

Code of Conduct

October 17, 2017

Burapa Prosper Co., Ltd.

Introduction

Burapa Prosper Co.,Ltd. is determined to implement business policy in accordance with legislations, relevant regulations and business ethics in the workplace. In order to ensure concrete implementation, the company has issued the "Code of Conduct" for executives, directors and staff, which provides a guideline on how they should conduct themselves and carry out their duties with honesty, integrity, transparency while adhering to morals and ethics. This Code of Conduct shall be adopted by all parties for the company's sustainability, progress, prosperity and society's acceptance and recognition.

This Code of Conduct is given in written form and is thoroughly instructed to, comprehended by, and communicated across the organization to the directors, managers and staff.

Hereinafter, the term "staff" is used and it refers to permanent employees, temporary employees and employees under specific contracts.

All executives, directors, and staff are required to study, understand and follow this Code of Conduct with earnestness. This Code of Conduct is considered a part of "Working Regulation" of the company.

Ms. Sathaporn Paisanburapa

Managing Director

17 October 2017

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Code of Conduct

Vision and Mission

Vision

Burapa Prosper Co., Ltd. strives to be a leading ASEAN producer of rice flour and rice starch with preferred brands outstanding for quality and innovation.

Mission

Creating Value Innovatively

Core Values

Burapa Prosper Co.,Ltd. is committed to operate business according to our mission with the target of being the leader in producing high quality products which are able to satisfy the requirements of customers and consumers alike. We conduct business with responsibility towards the society and environment, keeping in mind the best interests of the stakeholders, as well as emphasize sustainable growth of the organization.

Burapa Prosper 's staff shall possess 5 core values as follow:

1. Passion : The staff are passionate about their works and are self-motivated to keep learning and improving. Work with dedication and determination for ultimate success.
2. Teamwork : Working as a team, the staff work with the company's best interest as the goal. The staff shall fully cooperate and work together harmoniously both within and outside of their departments.
3. Quality : The company emphasize both the quality of people and work. Staff must have the awareness to produce highest quality products for customers.
4. Moving forward : Staff must be open to changes, always have a forward-moving attitude, be willing to adapt and develop to grow with the company.
5. Integrity : Staff shall be honest in performing their duties and be transparent and accountable for their actions.

Section 1 Policy on Business Operation

Burapa Prosper Co., Ltd. is committed to operating our business following ethical principles, laws, food quality and safety policies, and social and environmental responsibility policies under proper business ethics. The Code of Conduct is specified for all executives, directors, and staff based on the seven main principles as follow:

1. Accountability
2. Transparency
3. Ethical behavior
4. Respect for stakeholders' interests
5. Respect for the rule of law
6. Respect for international norms of behavior
7. Respect for human rights

Section 2 Policy on Treatment of Stakeholders

2.1 Policy on Treatment of and Responsibility to Shareholders

2.1.1 All staff are required to perform their duties honestly, and every decision must be ingenuously made for the maximum interest of the entire shareholders.

2.1.2 Actual and complete situation of the company as well as its future outlook, regardless of whether it is positive or negative, together with adequate supporting information must be regularly reported to all shareholders.

2.1.3 Adequate and complete financial information must be revealed and details on overall operation and necessary financial documents must be accurately, transparently and fairly given to all shareholders.

2.1.4 Company's confidential information must not be improperly disclosed to others.

2.1.5 Any conduct which causes conflict of interest to the company is prohibited.

2.1.6 If any suspicious, dishonest or fraudulent actions or events are suspected, the staff must notify the company immediately. The company provides a channel for filing complaints and reporting of misconduct which can be done through: Department of Human Resources and Administration, Burapa Prosper Co., Ltd. 236, 238 Bangsaenlang, Saensuk Sub-district, Muang ChonBuri District, ChonBuri Province 20130 Tel. 038-391503 Ext. 56 and 57 According to the company's regulation on complaint reception, response to the complaint and and complainer's protection must be provided and the follow-up of management of the complaint must be systematically and fairly informed to the complainer.

2.2 Policy on Treatment of Customers, Consumers, and Product Quality

2.2.1 The company is committed to making the customers satisfied and confident

In our products and services by giving a high priority to research and development in order to create products that are of high quality that meet customers' varying demands. Special attention is also given to stringent quality control to ensure that the production processes meet international product quality and safety standards.

2.2.2 The company is determined to develop and deliver high quality products that meet customers' needs which are produced with modern and highly efficient technology under stringent quality control measures and fair trade conditions.

2.2.3 Correct, adequate, and up-to-date information about products and services must be provided for customers' decision making.

2.2.4 Customers' private information must be kept confidential and must not be improperly used for personal interest or interests of other parties involved.

2.2.5 Customers' needs must be responded to in an honest and timely fashion to

ensure their highest satisfaction.

2.2.6 A channel for reception of complaints and enquiries from customers must be provided and the complaints and enquiries managed promptly and transparently. In addition, customer's satisfaction evaluation must be conducted for the purpose of improving and developing company's products and services.

2.2.7 Any giving of benefits to customers with the intention to dishonestly or illegally acquire them from business competitor(s) is prohibited.

2.3 Policy on Treatment of Creditors

2.3.1 Creditors shall be equally and fairly treated on the basis of fair interests for both the company and creditors.

2.3.2 Contracts, agreements or conditions made with creditors must be strictly followed. In an event that any part of the contract, agreement or condition is not able to be fulfilled or followed, the company must inform the creditor in advance so that both parties can work out the solution together to avoid potential loss.

2.3.3 Demanding, receiving or giving of any benefit which is deemed commercially dishonest shall not be done when negotiating with creditors.

2.3.4 Accurate and complete financial information must be punctually and regularly submitted to creditors.

2.4 Policy on Treatment of Staff

2.4.1 Treats all staff equally and fairly without discrimination and either direct or indirect violations of individuals rights and freedom. Appropriate benefits and rewards shall be fairly given to the staff according to their knowledge, competency, responsibilities and work performance without discrimination based on race, gender or sexual orientation, disability, and supervisor's

personal attitude.

- 2.4.2 Safety of workplace environment must be maintained for the lives and properties of staff.
- 2.4.3 Job appointment, rotation, reward and punishment to any staff must be ingeniously done and on knowledge, competency and appropriateness basis.
- 2.4.4 Develop of staff's knowledge, competency and skills shall be emphasized and development opportunities shall be given to all staff evenly and regularly. Teamwork shall also be encourage among staff.
- 2.4.5 Laws and regulations pertaining to staff shall be strictly followed.
- 2.4.6 Attention shall be given to opinions and suggestions which are based on professional knowledge of the staff.
- 2.4.7 Equal and fair attention shall be given to every staff member's complaints, opinions and suggestions, which are to be taken seriously and responded to in a systematic, fair and transparent manner. This includes providing complainer's protection and rectification of the issue(s) pointed out for greatest benefits of all parties involved and better relationships in the workplace.
- 2.4.8 Rapport and solidarity shall be maintained and enhanced and full cooperation and coordination shall be provided by all staff whenever needed.
Respecting of others' rights in the same organization shall be encouraged.
- 2.4.9 Respecting the privacy and personal rights of all its staff. The company collects, uses and processes only staff's personal data which are necessary for business or legal purposes. These personal data shall be maintained and kept confidential by the company and disclosure of these information can only be done by authorized parties on a need-to-know basis only.

- 2.4.10 Any negative or damaging criticisms and threats which may inflict psychological discomfort/sufferings on others and which are considered disrespectful to others' rights are prohibited.

2.5 Policy on Treatment of Business Competitors

- 2.5.1 Any conduct of the company shall be under fair and ethical competitive rules.
- 2.5.2 Any unethical or improper attempt to obtain competitors' confidential information is prohibited.
- 2.5.3 Discrediting competitors without evidence or supporting fact is prohibited.
- 2.5.4 Any action that is considered an infringement on competitors' intellectual property is prohibited.

2.6 Policy on Treatment of Management Team

- 2.6.1 Ensure strict compliance to the contents of the laws and regulations issued by the management team.
- 2.6.2 Avoid any action that facilitates, promotes or leads to non-compliance of the laws and regulations.
- 2.6.3 Cooperate with the management team and report any violation or non-compliance of the laws and regulations.

2.7 Policy on Self-Conduct and Treatment of Co-workers

- 2.7.1 All staff shall perform their duties honestly, transparently and earnestly.
- 2.7.2 All staff shall respect the rights of co-workers as well as the management team. Damaging and unproductive criticisms and claiming of another's work as one's own are prohibited. Threatening of others which causes emotional discomforts or psychological sufferings, and which is considered disrespectful to others' rights shall not be done.
- 2.7.3 Supervisors and commanders shall behave as role models for their subordinates; meanwhile, the latter shall not display any conduct that is

considered disrespectful towards their superiors.

- 2.7.4 All staff shall be disciplined and conduct themselves according to the company's rules and regulations as well as commonly observed customs and traditions whether or not they are specified in writing.
- 2.7.5 Rapport and solidarity among staff shall be concertedly cultivated and maintained.
- 2.7.6 Expression of opinions to the press or outsiders or any conduct which may negatively affect the image and reputation of the company, or which can later pose problems to the company are prohibited.
- 2.7.7 Ethics and morality shall be maintained. All staff shall not threaten, violate or insult their co-workers either verbally or physically.

2.8 Policy on Treatment of Society and Community

- 2.8.1 The company is committed to protecting the environment and placing great importance on pollution prevention and waste reduction which could have negative impacts on the environment as well as being responsible for conserving local customs and traditions.
- 2.8.2 Regularly promote and organize socially and environmentally beneficial and constructive activities.
- 2.8.3 Prevent the occurrence of accidents and ensure that the amount of waste discharge is within acceptable standards.
- 2.8.4 Respond quickly and efficiently to any incident that results from company's operation which affects the environment and community and provide full cooperation to government officials and related organization(s) with honesty and transparency.

Section 3 Policy on Financial Report, Internal Control System, and Internal Audit

- 3.1 The management team of the company is directly responsible for putting

together accurate, complete, on time, and credible financial reports

including

quarterly and annual financial statements. These reports shall be prepared according to generally accepted accounting standard.

- 3.2 Effective Internal Control System and Internal Audit shall be set up to ensure that the company complies with relevant laws and standards under the audit from internal auditor and verification by auditing committee.

Section 4 Policy on the Use and the Preservation of Company's Properties

Company's properties refer to both tangible and intangible properties such as movable and immovable properties, technology, production formulas, title deeds, patents, copyrights, confidential information including business plan, financial estimation and human resource information.

- 4.1 All staff have a duty to be responsible for optimal utilization of the company's properties and shall not use them for personal benefit as well as be responsible for preserving the company's properties from damages, losses, and to effectively utilize them.
- 4.2 Various information and data are the company's properties which are available to the staff to be used for the company's business purpose only. Staff are prohibited from using them inappropriately or for matters unrelated to the company's business and they must not disclose or exploit the company's confidential information.
- 4.3 Company's intellectual property, which includes patents, sub-patents, copyrights, trademarks, food recipes, formulas, knowledge, or any other information are all company's valuable assets. All the staff have a duty to safeguard the company's intellectual properties by not allowing them to be used or distributed without permission. Extreme caution must be taken to

ensure that there will be no violation of intellectual property rights when using existing works or information that are rightfully others' within the company.

Section 5 Policy on Procurement and Anti-Corruption

- 5.1 The company shall conduct itself with suppliers in a business-appropriate manner only. Care must be taken to avoid allegations of preferential treatment or inappropriately close relationship with any particular supplier that can potentially lead to unfair procurement or negotiations.
- 5.2 Accurate, complete and straightforward information shall be given to suppliers without rushing them to make decisions based on false understanding or correct but incomplete information.
- 5.3 To avoid partiality or allegations of favoritism, gifts, benefits and invitations to any party or reception regardless of whether it is organized for an individual or group of individuals in the company must not be accepted. This includes invitations to attend educational trips in which the expenses, either whole or partial, are paid by the supplier(s). The company must also not accept financial support from any supplier for holding internal activity.
- 5.4 Bribes, rewards or any types of benefits for an individual or group of individuals must not be asked or expected from suppliers under any circumstances.
- 5.5 Only supplier(s) whose qualifications and competency are agreeable with the company's requirement shall be invited to submit for a tender. If an estimate is required for the purpose of expense budgeting, this must be clearly informed to the supplier in advance.
- 5.6 Clear and correct criteria and information about a tender shall be fairly given to all bidders. If any additional information is requested by and given to one bidder, it must also be given to other bidders even though they do not

request for it. If a tender bidder is allowed to postpone the date of document submission, a new date of submission given to that particular bidder must also be informed to other bidders immediately.

- 5.7 The information gained from quotation submitter(s) or bidder(s) shall be kept confidential. Price quoted and technical information obtained from one submitter or bidder shall not be disclosed to other submitter(s) or bidder(s).
- 5.8 Transparent, fair, and honest procurement without unethical interference shall be practiced.
- 5.9 Human resource management that is transparent, verifiable and non-discriminating shall be formed.

Section 6 Policy on Conflict of Interest

- 6.1 All directors, managers, and staff shall avoid any action which causes conflict of interest to the company, be it the result of company's business interactions or connections or taking advantage of their positions as directors, managers or staff or the information obtained from their positions, for their own personal benefits. This includes being involved in competing business or other works apart from their duties assigned by the company or buying/selling of company's assets. All staff shall insist on right, legal and fair conduct and shall not engage in any malpractice or neglect their duties either for their own or another's benefit or with the intention to cause damage to others. Staff shall also not seek personal gain that is in conflict with company's and customers' interests. Business decision making and operations must be on the basis of maximum benefits for the company.
- 6.2 All staff must report incidents or possible incidents of conflict of interest promptly to the management.
- 6.3 All directors and managers are required to disclose information related to their

own interests and other related parties' interests so that the company can examine its business transaction(s) which may be considered conflict of interest and make decisions for the company's benefit as a whole.

Section 7 Policy on the Use of Information Technology and Communication

- 7.1 The company encourages the use of the internet for work purposes. Any action that disturbs or interferes with others' computer systems and internet in the workplace are prohibited.
- 7.2 All managers' and staff's usage of computers and information technology shall be in accordance with Computer-Related Crime Act B.E. 2550.
- 7.3 All staff must not use the company's computer system for the distribution of information which is considered immoral, illegal or against customs and traditions or any action which poses damage to national security and safety.
- 7.4 Only licensed computer software and applications shall be used in the company. Installation and use of illegal computer software and applications are strictly prohibited.
- 7.5 Any damage, correction, adjustment or addition, either partially or entirely, to computerized information or computer system is prohibited.
- 7.6 One's username and password shall be kept confidential. They are not allowed to be distributed, shared or disclosed to others.

Section 8 Policy on the Exercise of Political Right

- 8.1 Managers and staffs shall exercise their rights, which is their civil duty as specified in the Constitution and other related laws.
- 8.2 All staff shall abide by Constitutional Monarchy. They are all entitled to political rights but shall not take part in being a committee of any political party or a representative in any public activity which may mislead the public to understand that the company is partial towards or is involved with one

particular party.

8.3 All managers and staffs are rightfully allowed on their own behalves, but not on behalf of the company, to participate in any political activity outside of their working time. In addition, they are not allowed to use the company's resources to support any political activity, political party or politician, either directly or indirectly. Neither is any political agent allowed to make use of company's resources or projects for political purposes.

8.4 All managers and staff must not use their power and positions to persuade, pressure or force their co-workers or subordinates to support any political activity, political party or politician, either directly or indirectly.

Section 9 Enforcement and Punishment

All executives, directors, managers and staff are required to study, understand and strictly follow this Code of Conduct.

Any member of the staff who has any doubts about the guideline detailed in this Code of Conduct shall seek advice from his/her supervisor/commander. Any staff who violates any part of this Code of Conduct or allows violation by his/her subordinates(s) will be subjected to disciplinary punishment which may include termination of employment, compensating for damages caused, and civil or criminal punishment.

Section 10 Implementation on Product Quality, Food Safety, and Environmental Responsibility

The company strives to elevate its food production processes so that they are in line with the laws related to food safety as well as market's and customers' demands under specified quality management standards including Good Manufacturing Practice (GMP), Hazard Analysis and Critical Control Point (HACCP) and British Retail Consortium (BRC). In addition to quality control and food safety, the company's knowledgeable and experienced management and

operation teams also give a lot of importance to energy saving, social and environmental responsibility, maintenance of labor standard and occupational hygiene and safety issues. The company has continuously been putting a lot of effort into conducting research, developing and improving its personnel, machinery, production processes and services to constantly elevate its operation.

The Company shall review the Code of Conduct every 2 years to keep it up-to-date and relevant to the circumstance and business environment that may have changed.

Effective on 17 October 2017.