



Code of Conduct

At Pafil International Co., Ltd, we believe acting ethically and responsibly is not only the right thing to do, but also the right thing to do for our business. The Pafil International Co., Ltd Code of Conduct ensures that we hold ourselves and how we do business to a high standard, allowing us to fulfil our obligations to the many stakeholders we serve.

We set expectations high for both practical and aspirational reasons: Our commitment to the highest standards helps us employ great people, build great relationships, and attract fruitful and sustainable partnerships. Respect for our stakeholders, and for each other are fundamental to our success, and is something we need to support every day.

Who our Code of Conduct applies to

We expect all of our employees to know and follow our Code of Conduct. Failure to do so could result in performance management, disciplinary action, including termination of employment. We expect Pafil International Co., Ltd contractors, clients, and others who may be temporarily assigned to carry out work or services for Pafil International Co., Ltd, to follow the Code in connection with their work for us. Failure of a Pafil International Co., Ltd, contractors, clients, or others to follow the Code can result in termination of their relationship with Pafil International Co., Ltd.

What If I Have a question relating to the Code of Conduct or Concern?

You can contact your manager or Human Resources representative. You can also submit a question or raise a concern of a suspected violation of the Code of Conduct or any other Pafil International Co., Ltd policy through the Human Resources Manager. If you believe a violation of law has occurred, you can always raise that through the Human Resources Manager or with a government agency.

Retaliation not tolerated

Pafil International Co., Ltd will not tolerate retaliation against any employee here at Pafil International Co., Ltd who reports or participates in an investigation of a possible violation of our Code of Conduct, policies, or the law. If you believe you are being retaliated against, please contact the Human Resources Manager.

Workplace Environment

Pafil International Co., Ltd promotes equal opportunity in its hiring practices, makes recruiting decisions based solely on job-related criteria. Pafil International Co., Ltd does not employ persons under the age of 18. At Pafil International Co., Ltd we treat each other with respect and dignity. This means that all people are entitled to work in an environment that is free of harassment, bullying and discrimination.



Harassment, bullying and discrimination take many forms, including:

- Unwelcome remarks, gestures or physical contact
- The display or circulation of offensive, derogatory or sexually explicit pictures or other materials, including by email and on the Internet
- Offensive or derogatory jokes or comments (explicit or by innuendo)
- Verbal or physical abuse or threats

Human Rights

Pafil International Co., Ltd supports and respects human rights consistent with the Universal Declaration of Human Rights. We do not tolerate any form of workplace discrimination, harassment or physical assault, or any form of child, forced, or compulsory labour. We expect our employees to avoid complicity in human rights abuses, and to uphold relevant international standards. We expect our business partners, including contractors, suppliers and clients, to respect and comply with international human rights standards, or one of an equivalent standard.

Diversity

Pafil International Co., Ltd actively creates and promotes an environment that is inclusive of all people and their unique abilities, strengths and differences, and promotes diversity as a strategic and competitive business advantage for the company. As we grow, embracing diversity in every aspect of our business, from the way we work together to the way we procure goods and services, is important to our long-term success. We respect diversity in each other, our customers and suppliers and all others with whom we interact.

Workplace Health and Safety

Employees, contractors and others are expected to follow all safety rules and regulations; cooperate with those who enforce these rules and practices; take necessary steps to protect themselves and other persons; attend required safety training; and report immediately all accidents, injuries and unsafe practices or conditions.

Quality and Control

Pafil International Co., Ltd commitment to quality means that we take steps to protect our product. Employees, contractors and others are expected to follow all proper procedures relating to the storage, handling, transport and service of product; by working to ensure clean, sanitary and safe conditions; and by continually exploring ways to maintain and improve Pafil International Co., Ltd quality standards and practices. Please notify your manager immediately if you become aware of anything that suggests that a product, process or situation may pose a danger to health or safety.



Substance Abuse and Weapons

Pafil International Co., Ltd has strict standards regarding substance abuse and weapons. Employees, contractors and others are not permitted to use or possess alcoholic beverages on company property, except where alcohol is specifically permitted at Pafil International Co., Ltd social event. Employees, contractors and others also may not use or possess illegal drugs or controlled substances on Pafil International Co., Ltd property or while you are engaged in any job-related activity.

Employees, contractors and others may not report to work under the influence of alcohol, illegal drugs or controlled substances. Employees, contractors and others may not have or possess any weapon while in a Pafil International Co., Ltd place of business or operation. Pafil International Co., Ltd takes its rules regarding workplace health and safety very seriously. It is essential that all employees, contractors and others understand and follow them.

Wages and Salary

Pafil International Co., Ltd is committed to following all applicable wage laws and regulations in accordance with the appropriate award and qualifications, role and responsibilities. To help ensure that all work performed for Pafil International Co., Ltd is compensated correctly, hours worked are recorded in a payroll system, to which all employees and contractors have access to with unique login ID and password. Wages are paid fortnightly directly via bank transfer, a pay summary is available online via the payroll system for each pay period, which employees and contractors can access via their unique login ID. Any discrepancy with a pay summary should be alerted directly to the employee or contractor direct report or Human Resource Manager to take appropriate action to resolve.

Conflicts of Interest

A conflict of interest exists when a personal interest or activity interferes or appears to interfere with the duties that a person performs at Pafil International Co., Ltd. When an employee, contractor or other is in a situation in which competing loyalties could cause a person to pursue a personal benefit for the person, friends, or family at the expense of Pafil International Co., Ltd or our affiliated parties, the employee, contractor or other may be faced with a conflict of interest. Potential conflicts of interest must be disclosed to the direct manager, Human Resource Manager or the Director.

Some examples which conflicts of interest may arise:

- Being employed by or operating an independent, including consulting, that does or desires to do business with Pafil International Co., Ltd or that competes with Pafil International Co., Ltd (for example, working as an independent broker supplying the same industry and or product as Pafil International Co., Ltd)

PAFIL INTERNATIONAL CO., LTD
99/5 MOO 7
RAWAI, MUEANG PHUKET 83130 THAILAND
TEL & FAX +66 76 641 038



- Making a substantial direct investment in such a business (by you or a member of your immediate family)
- Acting on behalf of anyone besides Pafil International Co., Ltd in any transaction with Pafil International Co., Ltd (for example, helping someone sell products and/or services to Pafil International Co., Ltd clients)
- Engaging personally in transactions in which Pafil International Co., Ltd has an interest

Gifts and Entertainment

Accepting gifts, entertainment, and other business courtesies from a Pafil International Co., Ltd competitor or business partner can easily create the appearance of a conflict of interest, especially if the value of the

item is significant. A gift should not be accepted or given if it might create a sense of obligation, compromise your professional judgment or create the appearance of doing so. In deciding whether a gift is appropriate, you should consider its value and whether public disclosure of the gift would embarrass you or Pafil International Co., Ltd

Acceptance of inexpensive non-cash gifts is permissible generally speaking. In addition, moderate business meals and entertainment with clients and invitations to attend local sporting events and celebratory meals with clients can be appropriate aspects of Pafil International Co., Ltd business relationships, provided that they aren't excessive and don't create the appearance of impropriety. Management approval must be provided in writing before accepting any gift or courtesy.

Where rewards from a current or potential client or supplier create any obligation or expectation that you will give preferential treatment to the person or company offering the reward, the reward is improper and must be refused.

Intellectual Property and Securities

Employees, contractors and others may become aware of significant and confidential information about Pafil International Co., Ltd business, often called Material Information. Employees, contractors and others may not share or sell Pafil International Co., Ltd Material Information or any other security on the basis of this information. In order to avoid any potential problems, you should interpret the term Material Information broadly.

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Some examples of Material Information include:

- Financial information
- The development of new products and/or services
- A proposed acquisition, joint venture or merger
- Government investigations
- Changes in key personnel

During employment/or working with Pafil International Co., Ltd in anyway including all employees, contractors and others, gain knowledge and information that belongs to Pafil International Co., Ltd or intellectual property, commonly referred to as "IP". Employees, contractors and others are trusted with maintaining the confidentiality of this valuable information. Pafil International Co., Ltd intellectual property should be used only for company purposes and should not be disclosed to anyone outside of Pafil International Co., Ltd.

Confidential information includes things such as business and marketing plans, internal company communications, reporting, existing and future product information and supplier and client information, including the supplier and client intellectual property a person working with Pafil International Co., Ltd may come into the knowledge of by doing business together. Pafil International Co., Ltd information should be

used only for company purposes and should not be disclosed to anyone outside of Pafil International Co., Ltd.

Only those individuals who truly need to know the information to conduct their business, appropriate to position and roles, should have access to confidential information as appropriate. If an employee, contractor or other leave Pafil International Co., Ltd, you must return all company materials and property, and any copies that may be in the possession of.

Confidential information should:

- Be stored in a secure place, such Pafil International Co., Ltd secure network, and not stored on personal laptops, tablets, phones or any other personal electronic device.
- Be clearly marked as confidential



- Not be sent to unattended fax machines or printers
Some basic rules to follow:
- Do not bring any material from prior employers to Pafil International Co., Ltd
- Do not accept or use anyone else's confidential information (or agree to maintain anyone's information in confidence)
- Do not solicit confidential information from another company's present or former employees or suppliers
- Do not engage in espionage; be transparent in obtaining information about the marketplace

Other Intellectual Property

The Employee, contractor or other hereby assigns to Pafil International Co., Ltd all rights, including, without limitation, copyrights, patents, trade secret rights, and other intellectual property rights associated with any ideas, concepts, techniques, inventions, processes, works of authorship. This work product is Pafil International Co., Ltd property if it is created or developed, in whole or in part, on company time, as part of an employees, contractors or others duties or through the use of company resources or information. To ensure that Pafil International Co., Ltd receives the benefit of work done by outside consultants, an appropriate written agreement must be in place before any work commences.

Reporting Breaches of the Code of Conduct

Employees, contractors and others working with Pafil International Co., Ltd, are required to comply with this Code of Conduct and report any conduct that may be in breach of the law, this Code, or any other Pafil International Co., Ltd policies or procedures.

Any reports will be taken seriously and investigated appropriately by Pafil International Co., Ltd. It is important that all reports are based on truth and fact and in good faith. If an employee, contractor or other makes a report in good faith, this person will not be disadvantaged personally or in their employment, even if the conduct that is reported is later found not to be in breach. If an employee, contractor or other makes an intentionally false or malicious report, this person may find themselves in breach, and therefore dealing with the consequences that follow.

When reporting a breach, it should be raised through the employee, contractor or other direct line manager or Human Resources Manager.