



# Code of Conduct

(Revised version on September 1, 2020)



## **Delta Electronics (Thailand) Public Company Limited**

To All Delta Employees,

In order to implement transparent business operations, the Company draws up the “Code of Conduct” for directors, directors of sub-committees, management and all employees of Delta Electronics (Thailand) Public Company Limited and its subsidiaries. It defines guidelines for Delta employees on all levels to perform and helps them carry out their duties and assignments with integrity, trustworthiness, transparency, good morals and ethics. These are considered the keys for the Company’s business to grow sustainably and be acceptable to all stakeholders.

Whereas, the Company currently applies “Delta Code of Conduct” which has been announced since 2007, the Delta Code of Conduct is currently revised to for clarity and to cover the overall business operations. This Code of Conduct is considered an integral part of the Company’s Working Regulation. All directors, directors of sub-committees, management and Delta employees are required to study and perform according to this Code of Conduct.

A handwritten signature in black ink, reading 'Jackie Chang', written over a horizontal line.

(Jackie Chang)

President



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## **Delta Electronics (Thailand) Public Company Limited**

### **Code of Conduct**

The Code of Conduct (referred to hereafter as the “Code”) below is drawn up for observance by Delta Electronics (Thailand) Public Company Limited in the hope that Delta employees will produce better work performance, provide better products to customers, and observe laws and code of ethics to help uphold the Company assets, interests and image and contribute to the sustainable operation and development of the Company:

#### **1. Scope of Application and Ground Rules**

- 1.1 The Code applies to all members including the directors, directors of sub-committees, the management and all employees (collectively referred to as “Delta employees” hereunder) of Delta Electronics (Thailand) Public Company Limited and its subsidiaries (referred to as the “Company” hereunder).
- 1.2 As the Company has operations across the globe, affiliated companies and subsidiaries of the Company may establish and supplement more stringent policies and standards to reinforce the Code in accordance with discrepancies between local regulations, in order.
- 1.3 Delta employees shall observe all applicable laws and Company policies, and follow the principles of *“To provide innovative, clean and energy-efficient solutions for a better tomorrow” and “honesty and integrity.”* Delta Employees shall observe all regulations promulgated by the Company, including employment contracts, the Code, working rules and information security policies etc.

It is the obligation of all Delta employees to carefully study, understand and observe the Code and its revisions thereof. If there is any question or thoughts concerning the application of any law or regulation or the Code, Delta employees should seek explanation from their direct superior, head of audit department, head of human resources department, head of legal or company secretary.

#### **2. Conflict of Interest**

- 2.1 Conflict of interest refers to personal activities or investments of Delta employees that may interfere with their judgment for the execution of work, or where Delta employees fail to act based on the interests of the Company.
- 2.2 Delta employees shall make employee recommendations based on the interests of the Company and shall not be affected by personal relationships. Delta employees should not be involved in employment decisions related to spouse, parent, children, or other personnel with close relationships. Within the same working unit, superior-subordinate related Delta employees should not be involved in allowance, probation, promotion or be



in the same unit. Employment decision shall be made based on qualification, performance, skills and experiences.

- 2.3 Unless with prior approval of the unit head, Delta employees are prohibited from operating, undertaking or investing in enterprises that engage in the same or similar businesses as those of the Company under their own or other's name (including, friends/families, proxies, partnerships, or other representatives). Besides, Delta employees shall not act concurrently as an employee, nominee, consultant, or work in other capacities at another company that competes with the Company.
- 2.4 Delta employees should stay alert to avoid potential conflict of interest and shall not engage in any business, investment or activity that could impact the interests or interfere with the business of the Company. Conflict of interest includes but is not limited to using Company property or abusing one's own position inside the Company for personal gain; transferring the resources or interests of the Company to oneself or friends/families; negotiating or engaging in transaction for oneself or friends/families that is adverse to the interests of the Company; and investing in other companies or plants that compete with the Company.
- 2.5 Delta employees shall not take advantage of their position inside the Company to recommend, sell, or act as an intermediary to introduce products or services not provided by the Company for personal gain.
- 2.6 If a Delta employee has any question over whether the business, investment or activity he/she engages or plans to engage in constitutes a conflict of interest, such Delta employees should disclose to their direct supervisor for obtaining the approval from the head of the unit. Then, notify the head of the human resources department in written report before the investment of activity.

### **3. Receiving Gifts and Entertainment**

Delta employees shall observe the Code when conducting business dealings with Company's customers, suppliers, partners or other business-related third parties (collectively referred to "Business-Related Third Parties").

- 3.1 Delta employees shall observe laws/regulations, customary business practice and business etiquette when communicating with Business-Related Third Parties.
- 3.2 Delta employees shall not actively or passively, directly or indirectly, receive, commit or solicit any inappropriate interests, in their names or others', or behave in any way that is in the breach of good faith, illegal or in breach of fiduciary duties (referred to as the "dishonest behaviors" hereafter). The "Interest", as mentioned in the Code, means anything of value, including monetary compensation, gifts, commission, position, services, discounts and kickbacks, in whatever form or name. However, the Interest



does not include gifts within reasonable normal social practices, on an occasional basis, and without the possibility to affect specific rights that satisfy the following.

- (1) It is made under local courtesy, customary business practices and during the course of domestic or overseas visits, receiving guests or visitors, business promotion, communication and coordination, as part of business etiquette.
- (2) It is on the basis of normal social practices, business purpose or relationship promotion to attend or attend normal social activities.
- (3) It is required as part of the business operation to attend certain specific business activities, factory visits etc., of which the expenses allocation, number of participants, level of accommodation and duration have been specified in advance.
- (4) In the event of gifts for normal social purposes, in principle, such gifts shall not exceed 1,000 Baht (one thousand Baht), and gifts received from the same giver within the same year shall be limited to 3,000 Baht (three thousand Baht).

3.3 Delta employees shall report to their direct supervisors in the event of receiving gifts or interests. Such gifts or interests shall be returned if their direct superiors determine that such receipt is inappropriate or is not in compliance with customary business practice.

If a Delta employee has any question over the acceptance of gift or anything of value (including meals, entertainments and travel), he/she should first consult the opinion of his/her superior to avoid controversy.

#### **4 Business Integrity**

4.1 Delta employees shall not bribe the competent authorities or other government officials. "Bribe" refers to giving or offering valuable items or interests to government officials for the purposes of obtaining or maintaining businesses, affecting business or non-business decisions made by government officials, or for obtaining business interests, such as monies, gifts, commissions, employment opportunities, discounts, rebates, and entertainment, etc., regardless of observing local practice, customs, or expanding Company business.

4.2 Delta employees are prohibited from soliciting, arranging or accepting a bribe for the employee's benefit or that of the employee's family, friends, associates or acquaintances.

4.3 Bribery is criminal behavior that may result in material punishments. Delta employees shall observe all applicable requirements related to anti-bribery and anti-corruption (including relevant laws in the countries where they work/or other countries)

4.4 Delta employee shall observe all applicable requirements related to anti-money laundering. If the location/nation where the Company operates has established laws in relation to cash report or other suspicious transactions, Delta employees shall observe such laws.



## 5. Business Operation with Integrity

5.1 Before establishing business relationships with others, the Company shall evaluate the legitimacy, integrity, and operational policy of the agents, suppliers, customers or any other business dealing entities, and whether there are any records of dishonesty, to ensure such entities' business operation is with integrity, transparent, and will not demand, offer or receive bribes.

In making the above evaluation, the Company may conduct appropriate audit procedures to evaluate its business dealing entities on the following subjects to understand its integrity and operation:

- (1) Such entity's nationality, place of operation, structure, operational policy and place of payments.
- (2) Whether or not such entity has established any policy on business integrity, and, if so, its implementation.
- (3) Whether its place of operation is in countries with high risk of corruption.
- (4) Whether its business operated is a business with high risk of bribes.
- (5) Such entity's long term business operation and its goodwill.
- (6) Peer opinions from its trading partners.
- (7) Whether such entity has any record on bribes, illegal political donations or any other dishonest behaviors.

5.2 Delta employees, during the course of conducting business dealing, shall explain to the dealing entities the Company's policy on business integrity and other relevant rules. Delta employees shall explicitly reject any offering, promise, demands or receipt, directly or indirectly, in whatever form or name, of illegitimate interests, including kickbacks, commission, facilitation payments, nor offer or receive any illegitimate interests through any other means.

5.3 Delta employees shall refrain from conducting any business transactions with any dishonest agents, suppliers, customers or other business dealing entities. Once any dealing entity is found with dishonest behavior, the Company employees shall immediately stop any business interactions with such entity and categorize it as a dishonored account in order to implement the Company's policy on business integrity.

5.4 When dealing with others, the Company shall fully understand the counterparty's policy on business integrity and make the compliance of business integrity as part of the contractual terms as followings:

- (1) Each party shall immediately notify the other party, in the event of being aware of any of its member breaching any contractual terms, which prohibit kickbacks, commission or any other interests. Each party shall disclose the identity of such member, the method of providing, promising, demanding or receiving of money or other interests and the amount thereof, and shall provide relevant evidence to the other party and cooperate in the investigation of the



other party. Such party shall be entitled to indemnification in the event of any damage or loss.

- (2) Each party may terminate or cancel the contract without cause immediately if the other party engages in any dishonest behaviors in the performance of business activities.

## **6. Political Donations, Political Participation and Charitable Donations**

- 6.1 Political Right: The Company operates the business with political neutrality, not participating and siding to certain political party or influential political leader and not using the Company's capital, resource to support political parties, politicians directly or indirectly.
- 6.2 Delta employees shall not use the name or assets of the Company, including facilities, equipment, or trademarks, to carry out personal political activities or seek political interests. Delta employees shall be aware of their personal behavior when participating in any political activities to avoid giving impressions or causing misunderstanding to the public that the Company may support any prospective candidates, campaign, or issue, or providing any endorsement thereof.
- 6.3 Delta employees shall comply with the Company's rules governing charitable donations and sponsorship in making legitimate charitable donations or sponsorships in the name of the Company and not to be used for bribery. However, such charitable donation and sponsorship must be approved by the Head of Department and the budget set.

## **7. Insider Trading**

- 7.1 Insider information means any information that could affect the trading decision of prudent investors on certain securities or affect the market price of a company's securities.
- 7.2 Conducts of using insider information to trade stock of other securities are illegal. Transmit or disclose insider information to others to allow others to trade stock or other securities pursuant to the information is also illegal. Common insider information includes unpublished sales or revenue information, future gains or losses, significant events or news (i.e. restructuring, merger, or changes in the management, etc.)
- 7.3 If Delta employees have insider information in relation to the Company or suppliers or partners of the Company, they shall not directly or indirectly, carry out stock or securities transactions of the company or disclose such information to allow others to carry out the abovementioned transactions. Restrictions on carrying out indirect transaction includes transactions carried out by any person cohabiting with the Delta employees or economically dependent on the Delta employees.
- 7.4 The financial and business transactional information of companies under the Company are trade secrets and the insider information, which shall not be disclosed so as to not affect shareholder interest.



## **8. Fair Competition**

- 8.1 Delta employees shall observe requirements under the competition law, the fair trade act, and the anti-trust law of different nations. Delta employees shall not offer, induce, agree on, or engage in joint conducts of any joint pricing, market monopoly, agreement on resales price, preventing others from competitions and unlawful restrictions with other companies, customers, distributors, and suppliers having competitive relationship with the Company. On the other hand, they must not engage in conduct that restricts competition or hinders the fair competition by means of threats, bribery, or other dishonest methods.
- 8.2 If the competing companies participate in the businesses or association of exhibitions, seminars, industrial associations or alliances in a standard setting or group, Delta employees shall be mindful of their behavior when interacting with such companies. Delta employees shall avoid giving the public the impression that the Company is arriving at an agreement with competitors. In particular, Delta employees shall not in an circumstance discuss with competitors anything regarding sensitive information of prices, sales terms, region, customers, competitive bid, product line, service provided, quantity, costs, profits, market share, salaries, and employment process. If the meetings that Delta employees participate in involve any of the above topics the Delta employees shall, if possible, immediately propose an objection, form a record of the objection, and leave the venue.
- 8.3 If Delta employees find themselves, colleagues or competing companies violating any requirements under the competition law, the fair trade act, and the anti-trust law of different nations, the Delta employees shall report to the head of their unit immediately to adopt relevant countermeasures. When a Delta employees violates laws and regulations of fair trade due to his/her own conduct, the Delta employees shall be held legally responsible and shall compensate the Company for damages incurred thereof.

## **9. Trade Secret, Intellectual Property and Confidential Information**

- 9.1 “Confidential information” refers to the data and information, directly or indirectly, received, contacted, acknowledged, formed, created, or developed by Delta employees during the employment period due to the usage of equipment, technology, or resources of the Company or position or those being marked with text of “Confidential” or other similar texts and declared as confidential. Regardless whether such declaration is made in writing, whether it is completed or whether it may be applied or registered for patent or other intellectual properties. For example:
  - (1) Data or information concerning production, marketing, procurement, pricing, business, finance and personal affairs. Data regarding the requirements of existing and potential customers, as well as the employees, customers, suppliers and distributors of the Company. This includes other data in relation to operating activities and methods of the Company.
  - (2) Product formula, design and all related documents



- (3) Findings, concepts and ideas such as research and development plan, procedures, formula, creations and equipment or knowledge, technologies, know-how, design, diagrams and instruction.
  - (4) Other matters or data in relation to the operating of other activities of the Company and that general person engage in similar business or activities may not acknowledge.
  - (5) All ideas derived from contacting or acknowledging all data or information above.
- 9.2 Delta employees shall keep the Company's confidential information confidential and shall not deliver, inform, transfer or disclose to third parties by any method or announce to the public without receiving prior consent in writing from the Company or duly carrying out for performing Delta employees' duties and shall not utilize or use such information for oneself or third parties. This provision remains effective after the termination of employment.
- 9.3 All Delta employees should adopt proper protective measures, including those described below, for trade secrets and confidential information known by them or under their charge through their employment with the Company.
  - (1) Have a confidentiality agreement signed before disclosing with authorization any trade secret or confidential information to a third party and mark "Confidential" or other texts with similar meaning on the confidential data.
  - (2) Faithfully observe the clauses in the employment agreement and relevant Company requirements of the Company's Procedures for Trade Secret and Confidential Information Protection Keys and Management, and Global Information Security Policies.
  - (3) Adopt necessary and reasonable protective measures to prevent access to such trade secret or confidential information by unauthorized persons.
  - (4) Trade secret or confidential information shall only be disclosed to other Delta employees that required to know such information.
- 9.4 When performing their duties in the Company, Delta employees shall not quote or use any confidential information belongs to their or other parties without written authorization from their ex-employer. In addition, Delta employees must guarantee that they will not disclose confidential information of other parties to Delta employees or any third party.
- 9.5 For confidentiality obligations of the Company to third parties, Delta employees also agree to undertake the equivalent obligations as the Company. Delta employees will exert maximum due care to their obligations and the protection of trade secrets or confidential information from third parties to avoid matters of default. This provision remains effective after the termination of employment.
- 9.6 Regarding information (confidential or not) of the Company or third parties with business relationships held by Delta employee during their employment, Delta employees shall



return such information to the Company upon departure, and shall not destroy, alter or keep such information.

- 9.7 With the exception of the Company or the owner of confidential information announcing it to the public, the aforesaid confidentiality obligation does not end when a Delta employees leaves his/her job.
- 9.8 Delta employees may only search for and save information required by their work within the scope of their duties, and they shall manage relevant information in a secure manner according to the file management requirements of the Company within its validity period.
- 9.9 Delta employees shall make use of Delta's trademark, company name, business title, logo or slogan (collectively, the "Delta Trademarks") according to the Company's relevant regulations. Delta employees may not use Delta Trademarks on non-Delta products or services or for their own interests or authorize others to use Delta Trademarks without consent from the Company. Delta employees may not use trademarks, which are not legally authorized on products or services of the Company.
- 9.10 Delta employees may not, in person or procure others to, propose objection, cancellation, or argue for the efficacy of Delta Trademarks in any country, or, in person or procure others to, use, apply for, or register any trademark or company name equivalent or similar to Delta Trademarks on any goods or services in any country.
- 9.11 Delta employees shall duly comply with laws in relation to intellectual property, and the Company's Procedures for Patent management and other requirements related to the intellectual property of the Company, including relevant regulations and standard procedures for application, litigation and assets protection.
- 9.12 Delta employees are prohibited from obtaining the trade secrets or confidential information of others through spying, theft, coercion, enticement or other illicit means, or in any way stealing, plagiarizing, or taking possession of other's paper, work, research report, patent, proprietary technology, design drawings or other technological findings that result in the infringement of other's intellectual property rights.
- 9.13 All inventions, creations, technological findings, trade secrets and other intellectual properties conceived or generated by Delta employees during their employment with the Company using the Company resources belong to the Company.  
  
The Company may apply for relevant intellectual property rights. Delta employees should render full assistance and cooperation in related procedure.
- 9.14 Delta employees shall not attempt to access other's network, data, other accounts, or computer systems through hacking, password mining, stolen password or by any other means, or use unlicensed software.



- 9.15 Delta employees have the responsibility to comply with Copyright Act or copyright related regulations and shall refrain from copying, installing or using unlicensed software or work in the performance of their own or Company assignments.
- 9.16 Unless with the consent or authorization of the copyright holder, Delta employees shall not at own discretion reproduce, alter, reprint, adapt, extract, reverse engineer, or engage in other activities that infringe on the copyright of other's work in part or whole.
- 9.17 When releasing, publishing or making public news, information, (including information of cooperation plan, strategic alliances, investment relationship, competition strategy with others), products or documents of the Company, Delta employees shall obtain the prior consent of the head relevant departments and ensure that the release, publication or making public of such technology-related news, information, products or documents will not adversely affect the rights and/or interests of the Company or infringe on the trade secrets of the Company.
- 9.18 Delta employees shall not make false statement or disseminate any false information that would tarnish the good name or business reputation of the Company, or make any false statement or disseminate false information that would tarnish other's names, during the course of performance of their duties.

## **10. Respect Personal Privacy**

- 10.1 The Company collects different types of personal information of Delta employees according to the law, including personal identity verification information required to be provided by the employees or for the Company to process transactions, services, inquiry or request. Personal information collected and processed by the Company may be used for observing the requirements of laws or procure the effective business operations. For example processing matters requested by Delta employees, maintaining the relationship between the Company and Delta employees, helping the Company to maintain and improve the operation and service quality of the Company, and any other usages prescribed when collecting the personal information.
- 10.2 The Company may share the personal information of Delta employees with authorized personnel in connection with the above purposes. The Company may also disclose personal information of the Delta employees to third-party suppliers (in particular, allowing suppliers to perform certain website services for the Company, such as web hosting or maintenance services). In principle, the Company will not disclose this type of personal information to any third party, with the exception that the Company will be required to disclose this type of personal information when it considers laws/ regulations require it or to comply with the requirements of law/ regulations, including:
- (1) To comply with requirements of legal procedures of the government
  - (2) To comply investigate, or prosecute the criminal offense or attacks regarding the completeness of the Company's website or network technology
  - (3) To protect the rights, property or safety of the Company, website users or the public.



The Company is a multinational corporation that possesses offices, affiliated enterprises and suppliers in different jurisdictions, the protection to personal information upon international transmission shall be ensured through contracts, internal code of conducts, or other protective mechanisms.

10.3 The Company shall preserve the personal information of Delta Members within the period permitted by the law and for the purpose of no more than collecting or processing personal information. Furthermore, the Company may delete such personal information under the following circumstances.

- (1) When the personal information is not required for the original collecting or processing purposes
- (2) When no legal basis or legitimate reason available for the continual processing
- (3) When it is to comply with the legal obligations.

The company will respect Delta employees' rights to delete and review the personal information and consult others within the scope permitted by the laws.

## **11. Diversity, Fair Employment Opportunity and Respect**

11.1 The Company provides equal working opportunities with no discrimination regarding the ethnicity, nationality, region or social class, origin, lineage, religion, disability, gender, sexual orientation, family responsibilities, marital status, group membership, political affiliation, age or other status protected by the local laws or laws of other countries.

11.2 The Company commits to employ qualified people with disabilities or the vulnerable, to establish a diversified environment that makes all Delta employees feel at ease, inclusive and that they have been treated equally.

11.3 To ensure that all qualified personnel has a chance to develop in the Company, the Company employs Delta employees via public employment channels.

## **12. Discrimination and Harassment Prohibition**

12.1 Delta employees shall perform their duties with respect, not engage in harassment (including sexual harassment) and shall not resort to violence or other illegal conducts regarding their duties.

12.2 Harassment includes hurting others people physically, verbally and/or mentally or affecting their work performance by way of behavior, language and written texts or making them feel scared and disgusted or establishing a bullying, hostile or aggressive working environment.

12.3 Delta employees shall not take advantage of the business to engage in abnormal relationships with customers, suppliers and partners or other Delta employees or engage in harassment (including sexual harassment), discrimination (including race, gender, disability, religion discriminations), theft, threats or other illegitimate conduct.



### **13. Environment, Health and Safety of Working Premises**

13.1 The Company incorporates the good practices of occupational health & safety to its operations and complies with safety regulations for working premises to create a working environment excluding negative influences of drugs and alcohol.

The Company attaches great importance to the health and safety of employees and established procedures to ensure the working environment achieves the standards required by all relevant regulations, ensuring the safety at work for employees.

13.2 The Company shall observe the health and safety laws and regulations at the working venue during work. Delta employees shall also comply with the health and safety requirements of customers or when working on their premises or in their venues. When customers, suppliers, partners, contractors or third parties visit the Company's locations, Delta employees shall explain to them the applicable requirements for safety and health.

13.3 If there is suspicion regarding the following circumstances at the workplace or in the market, Delta employees shall report to the direct superior and health and safety officers immediately.

- (1) Being asked to engage in unsafe work
- (2) Being asked to engage in work that one has never received related training and may cause harm to oneself or others.
- (3) Finding others engaging in unsafe works
- (4) Unsafe vehicles, equipment under operation or working premises.
- (5) Injuries, sickness or emergencies occurred at the working premises including false alarms
- (6) Other health and safety issues

### **14. Using of Company Resources**

14.1 The Company provides working premises, furniture, stationery, office equipment and information technology resources to Delta employees to help the work of Delta employees. Delta employees shall duly manage such resources, meanwhile, carefully use and maintain, avoid losses, damages, wastes, misappropriation or illegal usages of resources.

14.2 Delta employees shall make the best of the Company's resources to maximize the interests of the Company. Unless permitted by the Company, Delta employees may not use the Company resources to engage in conducts irrelevant to the business or violate the interest of the Company

14.3 Delta employees are obliged to ensure the accuracy and completeness of the information and records (including account books, receipts, records, entries, capital and assets) owned, collected, used or managed by themselves and may allow the transactions and business dealings of the Company to be reflected appropriately and accurately in compliance with the relevant accounting standards and code of conducts.



- 14.4 The Company will not allow the existence of undisclosed or unrecorded capital or assets and it is forbidden to prepare false or misleading statements or records, entries, financial statements or other documents or intentionally conceal or disguise the actual transaction circumstance of the Company. Therefore, Delta employees shall avoid adding any information that intendedly conceals misleads or disguises the financial or non-financial transactions, results or actual balances in the account books or records of the Company.
- 14.5 Shall there be events of quality defects or recall regarding products of Delta that have exceeded the scope of general warranty or return material authorization (RMA) with significant influences, Delta employees shall notify the local legal affairs department immediately. Then, sign or negotiate the compromise contracts or agreement with customer or pay compensations or discounts to customers or arrive at compensation or reconciliation agreement with a third party (such as the supplier) after receiving the consent from the legal affairs department.
- 14.6 When Delta employees are participating in any contract negotiations on behalf of the Company, Delta employees shall ensure that they understand and observe the signing authorization regulations and relevant policies of the Company. Delta employees must only carry out negotiations within the authorization and business scope of the member granted by the Company and the member shall also obtain all required approval

## **15. Compliance with Environmental Protection Rules**

- 15.1 Delta employees should understand the Company's missions of "To provide innovative, clean and energy-efficient solutions for a better tomorrow" and related policies (including energy conservation and carbon reduction). Also comply with laws/regulations and Company rules, receive related training, and implement the Environment Safety & Health (ESH) policies in product design or plant operation in coordination with internal management system or the operation of CSR organization.
- 15.2 When discovering problems during work that constitute a violation of environmental, safety or health related regulations or Company ESH rules, or that could be potentially hazardous, Delta employees should proactively reflect the problem to their superior or relevant personnel through the established procedure and channel. Delta employees could also offer good ESH opinions or ideas for the reference of the Company.
- 15.3 Delta employees should promote the aforementioned ESH related commitments and policies of the Company among the stakeholders of Delta and communicate those matters with the stakeholders periodically to make continuous improvement and achieve maximum effect.

## **16. Training, Propagating, Disciplines and Whistleblower Channels**

- 16.1 The Company shall disclose its policy on business integrity in the internal rules, annual reports, Company website and other marketing materials and when appropriate, in the activities open to the public to ensure the Company's suppliers, customers or any other



business-related third parties may fully understand the Company's policy on business integrity and its rules.

16.2 The Company shall offer education and training for the implementation of the Code, allowing all Delta employees to understand the Code. Education and training shall be provided when all employees join the Company and review training shall be carried out every year. Employees who fail the test are required to receive training and take the test again in three months and repeat the process until they pass the test. The test results will be used as a reference in the performance review of Delta employees.

16.3 The Company and subsidiaries shall conduct investigations as to the specifics in the event of discovering or receiving reports about any allegation of Delta employees' dishonest behaviors. Relevant members shall cooperate in such investigation and provide relevant information. In the event that it is proved and confirmed that any Delta employees has violated the regulations of the Code, the Company may, in view of the severity of violation, mete out one or multiple disciplinary actions as described below. In accordance with the applicable local work rules, may hold the violating employee accountable pursuant to the local civil and /or criminal law.

- (1) Issuing a verbal or written warning as a reprimand and request that such breach of conduct cease immediately
- (2) Requiring the violating employee to receive training and testing of the Code again
- (3) Recording a warning or demerit against the violating employee.
- (4) Deducting performance bonus or demotion or dismissal from employment.
- (5) If the violation is of significant severity, the Company may terminate the employment agreement in accordance with the Labor Protection Act and the provisions of the employment agreement.
- (6) If the superior of the violating employee is found slack in supervision or was aware of the violation but decided to cover for the violator or not to report the matter, the superior will, in view of the severity of situation, be subject to a warning, demerit or dismissal from employment.

16.4 All Delta employees have the obligation to report the matter to any of the following persons/ units below and follow the grievance procedure in each region when they find that another Delta employee could be involved in activities that violate the law and the Code.

Mechanism for internal complaints (Delta employee's complaint)

- (1) Head of the unit where the employee belongs to
- (2) Email: [HR.GRIEVANCE.SEA@deltaww.com](mailto:HR.GRIEVANCE.SEA@deltaww.com)
- (3) Line ID: @DeltaTH
- (4) Suggestion box

Mechanism for external complaints (third-party complaint)

- (1) Opinion Box (PO Box 50, Bangpoo, Samutprakarn 10280);
- (2) Email: [Whistleblow@deltathailand.com](mailto:Whistleblow@deltathailand.com)



## 16.5 Investigation and confidentiality

Delta employees or external parties may specify the information of the reporting party on a reporting letter when reflecting or reporting the act of violation of another member, such as service unit, name and contact methods. The handling unit for the reporting shall exert strict confidentiality regarding the above-mentioned information and only when required by the investigation may it disclose such information to designed personnel. It will adopt reasonable preventive and protective measures to avoid the reporting party encountering retaliation or improper treatment.

## 17. Edition History

The first edition in 2007

The first amendment in 2014

The second amendment in Jan 2017

The third amendment in Oct 2019

The fourth amendment in Sep 2020