only to those who need it to do their jobs and only for so long as it is needed;
- Follow all required data security protocols to prevent unauthorized access to company mobile devices and networks;
- Do not download unapproved software, open unfamiliar email attachments or use unapproved storage media;
- Protect confidential information at all times, ensuring emails are sent only to the intended recipients and never posting confidential information on social media sites;
- Make only limited, infrequent and incidental personal use of company electronic devices (i.e., company phones, internet bandwidth, etc) during worktime;
- Follow local policies related to use of personal electronic devices while on company time.

Guidance

Q35: I have a business activity outside of ACSE. I need a computer to do some work for my other business activity each week. Can I utilize my work computer to do my other business?

A35: A Company computer is regarded as an asset to be used for business purposes only. Utilizing it to conduct a personal business activity is a violation and against Company policy.

16.4 Insider Trading: ACSE safeguards information unavailable to the public from improper disclosure or use. In the course of employment, Employees may acquire non-public information about the plans or condition of ACSE or another company. This "insider" knowledge could provide a financial advantage when used to buy or sell shares of stock. Using this information to trade in securities (or "tipping" others so that they can do so) could be illegal and could result in significant fines and prison sentences. ACSE Employees:

- Keep inside information secure – whether that means locking drawers or keeping laptops and mobile devices protected;
- Do not use inside information to buy or sell securities before that information has been released to the public, and investors have had a chance to evaluate it;
- Share confidential information only with those who need to know; and
- Never disclose inside information to anyone outside the company, including family members, friends and social media communities.

Guidance

Q36: You have access to information about a potential site for new construction related to the plant that has not been revealed to the public. You are thinking of purchasing some land near the proposed site as an investment. Can you do this?

A36: You should not proceed with the purchase as this information is regarded as "insider" information and would be considered an exploitation of that knowledge. You may proceed with purchasing property after the information has been made public knowledge.

17. Use and Management of Other's Assets and Information

17.1 Business Partner Information: ACSE respects and protects others' confidential and proprietary information including intellectual property. ACSE respects the right of customers and Business Partners to keep their confidential information secure, just as ACSE expects the same of others. ACSE understands that the unauthorized copying or use of ideas, know-how or intellectual property belonging to others is never allowed and may create financial and legal liability for ACSE. ACSE Employees:

- Request written permission before disclosing Business Partners' and customers' confidential information;
- Take appropriate measures to secure all confidential information, whether on paper or stored electronically;
- Notify the Administration Division immediately if, inadvertently, an Employee comes into possession of what appears to be another organization's trade secrets or other proprietary information;
- Do not knowingly infringe on others' copyrights, patents, trademarks, trade secrets, names, design rights, logos or know-how;
- Use all Third Party assets – including software, music, videos and text-based content – according to their specific license terms; and
- Seek any necessary permissions from the Administration Division regarding intellectual property.

Guidance

Q37: A former ACSE Employee has reached out asking if you could provide contact information for a few of our current suppliers that they worked with in the past. Can I give them the contact information?

A37: No. We cultivate strong, lasting relationships with our customers, suppliers and vendors, based on integrity and trust. To maintain those relationships we must protect the other party's information. This includes not sharing contact information unless the relevant customer, supplier or vendor has given express consent.

Q38: I'm working on a product development project in collaboration with a new supplier. I have been impressed by what I have learned about the new supplier. I think that knowledge of their systems could be helpful in our collaboration with another supplier on an unrelated product. Can I share the information?

A38: No. It is important to safeguard the information of suppliers. Supplier information should not be shared with other suppliers without the documented consent by the supplier owning the information.

17.2 Competitor Information: ACSE stays ahead of market trends and customer needs by keeping informed. Gathering information appropriately on the industry, customer needs and competitors' value propositions allows ACSE to continuously improve ACSE's products and compete more effectively. However, ACSE never puts its reputation or integrity at risk for competitive information. ACSE treats competitors with the fairness it expects to be treated. ACSE Employees:

- Are truthful about ACSE's identity and motives when making inquiries;
- Don't use Third Parties to engage in action ACSE would not engage in, such as unlawful or unethical activities; and
- Do not request or require Employees (or prospective Employees) to reveal confidential information about their former employers.

Guidance

Q39: Before I joined ACSE last year, I worked for another automotive manufacturer. While there, my team and I had developed a process to enhance the paint application on vehicles. I realized the other day, I have copies of that documented process. Can I utilize those documents to kaizen ACSE's paint application process?

A39: No. While we always encourage Employees to look for ways to improve our processes, it's important that the source of innovation come from within. Information from other companies, including other automotive manufacturers, may be proprietary, and therefore using it could put the company at great legal and ethical risk. If you have questions about any information for use in implementing or changing any ACSE business related processes or operation, please see your supervisor, Human Resources or the Administration Division.

18. Corporate Communication

18.1 Accurate Communications: ACSE takes pride in its brand and promotes its products in a honest and transparent way. ACSE is committed to providing present and future consumers with accurate and truthful information in marketing and advertising to promote informed purchasing decisions and, most importantly, trust in the ACSE brand. ACSE Employees:

- Market products in a manner that is truthful and not misleading;
- Ensure that every claim in ACSE’s advertisements and marketing materials is adequately substantiated as required by law;
- Secure the proper approvals before release of internal or external messaging, including Business Partners creating materials on behalf of ACSE;
- Ensure that emails, social media posts and internet usage do not involve any material that is offensive or illegal; and
- Comply with all laws and regulations.

Guidance

Q40: I know that product reviews in social media are very powerful. I really believe that our products are great. Can I write a comment or review on social media?

A40: While Employees are welcome to talk about the Company on Social Media, they may not represent that they are speaking on behalf of the Company. If you have questions about when or how to appropriately discuss our product in social media, please review the Social Media section of this Code of Conduct.

18.2 Authorized Communications: ACSE is honest and accurate in communications, building trust in ACSE’s brand. ACSE’s commitment to integrity means providing honest, clear information about ACSE. It also means identifying the Employees who are best qualified to represent the Company with a consistent and positive voice, and address any questions or concerns our stakeholders may raise. ACSE Employees:

- Refer any external inquiries to Administration Division to speak on ACSE’s behalf;
- Understand the importance of brand communications and ensure that only the best and most accurate information is communicated and relied on; and
- Use corporate logos accurately and not for personal use.

Guidance

Q41: Yesterday a local reporter called me about a story she is writing on our great products such as welding lines & jigs. She wanted to know about a current project we are working on. I’m not sure what to tell her.

A41: If you receive calls from external parties asking for comments on behalf of ACSE or its products and services, direct them to the Administration Division. We need to be especially cautious about external inquiries that may be an attempt to collect confidential, non-public information.

Q42: I received a call from a government inspector requesting to see files regarding ACSE’s products. I don’t normally interact with government inspectors. What should I do?

A42: Such calls need to be directed to your supervisor and you should contact the Business Division EO or GM immediately. This will help ensure we provide a timely and accurate response.

19. Government Relations

ACSE engages constructively with all governments in the regions in which we operate. It is ACSE’s goal to maintain good associations with the public sector (including the political sector) by building good relationships and operating with transparency and honesty. ACSE will conduct its business with the public sector without motivating company Employees or Government Officials to act inappropriately. ACSE Employees:

- Represent in an individual capacity, without reference to the positions or title with ACSE;
- Seek the approval of Administration when participating in the political process on behalf of ACSE;
- Conduct business or contract with the public sector or a Government Official transparently and in accordance with laws and company policies; and
- Do not make any political contribution on behalf of ACSE to any Government Official, political party or official, or candidate for public office.

Government Official (“GO”): Includes but is not limited to, national, provincial or municipal officials at any level whether in Thailand or abroad and whether operating in their official capacities or not:

- Any current or former national, provincial, local or municipal employee including:
 - A GO or local officer holding a permanent position or salary;

- b. an officer or a person working in a state enterprise or a state agency;
- c. a local administrator, a deputy local administrator, an assistant local administrator or a member of a local council;
- d. an official under the law on local administrative procedures;
- e. directors and employees of state agencies or state enterprises;
- f. a person or a group of persons who exercise power or are entrusted to exercise state administrative power under the law.
- g. an officer or a person working in government universities, hospitals, or other government institutions;
- h. an officer or a person working in independent public agencies and public organizations; and
- i. other officials specified by law;
- ii. Any candidate for political office;
- iii. Any person holding a political position;
- iv. Any person acting on behalf of a public/GO; and
- v. Any employee of a company owned by the government.

Refer to the *Anti-Bribery and Anti-Corruption Policy, Donations and Sponsorships Policy, Gifts and Hospitality Policy* for more details.

Guidance

Q43: As part of a project you are leading, you were just informed that in order to get approval you will need to pay a fee. Should you pay the fee?

A43: Do not pay money or provide benefits to anyone in order to secure business or a contract. Report the situation to the Administration Division and the Compliance Unit.

20. Corporate Social Responsibility

ACSE embraces the role and responsibilities as a corporate citizen. While the mission is to better lives through mobility, ACSE also recognizes the responsibility of economic and social development through corporate-sponsored activities in the communities. ACSE supports Employees’ efforts to positively impact the communities and demonstrates commitment to being a good corporate citizen. ACSE contributes to its communities and supports initiatives that help strengthen these communities, making them better places to live and work. ACSE partners with organizations who are focused on improving mobility, the environment, education and safety. ACSE Employees:

- Have the option to participate in volunteer activities through company philanthropy programs or established business partnering groups;
- Represent ACSE in the community on company-sponsored boards and committees and at events;
- Encourage Employees to give their time and talents to other organizations that work to improve the communities; and
- Follow the *Gifts and Hospitality Policy, Donations and Sponsorships Policy, and Travel Policy*.

Guidance

Q44: What are some examples of philanthropy programs or volunteer activities to get involved in?

A44: Below are several examples of ways to participate:

- Join activities in planting trees and campaigns to prevent global warming
- Join activities for cleaning plant areas
- Join activities for blood donations
- Donation for schools, hospital, or other organizations that work to improve communities

21. International Trade

ACSE complies with international trade regulations. As a global company doing business in many countries, ACSE recognizes the responsibilities in helping increase safety and security in international commerce by complying with all applicable trade regulations and restrictions. Many countries place controls on the import

and export of sensitive equipment and data or restrict business with certain groups, individuals or countries.
ACSE Employees:

- Are familiar with and comply with all applicable laws and company policies regarding international trade restrictions;
- Do not sell, market to or partner with organizations or individuals that are on government sanction or boycott lists;
- Report concerns if there may be an inappropriate export of sensitive data or equipment;
- Represent ACSE when working overseas and elsewhere by acting consistently with the local cultures and traditions and within Thai and local laws; and
- Consult supervisors, the Administration Division or the Compliance Unit when in doubt that actions may cause conflict against the local culture, laws, or international laws.

Guidance

Q45: I am partnering with a team in Japan on a contract with a global supplier. The standard contract language may not cover everything for this particular project. What should I do?

A45: As a global company, we need to think about the reach of our activities. Sometimes activities can be directly impacted by many international trade compliance laws and regulations. It is important to contact the Administration Division and the Compliance Unit with concerns related to global activity.

Q46: I am on an overseas business trip, I heard from a fellow Employee that one of the local companies we are thinking of working with on this project has a negative reputation and may have been in trouble regarding trade laws. What should I do?

A46: Escalate immediately to the Compliance Unit, Administration or Business Division your concerns and seek guidance on how to perform due diligence on the local company prior to entering into any binding agreements with that company.

22. Social Media

ACSE recognizes the opportunities social media gives to connect, learn and share and is always responsible in online activity. Social media is a powerful tool for enhancing communication and collaboration. It helps us foster more meaningful connections with Employees, customers, investors and communities. ACSE is responsible and thoughtful in its social media activity to prevent harm to its people, its information or ACSE's reputation. ACSE Employees:

- Maintain the same high standards of ethics and courtesy in online exchanges as in person;
- Keep confidential information (about the Company, Employees, customers and Business Partners) secure and out of public view and never disclose without authorization; and
- Make clear that any opinions expressed are individual to the Employee.

Examples of social media include the following:

- Internet forums (e.g. www.pantip.com)
- Social blogs (e.g. Facebook, LINE Timeline)
- Wikis (e.g. Wikipedia)
- Photographs or pictures (e.g. Instagram, Snapchat)
- Rating and social bookmarking (e.g. Wongnai)
- Weblogged (e.g. www.headlightmag.com)
- Microblogging (e.g. Twitter)
- Podcasts (e.g. thestandard.co/podcast)
- Video (e.g. YouTube, Tik Tok)

Guidance

Q47: Last night, when I was looking at one of my social media feeds, I noticed a post by an Employee with whom I am friends. He had posted photos of parts not yet released to the public. He was commenting on how excited he was about helping in its development. Should I ask him to take down the post?

A47: You should report your concern to your supervisor, Human Resources, General Affair (“GA/IT/Safety”), or via the Speak-up Line. Employees should not share confidential, non-public information at any time without express authorization from company leadership.

Q48: I was reading articles on a automotive industry blog written by someone not employed by ACSE. The article seemed to have a lot of specific facts and data related to one of our products. I am concerned that some of the information may be confidential. Who should I talk to?

A48: You should report your concern to your supervisor, Human Resources, GA/IT/Safety or via the Speak-up Line.

23. Summary

Shared values are the foundation for ACSE success. The Code of Conduct guides ACSE Employees to:

- Value fellow Employees;
- Strive for the safety and satisfaction of customers every day, working to continuously improve what ACSE delivers;
- Build relationships based on trust;
- Act with integrity and keep promises; and
- Embrace the role and responsibility as a corporate citizen.

This document has been published using short and straightforward language for easy understanding. If an interpretation is needed, it should focus on intent, rather than words. When there is any doubt, or an action is encountered that is or may be unethical, Employees should consult a supervisor, the Administration Division, or concerned work unit.

Other than clear violations of this Code of Conduct, the following actions are regarded as violation as well:

- Advise, promote, and encourage another person to violate the Code of Conduct;
- Neglect or ignore it upon witnessing a violation;
- Obstruct or not cooperate with fact finding activities;
- Retaliate against a “whistle blower” or otherwise treat a reporter unfairly; and
- The Company considers the Code of Conduct as its policy, and any violators are subject to corrective action up to and including termination as well as prosecution relevant to any relevant country or local laws.

All Employees must declare their commitment to the Code of Conduct. *Refer to Appendix A for Declaration of Compliance with Code of Conduct form.*

24. Additional Resources

- ACSE Anti-Bribery and Anti-Corruption Policy
- ACSE Speak Up Policy
- ACSE Non-Retaliation Policy
- ACSE Donations and Sponsorships Policy
- ACSE Gifts and Hospitality Policy
- ACSE Travel Policy

Remark: This list is not exhaustive.

25. Appendix

- **Appendix A:** Declaration of Compliance with Code of Conduct

Appendix A to the Code of Conduct: ACSE Code of Conduct

Auto CS Engineering Company Limited

Employee Declaration on Compliance with ACSE Code of Conduct. Employees will sign this Declaration on Compliance using the designated form.

I have thoroughly read the Code of Conduct including the guidelines and precautions. I am aware that violation of the Code of Conduct is regarded as a violation of the Employee Handbook. I am aware of the Company's policy to have all Employees comply with it and to detect any unethical practices.

By this Compliance Declaration, I declare to Auto CS Engineering Company Limited that as of this time forward:

- a) I am currently in compliance with the Code of Conduct and all Company's policies
- b) I will work in compliance with the Code of Conduct and will not violate any part of it.
- c) If I am aware of any violation of the Code of Conduct, I will report it to my superior or the Compliance Unit.

ACSE Code of Conduct
Revision 000 : October 1, 2022

Administration Division
Telephone: +66 38 214 036 - 40
Fax: +66 38 214 041
E-mail: miki@auto-cs.co.th

Support Department:
Human Resource (Ms.Jantana)
Mobile phone 065-717 0042
E-mail: i_jantana@auto-cs.co.th

Auto CS Engineering Co., Ltd.
700/95 Mu 1 (Amata City Chonburi Industrial Estate)
Bangna Trad Km.57, Tambon Ban Khao
Amphur Panthong, Chonburi 20160, Thailand
Tel: +66 38 214 036-40 Fax: + 66 38 214 041