

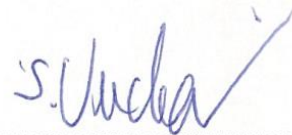
Policies and guidelines on
CONFLICT OF INTEREST POLICY

This document is effective from March 1 , 2023 onwards.



Mr. Pibulsak Atthaborwornphisarn

Chairman of the Audit Committee



Mr. Veerachai Suteerachai

Chairman of the Board

Introduction

This Conflict of Interest Handbook has been prepared to enhance communication and increase knowledge about conflicts of interest among personnel in the organization. It provides guidelines for reporting conflicts of interest and enables employees and executives to disclose information about them. The aim is to support the internal control and internal audit systems, making them more efficient.

The directors and executives of Asia Metal Public Company Limited sincerely hope that this manual will be useful to all operators and those involved, including those who are interested in further employment opportunities.

List of contents

| Subject | Page |
|---|------|
| 1. Importance | 1 |
| 2. Purpose | 1 |
| 3. Definition | 1 |
| 4. Elements of Conflict of Interest | 1 |
| 5. Duties and Responsibilities | 1-2 |
| 6. Conflict of Interest Guidelines | 2 |
| 7. Training | 2 |
| 8. Related Policies | 2 |
| 9. Policy Review | 3 |
| 10. Form and Scope, including Examples of Events that may cause Conflicts of Interest | 3 |
| 11. Penalties for Offenders | 4 |
| 12. Procedures for Reporting a Conflict of Interest | 4 |

Policies and Guidelines on Conflicts of Interest

1. Importance

Asia Metal Public Company Limited is committed to conducting business with honesty. In accordance with good corporate governance principles, business-related decisions and actions must be made with transparency, prudence, and caution to avoid damage, including creating credibility and providing the highest benefit to the Company.

2. Purpose

To provide directors, executives, and employees with guidelines for performing their duties with honesty, transparency, without seeking personal benefits and/or related persons, and to avoid conflicts of interest that may arise with affiliates of Asia Metal Public Company Limited.

3 . Definition

Conflict of interest is when "Directors, executives, and employees who receive wages, receive the salary of the company, or the company is responsible for all transactions for the benefit of the company or the main employer. If anyone uses their authority to take advantage of the work or that transaction, whether it's for yourself, personally, or relatives, friends, causing the company to not receive full benefits or damage to the company."

4. Elements of Conflict of Interest

Situations or actions that are considered a conflict of interest must contain the following components:

1. A person holding a position with responsibility or authority related to the interests of the department/division or the public.
2. The state of self-interest interferes with decision-making or discretion.
3. Making decisions for personal benefits rather than the collective.

5. Duties and Responsibilities

5.1 Committee

1. Set policies and guidelines for managing conflicts of interest.
2. Supervise the implementation of the policy in a concrete manner.

5.2 Executives

1. Provide appropriate regulations within the context of the company in accordance with the policies and practices of AMC, including the requirements and laws of the country in which each company operates.
2. Establish a structure for responsible persons such as departments/divisions or responsible persons to supervise and control the operation to be in accordance with the regulations.
3. Supervise the implementation of policies, guidelines, and regulations, as well as identify ways to develop the improvement, to make the implementation more efficient, and ensure that the results of operations are reported in accordance with policies, guidelines, and procedures.

5.3 Responsible person

1. Communicate and give advice to personnel to comply with policies, guidelines, and regulations to operate correctly.
2. Responsible for the operation in accordance with the regulations.
3. Collect and keep the reports of conflicts of interest.
4. Report compliance with regulations to the Board of Directors or executives.

5.4 Employees

1. Comply with the policy, guidelines, and regulations to operate correctly and strictly.
2. Report information or notify a clue to the responsible department/division or responsible person or channels for whistleblowing as specified. If witnessing or knowing of a conflict of interest event or that may have a conflict of interest.

6. Guidelines on Conflict of Interest

1. Directors and personnel should avoid any action that may cause a conflict of interest with the Company and its subsidiaries and should not act in any manner that is contrary to the interests of the Company and its subsidiaries or seek personal benefits and/or those involved.
2. Do not disclose and use inside information for personal gain and/or related persons.
3. In the event that directors, personnel, or related persons are involved or are shareholders in the business that may have benefits or cause a conflict of interest with the Company, they must notify the audit committee or the responsible person acknowledged in writing.
4. If you witness any action of the conflict of interest policy, you can report it through the whistleblowing channel at “IA@asiametal.co.th or Secretary@asiametal.co.th”.
5. In the event that employees have conflicts of interest, i.e., a conflict of interest between their personal interests and the benefit of the company or related parties such as customers, etc.

The following guidelines should be followed:

- 5.1 **Disclose** to the Executive Committee and the employees of the company who are responsible for any work or matter where employees have conflicts of interest.
- 5.2 **Refusal** to participate in decision-making or work in which the employees have conflicts of interest.
- 5.3 **Resolve the status of the position or job duties that have a conflict of interest (removal)**, such as resigning from the conflicting position, etc.

7. Training

The Company provides training on conflicts of interest for directors, executives, and employees of the company.

8. Related policies

1. Policy and Guidelines on Anti-corruption
2. Business Ethics and Conduct Manual

9. Review of good governance policy

The Board of Directors of AMC will jointly review this policy at least once a year.

10 . Format and scope Including examples of events that may cause conflicts of interest.

1. Accepting gifts or other benefits for personal gain and/or related persons from business partners.
 - Any gift or benefit compared to the market price is over 2,000 baht must be registered and reported to the supervisor.
 - If the gift or benefit has the market price between 2,001 - 20,000 baht and employees are required to receive it to the company by the chief's discretion whether it is appropriate for the employees or giving the property of the Company to the public for used and/or as appropriate the occasion. The company may consider allowing that employee to retain items on a case-by-case basis such as job transfer or job promotions gifts, retirement or resignation gifts, etc.
 - Use the Company's internal information for one's own benefit and/or related persons.
 - Do not disclose or use inside information of the company that you know from performing duties or conducting any transactions for their own benefit.
2. Use the company's assets for personal benefit.
 - Do not use company assets such as assets, time, funds. intellectual property secrets or information, computer software and business name for outside activities or business without approval.
3. Bring the company's personnel to use in personal's work.
4. Get a part-time job or do your own business during the company's business hours.
 - Persons who accepting the tasks or positions outside the departments / divisions must be approved by an authorized person and not to use the company or their position in the company to be used as a reference to promote outside activities.
 - Persons who accepting the tasks or positions outside the departments / divisions must regularly report their performance to the authorized person who assigned to perform such duties, including proposing to seek approval from the authorized person before making any decision or taking any action that may affect the company.
5. Agree the contract or operate a business that has an interest in that business either directly or indirectly.
6. Take a position as a director, consultant or employee in a company of a competitor, customer or business partner.
7. Do personal business with the Company's business partners while holding the position which is involved in the selection of such business partners.
8. Participate in the selection process, promote or evaluate the performance of employees with whom they have a personal or financial relationship.
9. Persons in the family of personnel conducting trades or conducting any transactions with the Company where such personnel as contractors.
10. Offer or accept any personal loan offers, guarantees, discounts or benefits from business partners or competitors.
11. Consideration of permissions granted to third parties.
12. Other actions that cause benefits to oneself or others.

11 . Punishment for offenders

1. In the event that there is a complaint or it appears that executives or employees violate orders in accordance with measures to prevent conflicts of interest. It is considered a disciplinary offense and proceed in accordance with the rules or regulations that the company has announced.
2. In case of problems following this instruction, the directors shall be the final decision. The decision of the director is final.

12. Procedures for Reporting a Conflict of Interest

