

Code of Conduct

Univentures Public Company Limited
and Subsidiaries

(Amended Edition 2017 - 18)



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INTRODUCTION

Univentures Public Company Limited and its subsidiaries (“UV Group”) adhere to business practices and business operations under the laws, regulations, and requirements of relevant regulatory bodies and also to good corporate governance policy in order to ensure that business operations of UV Group are proceeded with transparency, fairness, responsibilities to society and environment, and to oversee rights of all stakeholders equally. In this regard, the Company has established the Business Code of Conduct which has been regularly reviewed for the directors, executives, and employees of UV Group to adhere as guidelines in order for business operations to be efficient, achieve vision and mission and obtain credibility from shareholders, investors, and stakeholders. All directors, executives, and employees of UV Group hold responsibilities to sign their acknowledgement and strictly abide by this Business Code of Conduct.

OBJECTIVES

1. To inform directors, executives, and employees of UV Group on standard business practices expected by the Company with clear guidelines.
2. To use as guidelines that align with corporate governance policy and code of conduct set by the Company.
3. To increase efficiency and effectiveness in business operations, support UV Group to achieve vision and mission that it specifies, and obtain credibility from stakeholders.

DEFINITION AND MEANING

1. Ethics	Virtuous conducts that should be abided which are habitually adhered and are characteristics or moral behavior that are accepted as righteous.
2. Code of Conduct	The principles of right conduct which represent professional virtue and ethics formulated by individuals of each profession to use as guidelines. They encourage self-consciousness of righteous behavior and adherence for protection and honor of individual and organization.
3. The Company or UV	Univentures Public Company Limited
4. UV Group	Univentures Public Company Limited and its subsidiaries (excluding Golden Land Property Development Public Company Limited)
5. UV Director	Directors of Univentures Public Company Limited
6. UV Group Director	Directors of Univentures Public Company Limited and its subsidiaries (excluding Golden Land Property Development Public Company Limited)
7. UV Executive	<p>Executives of Univentures Public Company Limited according to the definition of the executives of Securities and Exchange Commission (According to the Notification of the Securities and Exchange Commission Kor Chor 15/2554 Re: Determination of Definitions in Notifications concerning Issuance and Offer for Sale of Securities (No. 3), they are a manager or the next four executives succeeding the manager and every person holding an equivalent position to the fourth executive, including persons holding the position of departmental manager or equivalent or higher in accounting or finance) which include:</p> <ol style="list-style-type: none"> 1. UV President 2. UV Executive Vice President 3. Vice President; Accounting 4. Vice President; Finance and Budgeting
8. UV Group Executives	Executives in position of director and above of Univentures Public Company Limited and its subsidiaries (excluding Golden Land Property Development Ltd)
9. Employees	Employees of Univentures Public Company Limited and its subsidiaries, including full-time and temporary staff. (excluding Golden Land Property Development Ltd)



SECTION 1 CODE OF CONDUCT

The Parties concerned and involved with this Code of Conduct:

1. Parties obliged to comply with this Code of Conduct
 - 1.1 Directors
 - 1.2 Executives
 - 1.3 Employees
2. Stakeholders to whom the Company's directors, executives and employees hold responsibilities for
 - 2.1 The Company
 - 2.2 Shareholders
 - 2.3 Employees
 - 2.4 Customers
 - 2.5 Trade partners, competitors, and creditors
 - 2.6 Regulators
 - 2.7 Society, Environment, and Education

UV Group's directors, executives and employees have duties to strictly comply with the Code of Conduct set by the Company in order to represent their responsibilities to stakeholders related to UV Group. The Code of Conduct of UV Group shall govern the Parties obliged to comply and Responsibilities to the stakeholders which are defined in the below table:

Parties obliged to comply	Stakeholders								
	The Company	Shareholders	Employees	Customers	Partners	Competitors	Creditors	Regulators	Society and Environment
Directors	✓	✓	✓	✓	✓	✓	✓	✓	✓
Executives	✓	✓	✓	✓	✓	✓	✓	✓	✓
Employees	✓	✓	-	✓	✓	✓	✓	✓	✓

**CODE OF CONDUCT TO STAKEHOLDERS****● Code of Conduct for Responsibilities to the Company**

1. To perform duties with responsibility and to carry out such duties for the optimal benefits of the Company.
2. Not to undertake any transaction or action that may compete with or may lead to any competition with UV Group's business.
3. To perform duties with honesty.
4. To be responsible for using and safeguarding the Company's properties and assets for the highest benefit of the Company and not for personal benefit or any other benefit apart from UV Group's business.
5. To perform with full capacity of knowledge and experience for the utmost benefit of UV Group
6. To strictly comply with UV Group's rules and regulations.
7. To refrain from directly or indirectly abusing their own authority or allowing anyone to abuse it for their own benefit or the benefit of any other.
8. To avoid accepting favor or hospitality that is not a reasonable adjunct to a normal business relationship, from those whose business is involved with UV Group.
9. To refrain from expressing opinions to outsiders on issues that may impact UV Group's reputation and operations.
10. Not to use information or material with significance to UV Group to seek profit or benefit, directly and indirectly, and to safeguard UV Group's confidentiality from being leaked or revealed to others which may cause damage to the Company, as well as not to give out confidential information or documents of UV Group to any outsiders. All must strictly comply with Information Safeguard policy and Information Disclosure policy as prescribed in Section 2: Policy Guidelines of this Code of Conduct.
11. To report or file a whistleblower claim on any suspected incidents or signs that may involve an unlawful, unethical, and fraudulent action or behavior of the Company's personnel and its stakeholders. These incidents also include inaccurate financial statements, as well as internal control failures. All must strictly comply with Whistleblowing Policy as prescribed in Section 2: Policy Guidelines of this Code of Conduct.

● Code of Conduct on Responsibilities to Shareholders

1. To perform duties with honesty, in compliance with laws and UV Group's regulations, and abide by this Code of Conduct for all transactions and decision making actions to ensure that the business operations are conducted in an honest, clear, transparent and accountable manner.
2. To perform duties with committed professional capability and to be dedicated in applying knowledge and experience thereto.



3. To maintain the confidentiality of shareholders' information and data with utmost care and protect the confidentiality of this information as if they are one's own confidential personal data.
4. To disclose UV Group's information to its shareholders accurately, adequately, timely, and equitably according to the rules prescribed by the Office of the Securities and Exchange Commission ("SEC") and the Stock Exchange of Thailand ("SET").

- **Code of Conduct on Responsibilities to Employees**

UV believes that employees are valuable resources and key success factor to its achievements. In this regard, the Company encourages superior organizational culture, a positive work environment, corporate unity and teamwork. It therefore commits to treat all of its employees equitably on human rights principals with the following guidelines:

1. To offer fair and appropriate compensation and sufficient fringe benefits to employees such as provident fund, annual health check-up, medical treatment, and other relevant monetary support - all which are accordingly reviewed and updated based on UV Group's short and long-term performances. In addition to the monthly salary given to the employees, the Company, together with its employees, jointly set clear work targets and determine a set of key performance indicators (KPIs) as quantifiable measures for calculation of special annual remunerations. It also provides additional staff welfare and organizes appropriate activity programs for employees that are comparable to other leading companies in the same industry. Employees can access this information on welfare and beneficial activities beneficial at UV Group's intranet, www.intra.univentures.co.th.
2. To treat its employees with dignity and respect, as well as to honor their individuality.
3. To recruit its employees via selection process and employment conditions that are efficient and fair to ensure that the Company can recruit qualified and ethical employees.
4. To provide thorough and fair care to all its employees, as well as to respect and protect and their rights from violation.
5. To promote employees' good life balance for both work and personal life.
6. To always maintain work environment to be safe and healthy for life and assets of employees.
7. To justly and honestly handle any staff appointment, transfer, rewarding, remuneration, and punishment on the basis of their justified knowledge, skills, and suitability, as well as according to the Company's rules and regulations.
8. To give importance to constant development of employee skills and knowledge by consistently organizing training workshops provided in-house or through external training programs in order for the employees to apply their training to enhance their work effectiveness.



9. To equitably and justly listen to opinions and suggestions from employees of all work levels, and provide a communication channel for staff to inform or file complaint concerning any wrongdoing including any whistleblowing of misconducted incident or circumstance that may impact their work or their decision. In this regard, the Company's Whistleblower Policy prescribed in Section 2 of this Code of Conduct must be adhered to. Employees can find and access to this information on the Company's intranet www.intra.univentures.co.th.
10. To strictly comply with applicable laws, rules and regulations regarding employee.

- **Code of Conduct on Responsibilities to Customers**

1. To treat customers fairly with regards to the provision of the Company's goods and services; including quality of products and services and delivery of quality goods and services that satisfy customer needs at a fair and reasonable price.
2. To disclose accurate, comprehensive, and sufficient information on the Company's goods and services to prevent customers from any possible misunderstanding on the quality or the sales conditions of its product and services, as well as to promptly respond to customer demand for service in order to optimize customer satisfaction.
3. To protect the customers' confidential information and material, as well as not to wrongfully apply it for any self-benefit or benefit of any other related parties, and not to disclose customer information without prior permission from such customer or the Company's authority unless the information is required by law to be disclosed to relevant outside parties.
4. To provide a communication channel for customers to voice their complaints on the Company's goods and services in adherence to the Company's Whistleblower Policy prescribed in Section 2 of this Code of Conduct.

- **Code on Conduct on Responsibilities to Trade Partners, Competitors, and Creditors**

- Responsibilities to Trade Partners

UV Group honesty abides by fair competition framework with strict adherence to its contract, its Code of Conduct, and its commitment to its trade partners with the following guidelines:

1. To select trade partners via transparent system in accordance to the procurement rules and procedures of the Company. The selection criteria will be based on trade partners that have reliable history and business conditions, stable financial status, well-known reputation and expertise, high credibility, and acceptance from other operators within the same business or industry. In this regard, they must not have history of trade prohibition as a result from corruption or history of work abandonment or are listed in the



prohibited companies by government or private sector. In addition, their products or services must provide satisfaction and consistency of quality, price, service, and delivery.

2. To consider appropriate and fair price in comparison to quality of product and/or service of trade partners, and arrange contracting in the form that is appropriate to mutual agreements of both parties, as well as fully comply contract terms and conditions to prevent corruption and wrongdoing within procurement process.
3. To promptly and punctually provide payments due to trade partners.
4. To set clear rules on procurements and to operate its business in a sustainable and transparent manner.
5. To strictly abide by prior agreed contracts or trade conditions, and in the event that such agreements or trade conditions with any relevant trade partner cannot be complied with, that trade partner shall be promptly informed to mutually seek a possible means to resolve the matter.
6. Not to request or accept any assets or benefits from trade partners.
7. To avoid any purchase of goods or services from trade partners who are involved in human rights violation or intellectual property rights infringement.
8. Not to disclose information of its trade partners to any third party except with the trade partners' prior approval or the information is required by law to be disclosed to relevant outside parties.
9. Not to do business with trade partners who disobey laws or disrupt public order and good morals.

● **Code of Conduct on Responsibilities to Trade Competitors**

1. To comply with the rules of trade competition laws and fair competition.
2. Not to seek out trade competitors' secrets using wrongful or inappropriate methods.
3. Not to harm competitors' reputation by making malicious accusation.

● **Code of Conduct on Responsibilities to Creditors**

It is UV Group's policies to justly and transparently treat all its creditors; whether they are trade creditors or creditors which are financial institutions, and to promptly pay its debts and dues according to their schedule or agreement without fail in order to preserve its credibility towards its trade partners and financial institutions. The Company strictly abides by the terms and conditions of its contracts and agreements in accordance to the following guidelines:

1. To treat all trade creditors justly and equally and on common grounds for mutual benefits.
2. To strictly abide by prior agreed contracts or conditions especially with financial institution officers in regards to purpose of money usage, payment of principal and interest, and guarantee conditions.

The Company gives importance to capital management in order to maintain stability of financial status and preserve sufficient liquidity for punctual payment to creditors. In addition, the Company



will report financial status and information to creditors according to agreement with accuracy, transparency, and consistency. In the event that such contracts or conditions with any relevant creditor cannot be complied with, that creditor shall be promptly informed to mutually seek a possible means to resolve the matter.

● **Code of Conduct on Responsibilities to Regulators**

The Company and employees of UV Group of all levels must perform duties with strict compliance to laws and regulations prescribed by the regulators who are governing business of UV Group, as well as not to provide support to individuals to act against laws, regulations, and code of conduct and must study, understand, and follow related laws and regulations consistently.

● **Code of Conduct on Responsibilities to Society and Environment**

1. To foster self-awareness on social and environmental responsibilities to employees on all levels.
2. To promote efficient usage and conservation of energy.
3. To promote development of social quality with commitment to providing knowledge to the youth and public.



SECTION 2

POLICY GUIDELINES

For the Company's directors, executives, and employees to have a clear understanding and clear comprehension of expected professional requirements which are in compliance with laws, rules, and regulations as well as abiding with business code of conduct, the Company therefore prescribes the following policy guidelines for its directors, executives, and employees to adhere to so that they can perform their duties with transparency, righteousness, clarity and accountability.

- 2.1 Policy on Managing Conflict of Interest
- 2.2 Policy on Reporting of Equity/ Security Holdings
- 2.3 Policy on Gifts, Assets, or Other Benefits
- 2.4 Policy on Information Security/Safeguarding of Internal Information
- 2.5 Policy on Information Disclosure
- 2.6 Policy on Risk Management
- 2.7 Policy on Whistleblowing
- 2.8 Policy on Human Rights
- 2.9 Policy on Protection and Non-infringement of Intellectual Property

The above mentioned policies shall involve the parties obliged to comply as stated in the following table:

Policy	Parties obliged to comply				
	UV Directors	UV Group Directors	UV Executives	UV Group Executives	Employees
Managing Conflicts of Interest	✓	✓	✓	✓	✓
Reporting of Equity/Security Holdings	✓	✓	✓	✓	-
Receipt of Gifts, Assets, and Benefits	✓	✓	✓	✓	✓
Information Security/ Safeguarding of Internal Information	✓	✓	✓	✓	✓
Information Disclosure	✓	✓	✓	✓	✓
Risk Management	✓	✓	✓	✓	✓
Whistleblowing	✓	✓	✓	✓	✓
Human Rights	✓	✓	✓	✓	✓
Protection and Non-infringement of Intellectual Property	✓	✓	✓	✓	✓



2.1 Policy on Managing Conflicts of Interest

1. To refrain from undertaking any related transactions, except in cases of unavoidable necessity that such transactions must be performed for the benefits of UV Group, then such transactions may be undertaken only if they are transacted on the same grounds as if they are transacted with any other outsiders. In this regard, the directors, executives, and employees who are involved as stakeholders must abstain from participating in decision-making and shall promptly disclose any relevant information thereof in accordance with applicable laws and prescribed regulatory procedures.
2. Related transactions must be audited or reviewed by the Audit Committee. In the event that any member of the Audit Committee become involved as a stakeholder in the related transaction, the affected member must not participate in any decision-making the related transaction.
3. Directors, executives, and employees shall not apply information obtained through their positions for personal benefits such as to be involved in business related to or in competition with UV Group.
4. To avoid working for or taking any position with any entity other than UV Group, unless such work or position shall help improve his/her work with the Company and be beneficial to UV Group.
5. All UV executives, UV Group executives and employees have duties to disclose any transactions that may cause any conflict of interest by completing the attached form of this Code of Conduct (Form 1) and promptly submit it to the Compliance Office and the Head Internal Control Office without delays.

Note: All UV directors and UV executives are obliged to disclose their interests and the interest of their related parties as well as their security holdings according to the policy guidelines as prescribed in this Code under the reporting of related party transactions (Section 89)/security holdings (Section 59) in the next section.

2.2 Policy on Reporting of Equity (Section 89)/Security Holdings (Section 59)

1. All UV directors, UV Group directors, UV executives and UV Group executives are obliged to report their interests and the interests of their related parties according to the Notification of Univentures Public Company Limited No. 6/2009 Re: Rules and procedures regarding reporting of UV directors, executives, and related parties' interests, which was approved by the resolution of the Company's Board on 13 May 2009 under the procedure (Attachment 2) and in the form (Form 2) as prescribed by the Company in this Code of Conduct and shall then forward these reports to the Company Secretary to combine equity reports and submit to the Chairman of the Board of Directors and the Chairman of the Audit Committee within 7 days from the date of their receipt as per the rule prescribed by the Securities and Exchange Act.
2. No UV directors, UV Group directors, UV executives and UV Group executives shall purchase or sell any securities of the Company (UV securities) during a prohibited period of one month prior to the public disclosure of the Company's financial statements and shall require waiting for at least 48 hours after such public disclosure of the information to be able to purchase or sell any such securities. Every three



- months, the Company shall inform its UV directors, UV Group directors, UV executives and UV Group executives of the prohibited period for any security trading.
3. In the event that any UV director or UV executive undertakes any purchase or sale or transfer of any securities of the Company (UV securities), or be a recipient of any such transfer thereof, he/she shall submit the relevant reports of such trading to the Office of the Securities and Exchange Commission in the form as prescribed by Securities and Exchange Commission (Form 3) that appears in this Code through electronic media channels specified by to the Office of the Securities and Exchange Commission within three business days from the date of purchase or sale or transfer of such securities.
 4. All UV directors and UV executives are obliged to report the changes in their security holdings of UV securities to UV Board of Directors in order to ensure the confidence of its shareholders and general investors that its directors and executives can manage the Company's business with honesty, clarity, transparency, and accountability.
 5. In the event that UV Group directors and UV Group executives undertake any purchase or sale or transfer of any securities of the Company (UV securities), or be a recipient of any such transfer thereof, he/she shall submit the relevant reports of such trading to Corporate Compliance Department with form prescribed by the Company within three business days from the date of purchase or sale or transfer of such securities.

2.3 Policy on Gifts, Assets, or Other Benefits

1. The Company does not encourage its trade partners, sales agents, contractors, sub-contractors or any parties who are involved with the Company's business to offer gifts, assets, or other benefits to its directors, executives and employees that might influence their decision-making in work with bias or create discomfort or result in conflict of interest, except for any offering of gifts or presents traditionally given on conventional occasions.
2. For the offering of gifts, assets, and benefits to any other person, the Company shall apply its discretion to make sure that such gifts will not be too costly or lavish or considered inappropriate according to any traditional practices.
3. UV executives and employees shall not accept any cash, gifts, presents, assets, or other benefits that are inappropriate, except for those reasonably offered on conventional or traditional occasions. In the inevitable event that the acceptance of such gifts cannot be avoided or refused, any executive and employee who receives any cash, gifts, or presents that exceed the value of Baht 3,000 shall report to his/her line supervisor by completing the gift receiving form prescribed by the Company (Form 4) and send it to the Compliance Office for further submission to the relevant authority for consideration and action.



2.4 Policy on Information Security/Safeguarding of Internal Information

1. Directors, executives, and employees are obliged to strictly safeguard UV Group's confidential information, especially any internal information that has not been disclosed to the public or information that may impact the Company's operations or may affect its share prices.
2. Directors, executives, and employees will not take advantage of any business opportunities or make use of confidential information obtained from their positions with UV Group for personal gain and shall not use internal information for personal benefit or provide internal information to anyone for the purpose of trading the Company's shares.
3. UV Group's personnel, who have access to UV Group's confidential and trade secret information such as business plans, technologies, innovations, maps, data or formulas belonging to the Company, shall not disclose such confidential and trade secret information to anyone outside of the Company even though he/she no longer holds his/her position as director, executive, or employee of UV Group. The Directors, executives, and all employees who must sign acknowledgement that they strictly adopt and abide by the Code of Conduct will be obliged not to disclose confidential information or documents or trade secrets that they have gained due to their work duties during the next two years after the termination of their work with UV Group.
4. In order to prevent inappropriate use of the Company's internal information which represents a breach of responsibilities to the Company and its shareholders, the Company therefore prescribes classification levels to its confidential information. Important information that has not been disclosed to the public or information that may impact the Company's operations or its share prices shall only be accessed by relevant directors and executives.

2.5 Policy on Information Disclosure

1. The Company has policy to avoid providing information that have not been disclosed to general public, reporter, analyst, or other individuals. Consequently, every crucial information that have not been disclosed to public must gain approval from the Chief Executive Officer or the President first prior to disclosure in which the Chief Executive Officer or the President may choose to provide such information by himself/herself or assign Investor Relations or related persons to provide the information. In regards to information related to joint venture, the Company must gain approval from its joint venture before disclosing the information in accordance to terms and conditions in their mutual agreement. In this regard, disclosure of company information will be operated under the regulations of the Office of the Securities and Exchange Commission and the Stock Exchange of Thailand,
2. In an event that shareholders or investors make any inquiries to the Company, Investor Relation Office or Compliance Department or Internal Audit Department or the Company Secretary, or any other business



units assigned by the Chief Executive Officer or the President, shall be the party responsible for providing answers to such inquiries. The provided information must be publicly disclosed and disseminated according to conditions prescribed by the Office of the Securities and Exchange Commission and the Stock Exchange of Thailand. If the provided information is particular information that has not been disclosed publicly, the disclosure thereof shall always require prior approval from the Chief Executive Officer or the President.

2.6 Policy on Risk Management

1. To prescribe that risk management is the responsibility that directors, executives and employees of all levels must be aware of, and to pay attention to any specific risks that may incur in their business units or in UV Group. Appropriate and sufficient attention shall also be paid to risk management in all aspects.
2. To establish an enterprise risk management process that is acceptable according to global standards. UV Group operates its business within the tolerable risk framework to achieve its corporate objectives and response to stakeholder expectations. Risk management is indicated as a vital part of its annual business plan, its management strategy, its day-to-day decision-making, and project management process.
3. Risks that can potentially impact the Company's success in achieving its business plans or goals must be proceeded as follows:
 - Risks must be identified in a timely manner.
 - Assessments must be made on probability of risk occurrence and risk consequence.
 - Risks must be managed according to the prescribed risk management principles with consideration to the costs involved and the benefits obtained from risk management.
 - Monitoring and review is an essential step to ensure that UV Group's risk factors are being properly managed.
4. All risks that may affect the Company's business plans and strategies, and are identified to be in the high or very high risk levels must be reported to the Executive Board, the Audit Committee, and the Company's Board of Directors.

2.7 Policy on Whistleblowing

Objective of Whistleblowing

1. To provide all stakeholders, including the Company's employees, with a communication channel to report any unlawful act or fraudulent incident or wrongful behavior of personnel in the Company or to make a complaint on any action against corporate governance or business ethics to the Audit Committee.
2. To provide fair practice guidelines on complaint handling procedures that are precise, clear, and accountable, as well as in compliance with applicable laws, good corporate governance, business ethics, and the Company's rules and regulations.



3. To make use of the complaints for improvement of UV Group's business operations and for prevention of issues that may occur in the future.

Complaint Handling Procedures

1. Venue for filing complaints

Complaints can be directly filed to the Audit Committee or the Head of Internal Audit Department by various channels set by the Company such as:

1.1 By Telephone

- A complainant can directly file his/her complaint to the Head of Internal Audit Department by calling the Telephone Number 02-643 7100 Extension 7195 - 7 (during business hours).
- When a complainant makes a call to the Telephone Number 02 643 7100, the operator will make a preliminary enquiry and transfer the line to the Head of Internal Audit Department for further inquiry and action.

1.2 Filing by Mail or Filing in Person

- A suggestion box is available and visibly placed on the reception desk in the main lobby of Univentures Public Company Limited for complainants to conveniently file their complaints.
- Complaint filing can be made via email at: wid@univentures.co.th
- Complaints can be informed in person to the Head of Internal Audit Department.
- Complaint filing can be made by mail to:

Head of Internal Audit Department

Univentures Public Company Limited

22nd Floor, Park Ventures Ecoplex, 57 Wireless Road

Lumpini, Patumwan, Bangkok 10330

Complainants can see the complaint handling procedure or download the complaint form at the Company's website: www.univentures.co.th (Form 5: Complaint Form is attached with this Code of Conduct).

2. Process for Complaint Handling

- 2.1 The Head of Internal Audit Department will request information from the complainant in which he/she can file complaint without disclosing his/her name in the case that the complainant does not wish to expose himself/herself in which the Company will consider and examine only evidence that appears. The consideration for complaint handling is under the Company's discretion and importance of the complaint issue. If the Company has evaluated and viewed that the complaint



issue is significant and reasonable, it will consider to proceed on finding solution for the issue according to its prescribed procedures.

- 2.2 If the complainant wishes to disclose his/her name, the Head of Internal Audit Department will record first name, last name, address, and phone number of the complainant to confirm identity of the complainant into complaint form. In this case, the complainant may receive faster evaluation and solution than when he/she does not disclose his/her identity because the Company can request additional information from the complainant to examine facts or search for related evidence from relevant department or personnel.
- 2.3 The Head of Internal Audit Department will make a preliminary information examination with department or system related to the complaint. If the Company has evaluated and viewed that the complaint contains facts and significance, it will consider to provide solution for the complaint within 30 days from the date it receives the complaint. Then, it will contact the complainant to report the Company's progress on such complaint within 7 days from the date that it has completed the relevant procedures.
- 2.4 In the case of force majeure which leads to the period of complaint resolution taking longer than 30 days, the Company will inform its progress to the complainant in the form of letter for every 15 business days from the date that the 30-day period ends.
- 2.5 The Head of Internal Audit Department will consolidate complaints and report to the Audit Committee in Audit Committee Meeting in quarterly period.
- 2.6 In the case that the Company has examined and found that the complaint contains facts and significance which is an action against laws or against regulations, good corporate governance, its Code of Conduct, or negatively impacts corporate image, reputation, or business operations of UV Group, the Head of Internal Audit Department will report to the Audit Committee immediately.

Whistleblowing Protection

It is the Company's policy to provide fairness and protection to its employees or any outsiders who report any suspected incidents or signs that may involve an unlawful act in compliance with applicable rules and regulations, and any unethical conduct, as well as misrepresentation of financial statements, or deficiency of internal control systems. The Company therefore fosters protection measures for whistleblowers and complainants. A whistleblower and a complainant can choose not to reveal his/her identity, and all whistleblower claims and information will be kept confidential. The Company appoints its executive, the Head of Internal Audit Department, and the Company Secretary to be directly responsible persons in the procedures related to evaluation, examination, and resolution of the complaint, and no disclosure of the name of whistleblower, complainant, or witness will be made except the disclosure to individuals with investigation



authority for efficiency and speed for related procedures. The whistleblowing information or complaint is therefore acknowledged only by the Audit Committee, the President, the Company's secretary, and the Head of Internal Audit Department. For whistleblowing and complaint related to high level executives of UV Group, it will be known to only the Audit Committee, the Company's secretary, and the Head of Internal Audit Department in order to prevent unfair action to employees or the individuals who make the whistleblowing or complaint to the Company.

In addition, the Company also prohibits any unfair treatment of employees, staff or any person hired to work for the Company with regards to transfer and promotion, nature of work, the workplace, suspension, threat, disturbance, termination of work or any act which may be considered unfair treatment under Section 89/2 of the Securities and Exchange Act, B.E. 2535.

2.8 Policy on Human Rights

The Company commits to operate its business fairly with adherence to responsibilities to society and all stakeholders according to its corporate governance and Code of Conduct. In regards to protection of human rights, the Company strictly complies with relevant regulations in which the Board of Directors, executives, and employees of all levels must be aware of their importance and respect human rights of individuals, society, and community under laws or ethical principles which include equitably treatment to individuals in accordance to human rights principles, avoidance of discrimination, avoidance of action that violate human rights, and support for human rights. In addition, it also communicates to parties related to business operations of UV Group to support moral business operations, respect for human rights, and equitably and fair treatment to every individual which align with the Company's policy on human rights. The Company has guidelines on human rights as follows:

1. To provide respect to human rights by prescribing the directors, executives, and employees of all levels to treat one another with respect, honor, and equality without discrimination or restricting rights of individuals, society, and community with differences including differences of thought, ethnicity, nationality, religion, gender, language, age, skin color, education, social status, etc.
2. To arrange work environment that represents respect and acknowledge of individual honor and prevent any cases of threatening, harassment, violation, as well as to treat employees with regards to employment, compensation, welfare, training and development, promotion evaluation, discipline and punishment, dismissal on the basis of work capability and efficiency rather than individual specific characteristics.
3. To prescribe the directors, executives, and employees of all levels to take cautions in their duties in order to prevent risks on violation of human rights within business operations of UV Group.
4. To encourage and foster UV Group on adherence to human rights by support or promotion of procedures to protect human rights, as well as communicate and encourage parties related to business operations of UV Group such as supplier, contractor, joint venture to morally operate their businesses with respect to



human rights and equitably and fair treatment to all individuals. In this regard, the Company has policy not to conduct business with companies that do not consider human rights, especially with violation on fundamental rights in regards to race, woman, children, disable, etc.

5. To avoid negligence or ignorance when witnessing act related to UV Group that is considered a violation to human rights in which he/she must report to superior or responsible persons and provide cooperation in examination of facts. It also gives fairness and protection to individuals who make whistleblowing or complaint on human rights violation related to UV Group in which the Company uses whistleblowing protection measures as guidelines to protect whistleblower or complainant on human rights violation as well as to protect individuals who cooperate on examination of facts. Furthermore, the directors, executives, and employees who violate human rights which is against the Company's corporate governance and Code of Conduct must receive evaluation on disciplines from the Company and/or receive punishment according to laws if the violation is illegal.

2.9 Policy on Protection and Non-infringement of Intellectual Property

The Company is aware of the importance of protection of intellectual property of UV Group from infringement or unauthorized usage, as well as providing respect and not conducting infringement on intellectual property of others. Its executives and employees must comply with laws or regulations related to intellectual property, copyright, patent, trademark, trade secret, as well as computer crime laws. It has guidelines as follows:

1. Not to use UV Group's intellectual property for personal benefits or public disclosure without approval in which utilization, duplication, adaptation, disclosure, or publish of UV Group's copyright work, fully or partly to public, must receive approval from the Company.
2. Not to use intellectual property of UV Group or other persons without approval as this is an infringement on intellectual property which is considered disciplinary wrongdoing and may receive charge of criminal case as well as obligation to compensate for civil damages.
3. To support usage of products and services with correct copyright and not to support products or actions that are violation to intellectual property.
4. Executives or employees who are no longer employees of UV Group must return all intellectual property such as reports, statistics, programs, blueprints, trade information, software, and manufacturing process to the Company.
5. To prescribe executives and employees of all levels to strictly comply with rules on computer usage of the Company in all aspects such as usage of e-mail and internet, usage and installation of computer software, control on access and security of system and information in order to ensure efficiency of computer system usage and highest benefit to the Company and also mitigate risks from computer usage that falls into wrongdoing according to Computer-related Crime Act B.E 2550 which has criminal penalty.



6. To arrange system to secure information of UV Group from access to confidential or significant information of the Company by non-related employees or outside individuals and from attack of computer virus in which it has installed protection equipment and control on access to the Company's information and computer system (Firewall), installed Anti-virus software to all computers of UV Group, as well as separating network system zones. In addition, the Company has arranged data backup and recovery system in which it has organized disaster recovery plan with annual practice on its data recovery plan.

Punitive Disciplinary Measures

The Company's Code of Conduct is considered as discipline that the directors, executives, and employees of UV Group must strictly comply with. In regards to the non-compliance or violation on any Code of Conduct that result in UV Group receiving damages or losing business opportunity, the individual who does not comply or conducts violation will receive the Company's punitive disciplinary measures related to work concerning disciplinary action and may be additionally considered as an offender according to Securities and Exchange Act B.E.2535.

Monitoring of Implementation

1. To prescribe the duty and responsibility of directors, executives, and all employees to acknowledge, understand, and strictly comply with the Code of Conduct.
2. To prescribe approaches for commendation to individuals who follow guidelines of Code of Conduct and punishment for those who do not comply such as offering gifts to individuals who act righteously, giving disciplinary action to those with violation, etc. in order to support strict compliance to the Code of Conduct.
3. To prescribe channels for making enquiries related to compliance to the Code of Conduct, as well as whistleblowing or complaints related to actions that are against laws, regulations, good corporate governance, and Code of Conduct in which there are multiple channels such as immediate supervisor, legal advisor, Head of Internal Audit Department, Compliance Department, or via email to the Company's intranet website.
4. To prescribe the Head of Internal Audit Department to be responsible for monitoring, following up on Code of Conduct compliance, and directly report to the Audit Committee.
5. To prescribe annual review of the Code of Conduct to ensure its suitability to business environment alignment to regulations which may have changed.

This Code of Conduct (Revised Edition 2017-18) is approved by the Company's Board of Directors in the meeting of the Board of Directors No. 6/2017-18 on 14 September 2018. It is effective from 17 September 2018 onwards.

Section 3

Attachment

**The Notification of Univentures Public Company Limited
No. 6/2009 Re: Rules and reporting procedures on interests of
UV directors, executives, and related persons**

Section 89/14 of the Securities and Exchange Act, B.E. 2535 (As Amended) stipulates that “a director and an executive shall file with the company a report on his interests or a related person’s interests in relation to the management of the company or the subsidiary”, and the notification of the Capital Market Supervisory Board No. Tor Jor 2/2551 requires that a company’s board of director must prescribe its rules and procedures regarding reporting of such interest to ensure that the company has prescribed information on connected transactions that may cause conflicts of interest and siphoning or transfer of business interests out of the company and its subsidiaries.

The Company’s Board of Directors unanimously resolved the approval of the rules and procedures regarding the report of interests of directors, executives and related persons at the Meeting of the Board of Directors No. 3/2009, held on 13 May 2009. These rules and procedures are as follows:

Details/Methods	
Interests (definition of “Interests” applied in this Notification)	Means the interests gain or loss, directly or indirectly, from entering into any agreement or transaction of publicly listed companies or subsidiaries.
Concerned parties who are required to file a report	Directors, executives, and related persons <ol style="list-style-type: none"> 1. All directors 2. Executives who are among the four highest levels of the Company’s management after the Executive Chairman. 3. The management in the top fourth level and the equivalent positions thereof. 4. Executives in the Accounting & Finance Department from the level of the Department Chief upward, or the equivalent positions thereof.
Timing of Reporting	<ol style="list-style-type: none"> 1. The report of interests was initially required by the Company even before the relevant law was effectively enforced. (1 July 2009) 2. Reporting shall be filed within 15 business days after the concerned parties have taken their positions. 3. Concerned parties must file a report to the Company within 15 business days after undertaking any transaction that may be deemed as having such defined interests.



Details/Methods	
Information required to be filed in the report	<p>Information prescribed in the reporting form on interests of directors, executives and related persons (Attached), the details of which are as follows:</p> <p>Part 1: General information of the filer and his/her related persons.</p> <ul style="list-style-type: none"> ● Name - Family Name ● Former Name - Family Name (if any) ● Position ● Status <p>Part 2: General information of the related persons of the filer.</p> <p>2.1 General information of individuals who are related persons as prescribed according to Section 89 of the Securities and Exchange Act who are:</p> <ul style="list-style-type: none"> ● Spouse ● Minor child or minor adopted child <p>2.2 General information of close relatives meaning:</p> <ul style="list-style-type: none"> ● Father Mother ● Spouse ● Siblings ● Children and their spouses <p>2.3 Juristic entities prescribed as related parties to the filer are the juristic entities that spouse, or minor children and minor adopted children of the filer have a controlling interest therein by:</p> <ul style="list-style-type: none"> ● Having an interest of 50% or more of voting shares, or ● Having the power of control at shareholders' meetings, or ● Having the power of control for any appointment or removal of half of the total number of board members, or more. <p><u>Note:</u> Report only on juristic entities having or anticipated to have any connected transaction with the Company or its subsidiaries.</p>

Details/Methods	
	<p>Part 3: Information on directorship or management position in other juristic entities which are parties related to the filer.</p> <p>3.1 Directorship or management position in other juristic entities of the filer.</p> <p>3.2 Directorship or management in other juristic entities of individuals and close relatives who are persons related to the filer.</p> <p><u>Note:</u> Report only on juristic entities having or anticipated to have any connected transaction with the Company or its subsidiaries.</p> <p>Part 4: Information on shareholding in other juristic entities, including shareholding of persons related to the filer.</p> <p>Calculate from the worksheet applied for calculation of shares held in each of the other juristic entities that appears at the end of the report form for "Report of Interests of Directors, Executives and Related Persons".</p> <p><u>Note:</u> Report only on juristic entities having or anticipated to have any connected transaction with the Company or its subsidiaries.</p>
Reporting Procedures	<p>Upon the completion of the report of interests by directors, executives and related parties as prescribed by the Company, the Company Secretary shall</p> <ol style="list-style-type: none"> 1. Send a copy of the report of interests to the Chairman of the Audit Committee within 7 days after the receipt thereof. 2. Protect such reports.

This action shall become effective from the date of 1 July, 2009

Notified as of 29 May 2009.



Ms. Orrudee Na Ranong)

Executive Chairman

Univentures Public Company Limited

Section 4

Form

Conflict of Interest Disclosure Form

For executives and employees of UV Group to abide by as the principles of business conduct adopted according to professional integrity and ethics, all the mentioned personnel must promptly disclose any transaction that may give rise to a conflict of interest according to the following policy guidelines prescribed by the Company.

I, whose name is(family name), hold the position of
(Title/Department), would like to report the following transactions that may give rise to conflicts of interest against Univentures Public Company Limited and its group.

1. Transactions that may give rise to conflicts of interest against Univentures Public Company Limited

On..... I was involved in the following actions/transactions that could contribute to a conflict of interest against Univentures Public Company Limited.

.....

2. Transactions that may give rise to conflicts of interest against companies in the UV Group

On.....I was involved in the following actions/transactions that could contribute to a conflict of interest against companies in the UV Group.

.....

Signature.....	Signature.....	Signature.....
Filer	Head of Internal Audit Department	Company Secretary
Date.....	Date.....	Date.....



**REPORT OF INTERESTS OF DIRECTORS, EXECUTIVES AND RELATED PERSONS
UNIVENTURES PUBLIC COMPANY LIMITED**

Form 2: For UV Director and Executive

Report Date
Date / Month / Year / /

Initial Report

Report of Information Change

▶ Part 1: General Information of the Filer

Name - Family Name

Position

Former Name –
Family Name (If Any)

Status Single Married Divorce Others.....

Part 2: General Information of the Persons Related to the Filer

2.1: General Information of Individuals Who Are Related Persons

Name of Spouse <input type="text"/>		3. Name of Child/ Adopted Child <input type="text"/>	
No. of Children <input type="text"/> Person	No. of Adopted Child <input type="text"/> Person	Birthday (DD/MM/YYYY) <input type="text"/> / <input type="text"/> / <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/>	
1. Name of Child/ Adopted Child <input type="text"/>		4. Name of Child/ Adopted Child <input type="text"/>	
Birthday (DD/MM/YYYY) <input type="text"/> / <input type="text"/> / <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/>		Birthday (DD/MM/YYYY) <input type="text"/> / <input type="text"/> / <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/>	
2. Name of Child/ Adopted Child <input type="text"/>		5. Name of Child/ Adopted Child <input type="text"/>	
Birthday (DD/MM/YYYY) <input type="text"/> / <input type="text"/> / <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/>		Birthday (DD/MM/YYYY) <input type="text"/> / <input type="text"/> / <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/>	



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REPORT OF INTERESTS OF DIRECTORS, EXECUTIVES AND RELATED PERSONS
UNIVENTURES PUBLIC COMPANY LIMITED

2.2 : General Information of Close Relatives

Form with fields for: 1. Name of Father, 2. Name of Mother, 3. No. of Siblings (3.1-3.5), 4. Information of Spouses of Children/Older Siblings/Younger Siblings (4.1-4.5). Includes sub-fields for Age, Year, Occupation, and checkboxes for Alive/Death/Other, Single/Married/Death, Child's Spouse/Sibling's Spouse/Death.



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REPORT OF INTERESTS OF DIRECTORS, EXECUTIVES AND RELATED PERSONS
UNIVENTURES PUBLIC COMPANY LIMITED

2.3 : Juristic Entities to Have Any Connected Transaction with Filer. ^{Sec.89/14}

(Only Juristic Entities Having or Anticipated to Have Any Connected Transaction with the Company or Its Subsidiaries)

Name of the Controlling Interest	<input type="text"/>	Relationship with the Controlling Interest	<input type="checkbox"/> Filer <input type="checkbox"/> Spouse <input type="checkbox"/> Minor Child <input type="checkbox"/> Minor Adopted Child <input type="checkbox"/> Father <input type="checkbox"/> Mother <input type="checkbox"/> Older Sibling <input type="checkbox"/> Younger Sibling <input type="checkbox"/> Legal Age Child <input type="checkbox"/> Spouse of Child <input type="checkbox"/> Spouse of Older Sibling <input type="checkbox"/> Spouse of Younger Sibling
Name of the Juristic Entities ¹	<input type="text"/>	Legal Entity	<input type="checkbox"/> Limited Partnership <input type="checkbox"/> Company Limited <input type="checkbox"/> Public Company <input type="checkbox"/> Publicly Listed Company <input type="checkbox"/> Other.....
Address/Telephone	<input type="text"/>	Type of Business ²	<input type="text"/>

Name of the Controlling Interest	<input type="text"/>	Relationship with the Controlling Interest	<input type="checkbox"/> Filer <input type="checkbox"/> Spouse <input type="checkbox"/> Minor Child <input type="checkbox"/> Minor Adopted Child <input type="checkbox"/> Father <input type="checkbox"/> Mother <input type="checkbox"/> Older Sibling <input type="checkbox"/> Younger Sibling <input type="checkbox"/> Legal Age Child <input type="checkbox"/> Spouse of Child <input type="checkbox"/> Spouse of Older Sibling <input type="checkbox"/> Spouse of Younger Sibling
Name of the Juristic Entities ¹	<input type="text"/>	Legal Entity	<input type="checkbox"/> Limited Partnership <input type="checkbox"/> Company Limited <input type="checkbox"/> Public Company <input type="checkbox"/> Publicly Listed Company <input type="checkbox"/> Other.....
Address/Telephone	<input type="text"/>	Type of Business ²	<input type="text"/>

Note: ¹ Means the juristic entities that spouse/ minor children / minor adopted children of the filer have controlling interest by

1. Having an interest of 50% more of voting shares, or
2. Having the power of control at shareholders' meetings, or
3. Having the power of control for any appointment or removal half of the total number of board members, or more. Only juristic entities having or anticipated to have any connected transaction with the Company or its subsidiaries. (If no, please state "None")
4. or ² Means types of business such as agriculture, food industry, consumer goods, financial business, industrial goods, real estate and construction, service business, technology, etc.



**REPORT OF INTERESTS OF DIRECTORS, EXECUTIVES AND RELATED PERSONS
UNIVENTURES PUBLIC COMPANY LIMITED**

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▶ Part 3: Information on Directorship or Management Position⁴ in Other Juristic Entities⁵ of the Filer and Individuals Who Are Parties Related to the Filer

3.1 : Directorship or Management Position⁴ in Other Juristic Entities⁵ of the Filer (Only Juristic Entities Having or Anticipated to Have Any Connected Transaction with UV or Its Subsidiaries)

Name of the Juristic Entity ⁵	<input type="text"/>	Position ⁴	<input type="text"/>	Position Taking Date ⁶	<input type="text"/>
Address/ Telephone	<input type="text"/>	Legal Entity	<input type="checkbox"/> Limited Partnership <input type="checkbox"/> Company Limited <input type="checkbox"/> Public Company <input type="checkbox"/> Other.....	<input type="checkbox"/> Publicly Listed Company Type of Business ²	<input type="text"/>
Name of the Juristic Entity ⁵	<input type="text"/>	Position ⁴	<input type="text"/>	Position Taking Date ⁶	<input type="text"/>
Address/ Telephone	<input type="text"/>	Legal Entity	<input type="checkbox"/> Limited Partnership <input type="checkbox"/> Company Limited <input type="checkbox"/> Public Company <input type="checkbox"/> Other.....	<input type="checkbox"/> Publicly Listed Company Type of Business ²	<input type="text"/>
Name of the Juristic Entity ⁵	<input type="text"/>	Position ⁴	<input type="text"/>	Position Taking Date ⁶	<input type="text"/>
Address/ Telephone	<input type="text"/>	Legal Entity	<input type="checkbox"/> Limited Partnership <input type="checkbox"/> Company Limited <input type="checkbox"/> Public Company <input type="checkbox"/> Other.....	<input type="checkbox"/> Publicly Listed Company Type of Business ²	<input type="text"/>
Name of the Juristic Entity ⁵	<input type="text"/>	Position ⁴	<input type="text"/>	Position Taking Date ⁶	<input type="text"/>
Address/ Telephone	<input type="text"/>	Legal Entity	<input type="checkbox"/> Limited Partnership <input type="checkbox"/> Company Limited <input type="checkbox"/> Public Company <input type="checkbox"/> Other.....	<input type="checkbox"/> Publicly Listed Company Type of Business ²	<input type="text"/>

Note: ¹ Means juristic entities having or anticipated to have any connected transaction with the Company or its subsidiaries. (If no, please state "None")

² Means types of business such as agriculture, food industry, consumer goods, financial business, industrial goods, real estate and construction, service business, technology, etc.

³ Names legal entity of business such as limited partnership, company limited, public company, publicly listed company etc.

⁴ Means directors, General Manager, or executives who are among the four highest levels of the Company's management after the General Manager, as well as all the management in the top fourth level and the equivalent positions thereof, and executives in the Accounting & Finance Department from the level of the Department Chief upward, or the equivalent positions thereof.

⁵ Means juristic entities having or anticipated to have any connected transaction with the Company or its subsidiaries (If no, please state "None").

⁶ Means if the date of position taking cannot be stated, approximate number of years or the year of taking up position can be applied.

⁷ Means the amount taken from the shareholding ratio worksheet (on the next page). Applied only for the case of over 10% in shareholding since such ratio is deemed as being a major shareholder of such juristic entities.



**REPORT OF INTERESTS OF DIRECTORS, EXECUTIVES AND RELATED PERSONS
UNIVENTURES PUBLIC COMPANY LIMITED**

**3.2 : Directorship or Management Position⁴ in Other Juristic Entities⁵ of Individuals and Close Relatives Who Are Parties Related to the Filer
(Only Juristic Entities Having or Anticipated to Have Any Connected Transaction with UV or Its Subsidiaries)**

Name of the Juristic Entity ⁵	<input type="text"/>	Position ⁴	<input type="text"/>	Position Taking Date ⁶	<input type="text"/>
Address/Telephone	<input type="text"/>	Legal Entity	<input type="checkbox"/> Limited Partnership <input type="checkbox"/> Company Limited <input type="checkbox"/> Public Company <input type="checkbox"/> Publicly Listed Company <input type="checkbox"/> Other.....		
		Type of Business ²	<input type="text"/>		
Name of the Juristic Entity ⁵	<input type="text"/>	Position ⁴	<input type="text"/>	Position Taking Date ⁶	<input type="text"/>
Address/Telephone	<input type="text"/>	Legal Entity	<input type="checkbox"/> Limited Partnership <input type="checkbox"/> Company Limited <input type="checkbox"/> Public Company <input type="checkbox"/> Publicly Listed Company <input type="checkbox"/> Other.....		
		Type of Business ²	<input type="text"/>		
Name of the Juristic Entity ⁵	<input type="text"/>	Position ⁴	<input type="text"/>	Position Taking Date ⁶	<input type="text"/>
Address/Telephone	<input type="text"/>	Legal Entity	<input type="checkbox"/> Limited Partnership <input type="checkbox"/> Company Limited <input type="checkbox"/> Public Company <input type="checkbox"/> Publicly Listed Company <input type="checkbox"/> Other.....		
		Type of Business ²	<input type="text"/>		

Note: ¹ Means juristic entities having or anticipated to have any connected transaction with the Company or its subsidiaries. (If no, please state "None")

² Means types of business such as agriculture, food industry, consumer goods, financial business, industrial goods, real estate and construction, service business, technology, etc.

³ Names legal entity of business such as limited partnership, company limited, public company, publicly listed company etc.

⁴ Means directors, General Manager, or executives who are among the four highest levels of the Company's management after the General Manager, as well as all the management in the top fourth level and the equivalent positions thereof, and executives in the Accounting & Finance Department from the level of the Department Chief upward, or the equivalent positions thereof.

⁵ Means juristic entities having or anticipated to have any connected transaction with the Company or its subsidiaries (If no, please state "None").

⁶ Means if the date of position taking cannot be stated, approximate number of years or the year of taking up position can be applied.

⁷ Means the amount taken from the shareholding ratio worksheet (on the next page). Applied only for the case of over 10% in shareholding since such ratio is deemed as being a major shareholder of such juristic entities.



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REPORT OF INTERESTS OF DIRECTORS, EXECUTIVES AND RELATED PERSONS
UNIVENTURES PUBLIC COMPANY LIMITED

Part 4: Information on Shareholding in Other Juristic Entities of the Filer (Including Shareholding of Persons Related to the Filer)

(Only Juristic Entities Having or Anticipated to Have Any Connected Transaction with UV or Its Subsidiaries)

Table with 7 rows and 5 columns: Name of the Juristic Entity, Address/Telephone, Type of Business, % of Shareholding, and Year. Each row contains input fields for these details.

Note: 1 Means juristic entities having or anticipated to have any connected transaction with the Company or its subsidiaries. (If no, please state "None")

2 Means types of business such as agriculture, food industry, consumer goods, financial business, industrial goods, real estate and construction, service business, technology, etc.

3 Names legal entity of business such as limited partnership, company limited, public company, publicly listed company etc.

4 Means directors, General Manager, or executives who are among the four highest levels of the Company's management after the General Manager, as well as all the management in the top fourth level and the equivalent positions thereof, and executives in the Accounting & Finance Department from the level of the Department Chief upward, or the equivalent positions thereof.

5 Means juristic entities having or anticipated to have any connected transaction with the Company or its subsidiaries (If no, please state "None").

6 Means if the date of position taking cannot be stated, approximate number of years or the year of taking up position can be applied.

7 Means the amount taken from the shareholding ratio worksheet (on the next page). Applied only for the case of over 10% in shareholding since such ratio is deemed as being a major shareholder of such juristic entities.



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REPORT OF INTERESTS OF DIRECTORS, EXECUTIVES AND RELATED PERSONS
UNIVENTURES PUBLIC COMPANY LIMITED

▶ Part 5: Signature

Certified by the Filer

Acknowledge By

SignatureFiler

(.....)

Date/...../.....

Signature Company Secretary

(.....)

Date/...../.....



REPORT OF INTERESTS OF DIRECTORS, EXECUTIVES AND RELATED PERSONS
UNIVENTURES PUBLIC COMPANY LIMITED

Worksheet for Calculation of Shares Held in Each of the Other Juristic Entities (Attachment for Part 4)

Name of the Juristic Entity

Shareholders	% of Shareholding
(1) Filer	
(2) Spouse	
(3) Minor Children/Minor Adopted Children	
(4) General partnership that the filer and his/her spouse, or their minor children are the partners thereof	
(5) Limited partnership that the filer and his/her spouse, or their minor children are the partners with unlimited or limited liability thereof, with the total combined shareholding over 30%	
(6) Company limited or public company that the filer and his/her spouse, or their minor children, or the partnership under (4) or (5) hold the total combined shares over 30%	
(7) Publicly listed company that the filer and his/her spouse, or their minor children, or the partnership under (4) or (5) hold the total combined shares over 30%	
(8) Juristic entity that the filer maintains management authority as the juristic representative	
Total shareholding in each juristic entity of the filer and his/her related persons (%)	



Report on Changes of Securities and Derivatives Holding in The Univentures Public Company Limited

Director Executive Auditor Other (please specify)

Reported by: Position

Identification Card Number Telephone Number.....

Reporting date:

Name of securities / derivatives holder ¹	Types of securities and derivatives	Transaction date	No. of securities and derivatives held before transaction date	Transaction ²		No. of securities and derivatives held after transaction date	Method of transaction ³	Transaction executed by Specify broker's name. Specify margin account if applicable	Purchaser/ Transferee (Specify name and relationship) ⁵
				Amount	Average price				
Reporter	common share								
	preferred share								
	warrant								
	transferable subscription right								
	convertible debenture								
	derivatives warrant								
	NVDR								
	stock futures								
	structured debenture								

Name of securities / derivatives holder ¹	Types of securities and derivatives	Transaction date	No. of securities and derivatives held before transaction date	Transaction ²		No. of securities and derivatives held after transaction date	Method of transaction ³	Transaction executed by Specify broker's name. Specify margin account if applicable	Purchaser/ Transferee (Specify name and relationship) ⁵
				Amount	Average price				
Name of Spouse / cohabiting couple	common share								
	preferred share								
	warrant								
	transferable subscription right								
	convertible debenture								
	derivatives warrant								
	NVDR								
	stock futures								
	structured debenture								

Name of securities / derivatives holder ¹	Types of securities and derivatives	Transaction date	No. of securities and derivatives held before transaction date	Transaction ²		No. of securities and derivatives held after transaction date	Method of transaction ³	Transaction executed by Specify broker's name. Specify margin account if applicable	Purchaser/ Transferee (Specify name and relationship) ⁵
				Amount	Average price				
Name of Minor child	common share								
1.....	preferred share								
2.....	warrant								
3.....	transferable subscription right								
	convertible debenture								
	derivatives warrant								
	NVDR								
	stock futures								
	structured debenture								

Name of securities / derivatives holder ¹	Types of securities and derivatives	Transaction date	No. of securities and derivatives held before transaction date	Transaction ²		No. of securities and derivatives held after transaction date	Method of transaction ³	Transaction executed by Specify broker's name. Specify margin account if applicable	Purchaser/ Transferee (Specify name and relationship) ⁵
				Amount	Average price				
Name of legal entity in which the reporter, spouse or cohabiting couple and minor children collectively hold shares at an amount exceeding 30% of the total voting rights as the largest shareholder (s) in such legal entity 1..... 2..... 3.....	common share								
	preferred share								
	warrant								
	transferable subscription right								
	convertible debenture								
	derivatives warrant								
	NVDR								
	stock futures								
structured debenture									

The person appointed as contact person

1. Mr. Pornchai Katejinakul, Company Secretary

Telephone 02-643-7195 E-mail: pornchai.k@univentures.co.th

2. (if any).....

I hereby certify that the above report is complete and true in all respects.

Signature of reporter

()

Position

Company

Date

The following instructions for filling out Form 59

The following instructions for filling out Form 59 are provided for general understanding. Reporters on changes of securities and derivatives holding are advised to consult the Notification of the Office of the Securities and Exchange Commission No. Sor Jor. 38/2561 Re: Preparation of Report on Changes to the Securities and Derivatives Holding of Director, Executive, Auditor, Plan Preparer and Plan Administrator dated 16 July 2018 ("Notification No. Sor Jor. 38/2561") carefully to ensure complete and accurate reporting on such changes.

1. The reporting on changes to the securities and derivatives holding (Form 59) of director, executive, auditor, plan preparer, plan administrator, spouse, cohabiting couple, minor child of the aforesaid persons, legal entity in which the reporter, spouse or cohabiting couple and minor children collectively hold shares at an amount exceeding 30 percent of the total voting rights as the largest shareholder(s) in such legal entity shall include the securities and derivatives holding and changes thereof by nominees of the aforesaid persons. (Specify nominees' report separately from the direct holding of the aforesaid persons).
2. In case of a same-day acquisition and disposition of securities and derivatives, the total amounts and the weighted average prices thereof shall be reported separately with such information on the disposition's side put in bracket;
3. In case of an acquisition of securities and derivatives, specify the method of such acquisition, for example, purchase on the Stock Exchange, over-the-counter purchase, acceptance of securities transfer, and receipt of returned securities from the borrower, etc.

In case of a disposition of securities and derivatives, specify the method of such disposition, for example, selling on the Stock Exchange, selling off the Stock Exchange, transferring securities, lending securities, etc.;

4. Clearly specify if a purchase, sale, transfer or acceptance of transfer is made in a margin account;
5. In the case of:
 - (1) selling off the Stock Exchange at a lower price than the lowest selling price of such securities on the Stock Exchange on that day;
 - (2) selling through a big lot; or
 - (3) transferring the securities and derivatives to others without consideration;

the reporter shall specify the name of the purchaser or the transferee and the relationship with the director, executive, auditor, spouse or cohabiting couple and minor child of such persons such as:

- family members, such as father, mother, brother or sister of full blood, brother or sister of half-blood, grandfather, grandmother, uncle, aunt, etc.;
- relationship where one has control over or is able to exert influence on the other, such as director, executive, auditor or spouse of such persons is the employer of the purchaser transferor of the securities;
- business relationship, such as strategic partner, trade partner, etc.;
- other forms of relationship.



Form 4
 For UV Executives, UV group Executives and employees to file their information

Report on Receive of Gifts, Assets, and Benefits

For Executives and Employees to abide by as the principles of business conduct adopted according to professional integrity and ethics, they are required to report the acceptance of any cash, gift, present, assets, and benefits that exceed the value of Baht 3,000 according to the following Company's policy.

I, whose name is(family name), hold the position of, would like to report the acceptance of following cash, gift, present, assets, and benefits.

Date	Received Item	Amount	Approximate Value	From Individual/Company
Total				

I have already reported my receipt of cash, gift, present, assets, and benefits as set forth above in adherence to honesty, transparency, clarity, and accountability in the manner as prescribed by the Company.

I am hereby submitting this information for your perusal.

Signature.....	Signature.....	Signature.....
Filer	Supervisor / Managing Director	Internal Audit Department / Compliance Department
Date.....	Date.....	Date.....

Opinion of the President

- Allow the employee to accept
- Keep as a present for New Year Prize Draw Party
- Other

Signature

Date



Complaint Form

Date

Time

Filer Name..... Telephone Number

House No. Moo/Village..... Lane/Soi.....

Road..... Tambol/Kwaeng.....

Amphur/Khet..... Province..... Postal Code.....

Relationship of Filer Shareholder Employee Other

Would like to file a complaint about

Summary of the complaint
.....
.....
.....
.....

I would like the following actions be taken
.....
.....
.....
.....
.....

I hereby certify that the information set forth above is true in all respects.

(.....)

Complaint Filer

(.....)

Acceptor of Complaint Filing

Note: You can file this complaint by choosing not to disclose your identity. However, the Company reserves the right to review and verify relevant evidence as appears. It is in the Company's discretion to review the matter of complaint and consider whether such complaint is reasonable and valid. If so, the Company shall then process the complaint according to its prescribed complaint handling procedures. If you wish the Company to quickly respond to your complaint, kindly certify all pertinent documents and evidences regarding such complaint and revert them back to the Head Internal Audit Department, Univentures Public Company Limited, 22nd Park Ventures Ecoplex, 57 Wireless Road, Lumpini, Patumwan, Bangkok 10330; Telephone Number 02-643-7100 Extension 7195-7