



CHRISTIANI & NIELSEN

CHRISTIANI & NIELSEN (THAI) PUBLIC COMPANY LIMITED Business Ethics and Code of Conduct

The Company is committed to conducting business on the basis of morality and with social responsibilities. We are committed to creating add value to our shareholders. All stakeholders shall be treated fairly and their needs shall be met equally.

The Company has clearly announced that it is the duty and responsibility of all Directors, Executives, and staff to faithfully follow the Business Ethics and this Code of Conduct. They shall strictly comply with the policies and procedures stated in this Code of Conduct. The Company's ultimate goal is to achieve its business objectives under good corporate governance for the benefit of all stakeholders and for the sustainability of the Company.

Definitions

Business Ethics refers to goodness, fairness, and justice that business conduct should uphold.

Code of Conduct is a code of behavior to be followed in order to maintain and promote dignity and reputation.

Our Principles: we are committed to:

Honesty

Company executives should be truthful to people involved. They should not intentionally mislead or deceive others by distorting information, exaggerating, or giving partial truth. Neither should they discriminate against people by doing or abstaining from doing something that is required to be done.

Integrity

Company executives should exhibit their personal integrity and courage to do what's right despite the pressure to do the opposite. They should be a person of principle, respectable, and impartial. They should fight for what they believe in and shall never compromise their principles for the sake of any goals to the point that would turn them into deceivers or immoral persons.

Trustworthiness

Company executives should reveal facts and provide relevant information, in addition to correct any misunderstanding. They should try in every proper way to fulfill their promises. They should not abuse technical or legal interpretation as an excuse not to cooperate or comply with contractual obligations.

Loyalty

Company executives should exhibit their loyalty to the Company by dedicating themselves to their duties and to the people. They should provide support and assistance whenever required. They should not use or disclose confidential information for personal advantage. On the contrary, they should maintain the ability to make decisions independently, professionally and avoid inappropriate behavior or conflict of interest. They should be faithful to the Company and their colleagues. If the executives intend to leave the company to work somewhere else, they should notify the company in advance. They should also keep company's information confidential. They should not exploit their former positions for their own benefit.

Fairness

Company executives should be fair and just towards all people. They should not use their power arbitrarily. Neither should they resort to cheating nor inappropriate tactics to obtain or maintain benefits or advantages from misled or distressed people. Fair-minded executives should disclose the agreements for review. They should treat everyone equally, be open to different opinions, willing to admit the mistakes they make, and willing to shift standpoint or attitude to the correct ones.



Concern for others

Company executives should be considerate, sympathetic, kind, and well-intentioned to others. As the golden rule says, "Treat others the way you want to be treated". Executives should provide the help that people need. They should also pursue proper means to achieve business objectives. However, they should make sure that business objectives are aligned with people's objectives and benefits.

Respect for International Human Rights Principles

Company executives should respect and honor human rights that each person is entitled to. Human rights here refer to the rights to freedom and equality that are protected by domestic and international regulations. In addition, the management shall avoid violating human rights against the employees, joint ventures, business partners (suppliers, sub-contractors), clients, and local communities at all cost.

Company executives should make decision carefully and neutrally. Everyone shall be treated equally. The management shall strongly adhere to the international human rights principles: adhering to legal principle, respecting human dignity, and encouraging everyone to respect individual's basic human rights. No preferential treatment must be allowed. Everyone must be treated with respect regardless of their race, ethnicity, and color of the skin, family background, religion, social status, gender, age, characters, physical appearance, mother tongue, political opinion, financial status, or any other status. The management shall never use illegitimate labour, child labour, or anyone that will exhibit disrespectfulness against human rights. The management shall conduct oneself in such a way that complies with international human rights that protect human liberty and equal opportunity.

Commitment to Excellence

Company executives should excel in their performance, i.e., should be equipped with knowledge, be prepared, and should work hard to enhance knowledge and skills to cope with every issue under one's responsibilities.

Leadership

Company executives should be aware of their own responsibilities and leadership requirements and should seek to comply with code of conduct models that would benefit themselves and the organization. They should also attempt to create an environment in which principles and ethical decision-making are given utmost importance.

Reputation and Morality

Company executives should create and defend company's reputation, as well as employees' morale. They should either individually or collectively avoid any action that would destroy relationship between the company and employees. On the other hand, all employees must individually and collectively do everything necessary to correct and prevent any wrongdoing committed by others.

Accountability

Company executives should be aware of, and be accountable for their own ethical conduct. They shall uphold below business ethics when deciding or not deciding to do something for the Company, for themselves, for their colleagues, and for the community.

Business Ethics

1. Policy on Compliance with the Law and Relevant Rules and Regulations

The Company is committed to complying with all relevant laws, rules and regulations everywhere we operate. The company has established the policies as follows:



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- Directors, Executives and staff must comply with local laws, rules, regulations as well as customs and traditions of the country in which the Company operates.
- Directors, Executives and staff must comply with the announcements and stipulations of the Stock Exchange of Thailand (SET) and the Securities and Exchange Commission (SEC).
- Directors, Executives and staff must comply with the Company's rules and regulations.
- Directors, Executives and staff must not assist, support or conspire to avoid any legal or regulatory compliance.
- Directors, Executives and staff must cooperate with supervisory agencies as well as report any violation or non-compliance with existing laws or regulations to concerned persons.

2. Policy on Conflict of Interests

The Company has viewed activities that may cause conflict of interests in relation with Directors, Executives and staff as important. Therefore, the following guidelines have been established:

- Avoid any transaction related to oneself, which may lead to a conflict of interest with the Company.
- If it is necessary to carry out such transaction for the Company's benefit, conduct it as if it is a transaction done with a third party. However, any of such transaction must be fully disclosed and approved by the relevant authority within the Company in advance. Furthermore, Directors and Executives or staff who may benefit from such transaction must not be involved in the approval process.
- If a transaction is considered as connections by SET's announcement, Director, executive and staff must strictly comply with the rules and procedures regarding information disclosure by listed companies for such transactions.
- If Director, Executive, staff or a member of their family is involved with or becomes a shareholder in a business in competition with the Company or any other business that may cause a conflict of interest with the Company, he/she must inform the Board in writing through the company secretary at least before the consideration of such agenda at the Board of Directors' meeting and record in the minutes of the meeting.
- If Director, Executive or staff becomes a Director, partner, advisor or participant in any other companies or business organization, such position must not be conflicted with the Company's business or that person's direct responsibilities in the Company.

3. Policy on Confidentiality of Information

The Company has established an important policy concerning the use of information. We shall comply with good corporate governance and relevant regulations. The Company has advised the Directors, Executives and staff to focus on confidential information especially internal information not yet disclosed to public or any data or information that may affect company's business or its share price. The guidelines are as follows:

Policy on Insider Information

To comply with the Corporate Governance principles, the Directors, executives and staff knowing or having access to inside information of the Company, with significant effects on the stock price, shall act in accordance with the following procedures:

- a) Directors, Executives and staff must not use information they receive from their Directorships or employment for personal benefit or for conducting business or other activities in competition with the Company.
- b) The Use of Inside Information for Securities Trading:
 - The company impose non-trading periods on Directors, Executives (including their Relevant Persons) and staff involved in financial statement preparations i.e. Investors Relation Section, Finance and Accounts, Internal Audit and Commercial. They're prohibited from trading the Company's securities during a 30-day period preceding the announcement of quarterly reviewed



and annual audited financial statements, and also 2 days after any notification and also at least 5 days before the Company makes any significant announcement.

- The company requires Directors and Executives (as defined in the Notification of the Capital Market Supervisory Board) including Relevant Persons to disclose information on their shareholdings and to report their trading transactions related to the Company's shares to the Company and to the Securities and Exchange Commission within 3 days, pursuant to which the company secretary is responsible for collecting data on any changes in such shareholding (if any) for reporting as part of the regular agenda of the Board meeting.
- The company prohibits Directors, Executives, employees, and staff of the company from using inside information not yet disclosed to public which may affect a change of company's share price. They must not use their position directly or indirectly to obtain inside information for the purpose of trading/transferring company's shares/other securities (as the case may be) or soliciting others to do the same. Such action is prohibited whether it will be taken for the benefit of themselves or others. They are prohibited to disclose such inside information to the other person whether they may receive personal gain as a result or not.
- Prohibit the Directors, Executives, employees and workers of the Company from using the existing inside information or information which may affect a change of the Company's security value not disclosed to public, through direct or indirect means, that may cause direct or indirect damages, leading to personal or others' benefits, or disclosing such facts for others to do so with or without any individual returns.
- Director and Executive are encouraged to inform the Company about their intention to trade/transfer the Company's shares/other securities (if any), at least 1 day in advance.

Classification of confidential information

Inside information which is regarded as confidential shall be safeguarded and not disclosed to outside parties. Information may be classified according to its significance, such as open information, classified information, confidential information and top secret information. The usage of non-disclosed information of the Company may lead to the loss or affect the competitiveness of the Company. Such confidential information includes electronic data, financial statements, operating performance, business information, future plans and/or anything else. Employee shall not disclose such confidential information while working for the Company or after no longer working for the company.

Information Disclosure to Public

- Disclosure of information must be complied with rules and regulations set by the Securities and Exchange Commission (SEC) and relevant laws and regulations.
- Inside information to be disclosed to outside parties shall be approved by the Managing Director or any other authorized person, such as the Investor Relations sector, Business Development Department.
- Information on company's operating results shall not be disclosed to outside parties with in a 7-day period before the Company's disclosing the information to the Stock Exchange of Thailand. There shall further not be any meeting session for information sharing, group meeting, or answers of questions concerning the operating results for shareholders, investors, securities analysts and the press during this period.

4. Policy on safeguarding Company Property

The company expects Executives and staff to take responsibility to protect company's assets and utilize company's resources and assets in the most efficient manner. Executives and staffs must also increase corporate's competitiveness and provide the best possible service to their clients. The followings are guidelines:



4.1 Protection of the Company's properties and assets

- Executives and staff should use the Company's resources and assets efficiently for maximum benefit of the Company.
- Executives and staff shall not use the Company's resources and assets for their own benefits.
- Executives and staff shall help protect the Company's properties and assets from improper depreciation or loss.
- Executives and staff shall set and follow proper preventive measures and procedures. They shall arrange to have necessary insurance to protect against fire, natural disaster, burglary, risk, or any other damages.

4.2 Documentation

- Executives and staff shall prepare documents with honesty and prudence to ensure that standards are met.
- Executives and staff are prohibited from falsifying the Company's letters, reports or documents.

4.3 Use of Computer and Information Technology

- All computers, information technology, and electronic data installed in company's computers are considered the property of the company. Executives and staff should not use the company's computers and information technology for personal benefits.
- Executives and staff are prohibited from revealing their password for accessing the Company's information system.
- Executives and staff are prohibited from disclosing any information or data in the company's information system to other parties without proper authorization.
- Executives and staff are prohibited from changing, copying, deleting or destroying the company's information or data without proper authorization.
- Executives and staff are prohibited from using illegal software for any reasons including using copyright protected software without the permission of the copyright owner.
- Executives and staff are prohibited from using company's electronic mail to transmit derogatory, offensive, pornographic, abusive or disturbing messages. That includes recording the same on Company's computers.
- Executives and staff may only use the internet to seek information and knowledge related to their work and shall not access illegal or immoral websites.
- Staff should use all communication equipment such as telephones, facsimile machines and mobile phones provided by the Company, with appropriate sense of responsibility and care. They shall think of company's benefit first.

5. Ethics for Intellectual Properties Rights

The Company requires that Directors, Executives, and staff respect the intellectual property rights of others. Everyone must be watchful and cautious with intellectual properties.

6. Policy on preventing fraudulent and/or corruption

The Company has a policy to prohibit all forms of fraudulent and/or corruption, either directly or indirectly to advance its business benefits. The Company has a zero tolerance policy for fraudulent and/or corrupt behavior and will take fraudulent and corruption transactions, including any transactions which may lead to such manner, very seriously. Any violation of this policy is regarded as a serious matter by the Company and will result in disciplinary action, including termination, and legal prosecution in civil or criminal laws.

The Company has established channels for reporting any misconduct, fraudulent act or corruption and provides protection and remedies for any person who files a complaint or cooperates with the investigation of the charge.

7. Policy on Giving and Accepting Gifts and excessive or undue Hospitality

Business decisions should never be based on gifts, benefits and/or excessive/undue hospitality received or offered through our business relationships. Selection of suppliers and business partners made by us or our clients, must be based on objective factors such as price, quality, standard, service, and value. The Company requires Directors, Executives and staff to abide by this Guideline to avoid conflict of interest. Offering gift/benefit/excessive or undue hospitality can be seen as bribery, which may blemish the company's reputation and violate anti-bribery and anti-corruption laws.

The Company has guidelines concerning offering and accepting gifts and hospitality as follows:

- Directors, executives and staff are strictly prohibited from demanding any gift, benefit and/or hospitality from any trading partners or other external parties with whom the Company is doing business with.
- Directors, executives and staff are strictly prohibited from offering any gift, benefit and/or hospitality to any trading partners or other external parties in any attempt to persuade them to commit a fraudulent action.
- Directors, executive and staff are not allowed to give/accept any gifts, benefits, and/or excessive or undue hospitality to/from any trading partners or other external parties (including government agencies, quasi-government agencies, suppliers, banks, service providers), company is doing business with.
- However, if necessary, the gifts must bear the giver's company's logo/emblem on them. Such gifts must not be given for the purpose of business obligation. Otherwise, gifts can be donated to charitable organizations with appropriate procedures.
- Any normal business hospitality, such as receptions, tea/coffee, meals, or other similar nature that is directly relating to business operations or trading traditions without being excessive, is excluded from this requirement. However, such expense should be within a reasonable amount and should not be related to any business commitment.

8. Procurement

Procurement is to be conducted according to the company's guidelines, procedure and should be fair to all involved. The procurement decisions are to be made on the basis of reasonable prices, quality, service, including applicable products' standard such as Environmental Standards, Industrial Standards. The process shall be transparent and inspectable. The Company Guidelines concerning the procurement are as followed:

- Strictly follow the process set forth in the procurement and purchasing regulations, and act within the scope of authority provided.
- Avoid involvement in purchasing from contractors to whom you have relations with, such as family members, relatives, or entities in which you have ownership or shares.
- The priority in procurement should be given to legal entities rather than individual persons, except the case that special expertise is required from the particular individuals or where the benefit of the Company demands so.
- Avoid using the information you obtain from procurement activities for benefit of yourself or others.
- The purchase of raw materials which are harmful to environment such as asbestos are prohibited. Use substitute raw materials which are environmental friendly or reusable instead.

9. Transactions with the Government

Transactions with the Government must not be in such a way that persuades the government or government officials to do anything wrong or inappropriate. Mutual acknowledgement and building relationship within the proper bounds and normal practices, such as offering congratulatory messages and flowers on public occasions are acceptable.



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The Company Guidelines concerning the transactions with the Government are as followed:

- Conduct yourself properly and honestly when in contact with government officials or agencies.
- Always remember that the laws, rules and customs of each place may have diverse conditions, procedures, or methods of proceeding.
- Comply with the laws of each country and/or of locality in matters pertaining to hiring government employees as consultants or employees of the company. Such hiring must be transparent and appropriate.



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Code of Conduct

1. Code of Conduct for Executives

- Perform duties with honesty, transparency, and fairness to ensure that the decisions and actions are made to the possible extent which suits the best benefits of all the stakeholders.
- Perform duties professionally with knowledge, skills, determination, and prudence. Be watchful of trouble in advance and seek remedies for anticipated problems. Maintain the Code of Conduct. Apply knowledge and skills to manage the Company to the best of your abilities.
- Do not seek to benefit yourself by abusing undisclosed or confidential information inside the company. Do not disclose inside information to outsiders, or do anything that can be construed as a conflict of interest.
- Provide regular supervision and inspection, both inside the Company and its environment to ensure compliance to set policies and procedures.
- Arrange to have accurate, complete, timely, and consistent reports as well as reports on future trends of the Company, based on probability and adequate supporting data.
- Comply with laws and regulations. Be observant of up-to-date industrial standards and set guidelines. Maintain adequate and appropriate documents for overseeing operations. Ensure all operations are in compliance with guidelines and applicable to every level of Management. Ensure all operations are proceeded efficiently. Business activities must be categorized with appropriately approval process. The authorization/approval process must comply with laws and regulations.
- Develop the business of the Company to achieve objectives and generally acceptable standards.
- Promote knowledge and understanding about the company.

2. Code of Conduct for Board of Directors

- Set the direction, goals, policy and business strategy.
- Perform duties honestly and carefully for the benefit of the company.
- Comply with laws, rules, regulations as well as ethics and good corporate governance practices. Conduct business in accordance with company's rules and regulations.
- Monitor corporate's operations to ensure all objectives are achieved.
- Appoint sub-committees. Set clearly and appropriately roles and responsibilities of the Sub-committees.
- Monitor important business transactions with due care and diligence.
- Arrange to have regular Board meetings with appropriate agenda.
- Assess regularly the Board's performance.
- Arrange to have a succession plan for Senior Management levels of the Company.

3. Code of Conduct for Sub-Committee

- Perform duties assigned by the Board of Directors with due care and diligence.
- Perform duties honestly, carefully and for the benefit of the Company without any conflict of interest.
- Comply with laws, rules, regulations as well as ethics and good corporate governance practices. Conduct business in accordance with Company's rules and regulations.
- Report the performance to the Board regularly.

4. Code of Conduct for Individual Directors

- Diligently perform all duties assigned by the Board of Directors.
- Perform duties honestly, carefully and for the full benefit of the Company.
- Comply with laws, rules, regulations as well as ethics and good corporate governance practices. Conduct business in accordance with Company's rules and regulations.
- Ensure Management achieves the Company's objectives.



- Ensure confidentiality of all inside information. Prevent information leakage to outside of the Company. Do not use inside information not yet disclosed to the public for personal gain.
- Avoid any action or decision that may lead to conflict of interest.

5. Code of Conduct for Company Secretary

- Diligently perform all duties assigned by the Board of Directors.
- Perform duties honestly, carefully and for the benefit of the Company.
- Oversee activities of the Board and the Company. Ensure such activities are in compliant with the laws, rules, regulations, ethics, good corporate governance practices, and company's rules and regulations.
- Hold shareholders' meetings, Board and Sub-committee meetings. Prepare minutes of meetings promptly and fully.
- Act as a good communication centre between Directors and Shareholders.
- Keep all inside information confidential including minutes of meetings of the Board and Sub-committees'. Prevent information leakage to outside of the Company. Do not use inside information not yet disclosed to the public for personal gain.

6. Code of Conduct for Staff

- Perform all duties honestly, carefully and for the benefit of the Company.
- Comply with laws, rules, and regulations. Follow good ethics while doing business.
- Keep all inside information confidential. Do not leak any inside information to the outside of the Company. Do not use such inside information not yet disclosed to the public for personal gain.
- Maintain harmony among all co-workers and staff in the Company.
- Strictly respect International Human Rights Principles.

7. Policy and Practices toward Stakeholders

The Company is committed to professionally, ethically, and morally conducting business with an aim towards prosperity. The Company recognizes the rights of all stakeholders. Therefore, cooperation between the Company and all the stakeholders; employees, clients, trading partners, creditors, government agencies, community and society at large are encouraged. Directors, Executives and staff must comply with the Code of Conduct which has been established to ensure fair and equal treatment with all stakeholders.

The following practices are guidelines for treating stakeholders:

Shareholders

The Company is responsible for disclosing information, accounting procedures, internal information technology usage, and conflict of interest to the shareholders, groups of financial investors, and creditors. Executives must be honest. Decision must be made based on honesty and fairness to both major and minor shareholders, for benefit of all.

Clients

The Company success is based on client's satisfaction; therefore, we have to maintain good relations with our clients by being honest and moral and trust each other. The Company realizes that each client has different expectations. The company has policy to meet client's expectation as followed.

- Respond to the needs of client with best quality of works and services.
- Provide guaranteed quality works, within agreed terms and construction periods.
- Never hand over works with material defects to clients.
- Minimize cost of construction while maintaining quality of works and services to meet standard.



- Seek by all means to increase benefits of the clients. Inform clients in advance if the company is unable to comply with any agreement, in order to find solution and protect both parties' best interests.

Trading Partners and/or Creditors

The Company has a policy to treat its trading partners and/or creditors equally and fairly. The Company must take company's utmost benefits into consideration on the basis of mutual and fair benefits for both parties. The Company must avoid circumstances that may lead to a conflict of interest.

The Company must ensure that the best practices for procurement process from suppliers are set in place. The Company must comply with trade terms and loan terms from financial creditors. If there are any objectives of loan, repayment, collateral, or any other terms and conditions that the Company cannot comply with, we shall inform the trading partners and/or suppliers right away, so that solution can be sought out together.

The Company Guidelines for selection of suppliers shall be as followed:

- Suppliers shall be selected based on their ability to serve the needs of the company in the most economical, efficient manners. Their expertise and financial status are to be considered. In addition, they have to strictly comply with laws and regulations.
- Past performance of suppliers and cooperation with the Company should be important factors in supplier selection.
- Whenever the existing suppliers are not sufficient to fulfill the Company's business needs, Purchasing / Procurement Departments must seek and add new suppliers.
- All suppliers must accept and comply with company's Supplier Code of Conduct.

Competitors

Fair Competition

The Company has established measures to prevent unfair competition and trade barriers. The Company must act within the rules of fair trade. Do not destroy trade competitors' reputations by false allegations against them. The company must not access competitors' confidential information using dishonest or inappropriate means. The Company has to also strictly follow its policy on conflict of interests, business ethics, disclosure and transparency.

Employees

- The company realizes that employees are one of the key success factors in business operation. In human resources management, the Company provides equal opportunities in employment, job security, and career advancement.
- The compensation, welfare and fringe benefits such as monthly salary, bonus, provident fund etc. shall be determined based on roles and responsibilities, performance, and company long and short term performance.
- The Company must ensure that employees have adequate knowledge and skills to perform their duties, and that their knowledge and skills are necessary for company's business operation. The Company must support and encourage employees to develop themselves and improve their skills to keep up with the ever-changing trend of the industry.



Community and Society

- The Company has well realized the responsibility toward the community and society. That includes providing support to activities that will contribute to local community. The company shall do more than the law required and try to instill corporate social responsibility in everyone in the company.
- The Company is expected to conduct business that will benefit the economy and society while safeguarding the customs and traditions of communities wherein we operate. It is also company's policy to become a responsible corporate citizen that is to comply with all laws, rules and regulations. In addition, the company shall continue to uplift quality of life. We can achieve this individually or collaborate with public authorities or local communities.

8. Policy on Safety, Occupational Health and Environment

The Company is committed to conducting business with the highest standards of safety, occupational health and environmental conditions. The company has established the following general guidelines:

- The Company shall comply with all legislations and regulations relating to safety, occupational health and environmental requirements in all locations in which the Company operates.
- The Company shall follow practices that constantly ensure safe working environment for all employees' lives and that of the company's subcontractors and other persons working on Company's sites.
- The Company shall encourage health and safety awareness at all levels. Promote procedures and practices that ensure environmental protection. The company shall take into account current legislation and industry codes and practices.
- The Company shall encourage and raise staff awareness regarding the importance of environment sustainability.
- The Company shall fully disclose all information regarding its operations and standards in relation to safety, occupational health and the environment.

9. Enforcement of this code of conduct

The Company has clearly announced that it is the duty and responsibility of all Directors, Executives and staff to faithfully follow the Business Ethics and comply with the policies and practices stated in this Code of Conduct. All supervisors must take lead to comply with and be responsible for this code. They must consider it as priority to ensure that their subordinates truly learn, understand and comply with this Policy and Code of Conduct.

10. Whistleblowing Policy

To ensure fair treatment of all stakeholders under this Code of Conduct, the Company has set up a channel for any business suggestions, complaints, or recommendations. The whistle blowing channel has been created for the purpose of informing the company about the impact of company's business, director's, management's, staff's performances, wrongful and unjust actions, code of conduct violation, corruption, or suspicion.

Communication and disclosure of information relating to the policy on whistleblowing/ complaints

The management shall communicate with directors, executives, staff or stakeholders of all groups to ensure that they understand the policy on whistleblowing, complaints and procedures. In addition, the management shall communicate about whistleblowing/complaint channels, as well as ensure that the information relating to the policy on whistleblowing/complaints are disclosed via proper channels, namely, Annual Report, Annual Registration Statement (Form 56-1), and on the Company's website.



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Whistleblowing/complaints

The Company's Board of Directors has assigned the Audit and Corporate Governance committee to be in charge of the complaints or suggestions as above. The whistleblower or the complainants can send a message by email or mail a letter to Secretary of Audit and Corporate Governance Committee at the following address:

By mail:

Mr. Ponpisith Charoenthai (Internal Audit Department)
Secretary of Audit and Corporate Governance Committee
Christiani & Nielsen (Thai) Public Company Limited
727 La Salle Road, Bangna-Tai Subdistrict, Bangna District, Bangkok 10260, Thailand

By e-mail: ponpisch@cn-thai.co.th

Other communication channels:

Hotline 66 2 338 8121

And/or other related departments as under:

Legal	66 2 338 8139	E-mail	sittiksu@cn-thai.co.th
Human Resources Management	66 2 338 8002	E-mail	alisani@cn-thai.co.th
Internal audit	66 2 338 8161	E-mail	ponpisch@cn-thai.co.th
Company Secretary	66 2 338 8121	E-mail	sophidpa@cn-thai.co.th
Investor Relations	66 2 338 8077	E-mail	phaneech@cn-thai.co.th

Whistleblowing on website www.cn-thai.co.th

Complaint Box within the Company

To launch whistleblowing/complaint, name-surname and telephone number of the whistleblower/complainant, factual details, witness, evidence together with documentary evidence (if any) are required. The Company shall keep all information confidential. If such whistleblower/complainant does not reveal his identity, clear and sufficient facts or evidence are required to prove the corruption.

The Complaint handling procedure

- When the whistle is blown or complaint is filed, the Secretary of Audit and Corporate Governance Committee or whistleblowing/complaints' receiver will collect the factual evidence of the corruption, breach or violation of Code of Conduct and then report it to Audit and Corporate Governance Committee or Executive Directors or Management Executives.
- Audit and Corporate Governance committee or Executive Director or Management Executives will assign Legal section, Human Resources Management Department and Internal Audit to jointly investigate all factual evidence and contact the whistleblower/complainants for more information. As such all information will be kept confidential.
- Whistleblowing/complaint receiver/designated person shall evaluate and review all evidence within 30 days. The assigned person shall categorize evidence i.e. management issue, truth finding issue, and so on.
- If the whistleblowing/complaint has solid proof that there's corruption, violation, or misconduct, the designated person shall come up with procedures to stop such violation or legal non-compliance acts. The company shall impose disciplinary punishment against any person who violates or fails to comply with the policy on anti-corruption, business ethics and company's rules and regulations deemed appropriate. The Company shall also proceed to alleviate the trouble for the inflicted person and mitigate damages that occurred.

- Appointed person is responsible for collecting all complaints, following up, and reporting the result of investigation to Audit and Corporate Governance Committee and/or to all relevant directors, management, depending on each case.
- Complaint receiver is responsible for notifying the whistleblower/complainant about the result provided that the whistleblower/complainant's identity is known.
- If there is any complaint lodged against the supervisor, the audit committee will be responsible for protecting the whistler-blower, the complainant, and the witness. The audit committee must ensure that no harm shall be done to them. If the complainant is harmed or treated unfairly in any way, the audit committee may be informed directly.
- Managing director is responsible for giving orders as seen appropriate to protect the whistleblower, complainant, and the witness. Managing director must ensure that no harm shall be done to them as a result of informing the truth.
- Managing director can assign one of the executives to give order to protect the whistle-blower, the complainant, and the witness on his behalf. However, the assigned executive himself must not be involved with the case either directly or indirectly. (The executive must not be one of the accused person(s) by his subordinate.) The person who receives the complaint is responsible for keeping the information and evidence confidential. He must not reveal information to anyone unless constructed by law.

Whistle-blower and Complainant Protection

In order to protect the rights of the whistleblower, the complainant and the informant, or those who participated in the investigation, the Company will conceal name, address and any information that can possibly identify them. In addition, the Company will keep all the information confidential. Only responsible person who conducts the investigation will be able to access such information.

Confidentiality

The Company realizes that the informer may wish to keep information confidential. In principle, the Company will keep all reports confidential. The company hopes that the informer will do the same. Therefore, informer's identity will be classified/confidential.

However, in certain circumstances, the informer may be required to give statement or evidence to Company's representative. If such circumstance occurs, the company cannot guarantee that all information can be kept confidential. However, the company will make sure that only necessary information can be revealed. Moreover, name of the informer will not be revealed without prior consent from the informer.

Informer Protection

No member of the Board, Executives or Staff who in good faith reports a violation of the Code of Conduct or reports a complaint or concern involving matters covered by this Whistleblowing Policy shall suffer harassment, retaliation or adverse employment as a result of such a report. An employee who retaliates against someone who has reported a violation, complaint or concern in good faith is subject to disciplinary punishment which includes termination of employment.

This Whistleblowing Policy is intended to encourage and enable Directors, Executives and Staff and others to raise concerns within the Company. In addition the policy will enable the company to promote good practices that comply with the Business Ethics, Code of Conduct and related policies. If an employee files a false complaint, such employee will be subject to disciplinary action such as termination of employment. Moreover, such employee may be held liable for damages incurred to the Company or to the person who is falsely accused.